



Comhairle Contae **Lú**  
**Louth** County Council

## Variation No. 1 of the Louth County Development Plan 2021-2027

Adopted 18<sup>th</sup> July 2022



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## 1.0 Introduction

In accordance with section 13(2) of the Planning and Development Act 2000 (as amended), Louth County Council is proposing a variation of the Louth County Development Plan 2021-2027.

### 1.1 Reasons for this Variation

1. To update the County Development Plan to take account of the methodology and housing projections as set out in the Section 28 Guidelines 'Housing Supply Target Methodology for Development Planning' and the 'Projected Housing Demand by Local Authority Area 2020-2031 – ESRI NPF Scenario Housing Supply Target' provided by the Department of Housing, Local Government and Heritage in December 2020. This will ensure that the housing provision in the Development Plan is consistent with, and aligned with, national and regional policy.
2. To update the County Development Plan to ensure it is consistent with Part V of the Planning and Development Act as amended by the Affordable Housing Act 2021.

### 1.2 Making a Submission

Written observations or submissions regarding the proposed variation can be made between **Wednesday 18<sup>th</sup> May, 2022 and 4pm on Friday 17<sup>th</sup> June, 2022** in either of the following forms:

- Email: [variation@louthcoco.ie](mailto:variation@louthcoco.ie)  
or
- In writing to: Thomas McEvoy, Acting Director of Services, Louth County Council, Town Hall, Crowe Street, Dundalk, Co. Louth A91 W20C

Submissions/observations shall be made by **one medium only** and should include:

- Full name and address of the person making the submission/observation (on a separate page to the submission).
- Where applicable details of the organisation/community/company you represent.

**Please note that submissions/observations that do not relate to the proposed variation will not be considered.**

### 1.3 Next Stage of the Process

When the public display period for the proposed variation comes to an end a Chief Executive's Report on submissions/observations received will be prepared. This will include a summary of the issues raised and the response and recommendation of the Chief Executive. This Report will be considered by the elected members of Louth County Council.

Following the consideration of the proposed variation and the Chief Executive’s Report the elected members may, by resolution, make the variation as proposed, with or without modifications or they may refuse to make it.

Where the elected members propose to make a modification to the proposed variation and this would, if made, be a material alteration to the proposed variation, the Planning Authority shall publish notice of the proposed material alteration and invite submissions from the public.

#### 1.4 Adoption of the Variation

The elected members agreed, by resolution, to make this Variation (Variation No.1) at a Council Meeting on the 18<sup>th</sup> July 2022.

#### 1.5 Identifying the Proposed Changes

Changes to the text are indicated as follows:

New text is in **red** and deleted text will be in ~~blue with a strikethrough~~.

### 2.0 Proposed Variation

The proposed variation will involve amendments to the following sections/tables of the Louth County Development Plan 2021-2027:

| Chapter   | Section/Table | Proposed Change   |
|---|---------------|---|
| Chapter 2 – Core Strategy and Settlement Strategy | Section 2.6.3 | Projecting Housing Demand to 2027   |
|   | Section 2.6.4 | Occupancy Rate  |
|   | Section 2.6.5 | Projected housing requirement   |
|   | Table 2.17    | Core Strategy Table   |
|   | Table 2.18    | Overview of Key Statistics for Drogheda   |
|   | Table 2.19    | Overview of Key Statistics for Dundalk  |
|   | Table 2.20    | Overview of Key Statistics for Ardee  |
|   |               | The text and tables in Sections 2.6.3, 2.6.4, and 2.6.5 will be deleted and replaced with a new Section 2.6.3 which will include 1 no. table. |
|   |               | This table will be updated and will now be Table 2.15.  |
|   |               | The projected housing stock in 2027 and the projected housing stock increase 2021-2027 will be updated. This table will now be Table 2.16.    |
|   |               | The projected housing stock in 2027 and the projected housing stock increase 2021-2027 will be updated. This table will now be Table 2.17.    |
|   |               | The projected housing stock in 2027 and the projected housing stock increase 2021-2027 will be updated. This table will now be Table 2.18.    |

| Chapter                          | Section/Table         | Section/Table   | Proposed Change   |
|----------------------------------|-----------------------|---|---|
|                                  | Table 2.21            | Overview of Key Statistics for Dunleer  | The projected housing stock in 2027 and the projected housing stock increase 2021-2027 will be updated. This table will now be Table 2.19.  |
|                                  | Table 2.22            | Overview of Key Statistics for Self-Sustaining Towns  | The projected housing stock increase 2021-2027 will be updated. This table will now be Table 2.20.  |
| Chapter 3 – Housing Strategy     | Section 3.4           | Housing Strategy  | Update the projection of households that will not qualify for a mortgage/be able to afford private rental during the plan period, based on the revised housing allocations.                           |
|                                  | Policy Objective HOU3 | Housing Strategy  | Amend the text in this policy objective to reflect the amendments to Part V of the Planning and Development Act under the Affordable Housing Act 2021.  |
| Volume 2 – Settlement Statements | Vol 2                 | Settlement Overview Table in the Settlement Statement for each of the 5 Self-Sustaining Towns | Update the Housing Allocation in each of these tables to reflect that set out in the revised Core Strategy Table.   |
| Volume 3 – Housing Strategy      | App 3                 | Update the Housing Strategy   | Update the Housing Strategy to take account of the revised housing projections for the County and the amendments to Part V of the Planning and Development Act under the Affordable Housing Act 2021. |
| General                          |                       | Section numbers and Table numbers   | All section numbers and Table numbers will be reviewed and updated to take account of any sections or tables deleted as a result of the proposed Variation.   |

## 3.0 Chapter 2 (Amendments)

### (Proposed Amendments to Text)

#### 2.6.3 Projecting Housing Demand to 2027

In the absence of national guidance, in the form of the awaited Development Plan Guidelines (currently being prepared by the Department of Housing, Local Government and Heritage), the delivery of an evidence based strategy regarding household projections, occupancy rates and land requirements are somewhat challenging, but nonetheless necessary.

Consequently, the projections and calculations as indicated in the Core Strategy Table (Table 2.17) have been based on an analysis of available data without the benefit of the updated Development Plan Guidelines.

#### 2.6.4 Occupancy Rate

In line with the NPF Implementation Roadmap, Louth's population is projected to grow by 21,082 persons between 2016 and 2027 (16% increase). At a settlement level the occupancy rate in the County varies from 2.62 in Dundalk to 2.92 in the rural area. It is important in ensuring an accurate projection of future housing requirements that the projected occupancy rate is reflective of the rate of occupancy in the particular settlement. Taking this into account a specific occupancy rate has been assigned to each settlement. Details of the average occupancy rate in 2016 are detailed in Table 2.13.

#### 2.6.5 Projected Housing Requirement

The 2016 Census recorded a total housing stock of 51,399 units in Louth.<sup>1</sup> The Housing Strategy as set out in Appendix 3 of Volume 3 estimates that the number of households in the County will increase to 57,679 by 2027. This is based on a graduated decline in the household size to 2.6 in 2027. It is important to note that the figure of 57,679 refers to households only and does not take account of additional factors that affect the housing market such as the demand for second homes or holiday homes. In addition, this figure does not take account of vacancy rates that will exist at any point in time. Housing supply is inelastic and therefore, in order to ensure there is a sufficient supply of housing available to meet the demands of a functional market it is prudent that this Core Strategy takes account of these additional factors. In this regard a vacancy rate of 7% has been factored into the calculation of the projected housing requirement for the County<sup>2</sup>. This will provide a more accurate reflection of the 'total housing stock' required, to meet the needs of the projected population over the lifetime of this development plan. Inclusive of the vacancy rate of 7% the projected housing stock in the County in 2027 will be 61,717 units, which equates to an additional 10,318 units between 2016-2027.

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<sup>1</sup>The Census indicates that the total housing stock consists of permanent private households, holiday homes, vacant houses or apartments, and dwellings where the occupants were temporarily absent of Census night.

<sup>2</sup>The rate of vacancy has taken account of recent levels of vacancy in the County and 'The National Vacant Housing Reuse Strategy 2018-2021' which indicates a normal vacancy rate of 2.5%-6% in a normal functioning market.

Factoring in the completed units during the period 2016-2020 (c.2,040 units, based on an analysis of the CSO 'New Dwelling Completions' data and a review of recent residential development in settlements) this results in a projected housing requirement of 8,278 units during the 6-year period between 2021 and 2027, which equates to an annual average output of 1,380 units/annum.

This figure is realistic and achievable having regard to the designation of the two RGC's of Drogheda and Dundalk, and the anticipated housing requirements as provided for in the NPF and Rebuilding Ireland. Details relating to projected household occupancy rates and projected housing requirement for 2021-2027 are outlined in Tables 2.14 and 2.15.

### (Proposed Deletion of Tables)

**TABLE 2.13: AVERAGE OCCUPANCY RATE 2016**

| Population 2016 | Total Housing Stock 2016 | Vacant Units 2016  | Vacancy Rate 2016 | Average Occupancy Rate 2016 |
|-----------------|--------------------------|--------------------|-------------------|-----------------------------|
| 128,884         | 51,399                   | 3,952 <sup>3</sup> | 7.7%              | 2.76 <sup>4</sup>           |

<sup>3</sup> This does not include 761 vacant holiday homes. When this is factored in the Vacancy Rate in the County in 2016 was 9.2%

<sup>4</sup> This was calculated by dividing the population by occupied units i.e. vacant units – vacant holiday homes were not included.

**TABLE 2.14: PROJECTED HOUSEHOLD OCCUPANCY RATES**

| Projected Population 2027 | Projected Average Household Occupancy Rate | Projected Occupied Households 2027 | Projected Vacancy Rate 2027 | Projected Housing Stock 2027 | Projected Additional Housing Required 2016-2027 |
|---------------------------|--|------------------------------------|-----------------------------|------------------------------|---|
| 149,966                   | 2.6  | 57,679                             | 7%                          | 61,717                       | 10,318  |

**TABLE 2.15: PROJECTED HOUSEHOLD REQUIREMENT 2016-2027**

| Projected Housing Requirement 2016-2027 | Approximate number of units completed 2016-2020 | Projected Housing requirement 2021-2027 |
|---|---|---|
| 10,318                                  | 2,040   | 8,278                                   |

<sup>1</sup> The Census indicates that the total housing stock consists of permanent private households, holiday homes, vacant houses or apartments, and dwellings where the occupants were temporarily absent of Census night.

<sup>2</sup> The rate of vacancy has taken account of recent levels of vacancy in the County and 'The National Vacant Housing Reuse

Strategy 2018-2021' which indicates a normal vacancy rate of 2.5%-6% in a normal functioning market.

<sup>3</sup> This does not include 761 vacant holiday homes. When this is factored in the Vacancy Rate in the County in 2016 was 9.2%

<sup>4</sup> This was calculated by dividing the population by occupied units i.e. vacant units – vacant holiday homes were not included.

## (Proposed Insertion of New Text)

### 2.6.3 Projecting Housing Demand to 2027

In December 2020 the Department (DHLGH) published Section 28 Guidelines to assist Local Authorities in projecting housing demand as part of the preparation of a Development Plan.

These Guidelines ‘Housing Supply Target Methodology for Development Planning’ include a projected housing demand for each Local Authority between 2017-2031.

This projection is derived from research carried out by the ESRI<sup>5</sup>, which involved a range of variables being inputted into an econometric and demographic projection model.

As part of the ESRI research four development scenarios were considered as follows:

- **Baseline** – projecting a ‘business as usual’ scenario which is based on current trends and medium-term projections for the Irish economy;
- **NPF 50:50 City** – consistent with the NPF strategy;
- **High Migration** – incorporating assumptions around high international migration flows into Ireland based on higher economic growth than the baseline;
- **Low Migration** – incorporating assumptions around lower international migration flows into Ireland based on lower economic growth than the baseline.

Under each of these scenarios, housing demand levels for each year from 2017-2031 was provided and are available for use by planning authorities in the preparation of a Housing Strategy/Housing Need Demand Assessment (HNDA).

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<sup>5</sup> ESRI Research Series No.111 ‘Regional Demographics and Structural Housing Demand at a County Level, December 2020.

The Guidelines recommend that the NPF 50:50 City Scenario is followed in order to plan for the provision of housing that will meet the projected demand in accordance with the NPF Strategy. Table 2.13 below provides details of the housing demand in Louth up to the end of Q3 2027 based on the ESRI NPF demand scenario.

The projected housing demand during the plan period (Q3 2021-Q3 2027) is 6,691 residential units. When accounting for the completion of 167 units in the County in Q4 of 2021 as detailed in the CSO Housing Completions data the demand for the remainder of the plan period i.e. Q1 2022-Q3 2027 is 6,524 units.<sup>6</sup>

This projection is considered to be consistent with national and regional policy and has taken into account the projected population increase in the County between 2016-2027, which is based on the high growth scenario in the NPF Implementation Roadmap, inclusive of the 25% headroom, in addition to the designation of Drogheda and Dundalk as Regional Growth Centres in the NPF and RSES, which acknowledges the potential of these settlements to act as a counter balance to Dublin and become drivers of regional growth and development along the Dublin-Belfast Economic Corridor.

The distribution of the housing allocation is aligned with the population projection for each settlement and has also taken account of the position of the settlement in the settlement hierarchy for the County. Full details are set out in the Core Strategy Table (Table 2.15).

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<sup>6</sup> The County Development Plan came into effect on the 11<sup>th</sup> November 2021. When preparing Variation 1 of the CDP consideration was given to the number of household completions in Louth in Q4 of 2021, which was 167 units. This figure was subtracted from 6,691 to give a housing target of 6,524 units for the remainder of the plan period i.e. Q12022-Q32027.

**Table 2.13: Housing Demand in Louth 2017 - Q3 2027**

|   | Louth  | Total Households         | Number of Relevant Years | Annual Average Households |
|---|--|--------------------------|--------------------------|---------------------------|
| A | ESRI NPF scenario projected new household demand 2017 to end Q3 2027   | 9,214                    | 10.75                    | 857                       |
| B | Actual new housing supply 2017 to end Q3 2021  | 2,756                    | 4.75                     | 580                       |
| C | Homeless households (latest data), and unmet demand as at most recent Census                                   | 233                      | -                        | -                         |
| D | <b>Plan Housing Demand</b> = Total (A-B+C),<br>(Projected ESRI NPF demand - new completions)<br>= Unmet demand | <b>6,691<sup>6</sup></b> | <b>6</b>                 | <b>1,115</b>              |



### 3.1 Chapter 2 - Core Strategy Table (Proposed Amendments to Table)

TABLE 2.17-2.15: CORE STRATEGY TABLE

| Column A                     | Column B                    | Column C        | Column D                              | Column E                  | Column F                           | Column G                                 | Column H                          | Column I                     | Column J  | Column K   | Column L                                       | Column M   |
|------------------------------|-----------------------------|-----------------|---------------------------------------|---------------------------|------------------------------------|--|-----------------------------------|------------------------------|---|--|--|--|
| Settlement Category          | Settlement                  | Population 2016 | Projected Population Increase to 2027 | Projected Population 2027 | Total Projected Housing Stock 2027 | Total Additional Housing Units 2016-2027 | Approx. Units Completed 2016-2020 | Housing Allocation 2021-2027 | Lands with potential to deliver Infill or Brownfield Development (ha) | Potential units to be delivered on Infill/Brownfield Lands | Total Lands Zoned New Residential Phase 1 (ha) | Total lands zoned New Residential (Phase 1 and Phase 2) (ha) |
| County                       | Louth                       | 128,884         | 21,082                                | 149,966                   | 61,717                             | 10,318                                   | 2,040                             | 8,278<br>6,524               | 110.4   | 4,302  | 506.1  | 597.1  |
| Regional Growth Centre       | Drogheda                    | 34,199          | 6,914                                 | 41,113                    | 17,184                             | 3,443                                    | 400                               | 3,043<br>2,447               | 34.8  | 1,725  | 270  | 270  |
|                              | Dundalk                     | 39,004          | 7,660                                 | 46,664                    | 19,892                             | 3,541                                    | 935                               | 2,606<br>2,447               | 30  | 1,743  | 150.3  | 225.7  |
| Self-Sustaining Growth Towns | Ardee                       | 4,928           | 1,655                                 | 6,583                     | 2,751                              | 749                                      | 165                               | 584<br>440                   | 8.5   | 298  | 35.9   | 51.5   |
|                              | Dunleer                     | 1,822           | 935                                   | 2,757                     | 1,144                              | 425                                      | 80                                | 345<br>146                   | 3.1   | 109  | 8.4  | 8.4  |
| Self-Sustaining Towns        | Carlingford                 | 1,445           | 200                                   | 1,645                     | 881                                | 41                                       | 0                                 | 41<br>50                     | 2.6   | 31   | 2.0  | 2.0  |
|                              | Castlebellingham / Kilsaran | 1,126           | 110                                   | 1,236                     | 597                                | 87                                       | 8                                 | 79<br>65                     | 1.1   | 27   | 10.9   | 10.9   |
|                              | Clogherhead                 | 2,145           | 300                                   | 2,445                     | 1,034                              | 139                                      | 0                                 | 139<br>75                    | 1.6   | 39   | 3.2  | 3.2  |
|                              | Termonfeekin                | 1,579           | 250                                   | 1,829                     | 663                                | 81                                       | 40                                | 41<br>70                     | 3.4   | 40   | 4.5  | 4.5  |
|                              | Tullyallen                  | 1,547           | 220                                   | 1,767                     | 630                                | 130                                      | 15                                | 115<br>65                    | 1.2   | 29   | 0  | 0  |
| Small Towns & Villages       | Level 4 Settlements         | 5,103           | 785                                   | 5,888                     | 2,405                              | 436                                      | 22                                | 414<br>230                   | 24.1  | 260  | 20.8   | 20.8   |
| Rural Nodes                  | Level 5 Settlements         | 35,986          | 300                                   | 38,039                    | 14,536                             | 1,246                                    | 375                               | 871                          | N/A   | N/A  | N/A  | N/A  |
| Rural Area                   | Rural Area                  |                 | 1,753                                 |                           |                                    |  |                                   | 489                          |   |  |  |  |

(Proposed Amendments to Tables)

Table 2.1816: Overview of Key Statistics for Drogheda

| DROGHEDA                                   |                                  |
|--|----------------------------------|
| <del>Projected Housing Stock 2027</del>    | <b>16,311</b>                    |
| Projected Housing Stock Increase 2021-2027 | <del>2,606</del><br><b>2,447</b> |

Table 2.1917: Overview of Key Statistics for Dundalk

| DUNDALK                                    |                                  |
|--|----------------------------------|
| <del>Projected Housing Stock 2027</del>    | <b>18,912</b>                    |
| Projected Housing Stock Increase 2021-2027 | <del>2,561</del><br><b>2,447</b> |

Table 2.2018: Overview of Key Statistics for Ardee

| ARDEE                                      |                              |
|--|------------------------------|
| <del>Projected Housing Stock 2027</del>    | <b>2,751</b>                 |
| Projected Housing Stock Increase 2021-2027 | <del>584</del><br><b>440</b> |

Table 2.2119: Overview of Key Statistics for Dunleer

| ARDEE                                      |                              |
|--|------------------------------|
| <del>Projected Housing Stock 2027</del>    | <b>1,144</b>                 |
| Projected Housing Stock Increase 2021-2027 | <del>345</del><br><b>146</b> |

Table 2.2220: Overview of Key Statistics for Self-Sustaining Towns

| Settlement                 | Population 2016 | Projected Population 2021-2027 | Housing Stock 2016 | Housing Allocation 2021-2027 | Resident Workforce 2016 | Total Jobs 2016 | Job:Workforce Ratio 2016 |
|----------------------------|-----------------|--------------------------------|--------------------|------------------------------|-------------------------|-----------------|--------------------------|
| Carlingford                | 1,445           | 1,645                          | 840                | <del>41</del> <b>50</b>      | 459                     | 370             | 0.81                     |
| Castlebellingham /Kilsaran | 1,126           | 1,236                          | 510                | <del>79</del> <b>65</b>      | 451                     | 295             | 0.65                     |
| Clogherhead                | 2,145           | 2,445                          | 895                | <del>139</del> <b>75</b>     | 860                     | 150             | 0.17                     |
| Termonfeckin               | 1,579           | 1,829                          | 582                | <del>41</del> <b>70</b>      | 629                     | 204             | 0.32                     |
| Tullyallen                 | 1,547           | 1,767                          | 500                | <del>115</del> <b>65</b>     | 675                     | 138             | 0.20                     |

## 4.0 Chapter 3 – Amendments

### (Proposed Amendments to Text)

#### 3.4 Housing Strategy

In accordance with the requirements of Section 94 of the *Planning and Development Act 2000 (as amended)*, a Housing Strategy has been prepared for this Plan. The purpose of a Housing Strategy is to ensure that provision is made for the housing requirements of the existing and future population of the County.

National Policy Objective 37 of the National Planning Framework (NPF), requires each Local Authority to develop a Housing Need Demand Assessment (HNDA), which must underpin and support the preparation of housing strategies and all related housing policy outputs.

A detailed analysis of socio-economic data was used to create a robust, evidence based baseline that informed the policy framework for household growth during the plan period.

It is anticipated that the HNDA carried out as part of the Housing Strategy in this Plan will enhance how acute and unmet demand for housing is identified before it arises.

It provides a robust assessment of regional and localised influences, such as population and migration in quantifying needs and demands. The analysis of the socio-economic data provided the baseline for projecting future household tenure and size during the lifetime of the Plan.

Further details are set out in Section 4.0 of the Housing Strategy 'Housing Needs' (Volume 3, Appendix 3).

The Housing Strategy has determined that ~~2,260~~ 1,949 households will not qualify for a mortgage during the plan period.

It has also been determined that these ~~2,260~~ 1,949 households will not meet the affordability criteria for private rental. These households are considered to require social and affordable housing. This equates to ~~29.4%~~ 29.1% of the additional anticipated households during the plan period.

Full details of the Housing Strategy are set out in Volume 3, Appendix 3.

**The proposed amendments to policy objective HOU 3 are as follows:**

| Policy Objective |  |
|------------------|--|
| <b>HOU 3</b>     | To apply a <del>10%</del> social and affordable housing requirement in accordance with the requirements of Part V of the Planning and Development Act 2000 (as amended). <del>to land zoned for residential use, regeneration, or for a mixture of residential and other uses.</del> |

## 5.0 Volume 2 – Self-Sustaining Towns

### (Proposed Amendments to Tables)

#### 5.1 Carlingford

Table 1.1: Settlement Overview

| Settlement Overview          |                              |
|------------------------------|------------------------------|
| Housing Allocation 2021-2027 | <del>41 units</del> 50 units |

#### 5.2 Castlebellingham/Kilsaran

Table 2.1: Settlement Overview

| Settlement Overview          |  |
|------------------------------|--|
| Housing Allocation 2021-2027 | <del>59 units</del> 65 units (8 units completed) |

#### 5.3 Clogherhead

Table 3.1: Settlement Overview

| Settlement Overview          |  |
|------------------------------|--|
| Housing Allocation 2021-2027 | <del>12 units</del> 75 units (0 completed) |

#### 5.4 Termonfeckin

Table 4.1: Settlement Overview

| Settlement Overview          |  |
|------------------------------|--|
| Housing Allocation 2021-2027 | <del>96 units</del> 70 units (0 completed) |

#### 5.5 Tullyallen

Table 5.1: Settlement Overview

| Settlement Overview          |  |
|------------------------------|--|
| Housing Allocation 2021-2027 | <del>21 units</del> 65 units (0 completed) |

## **6.0 Volume 3 – Appendix 3 – Amendments to Housing Strategy**

The proposed amendments to the Housing Strategy are included in a separate document entitled ‘Proposed Variation No.1 of the Louth County Development Plan 2021-2027 – Amendments to the Housing Strategy.’

The changes to text and tables follow the same format as set out in Section 1.4 of this document.