

Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

3ú Urlár ó Thuaidh | Ionad Cathartha | An tSráid Mhór | Baile Munna | Baile Átha Cliath 9
3rd Floor North | Ballymun Civic Centre | Main Street | Ballymun | Dublin 9



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

The Eastern and Midland Regional Assembly notes the publication of the proposed Variation No. 1 of the Louth County Development Plan 2021-2027 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 10th June 2022.

Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region which was made on 28th June 2019. In line with the provisions of the Planning and Development Act 2000, as amended (the Act), the Planning Authority shall ensure, when making and varying the County Development Plan, that it is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy.

Legislative Context

As required by Section 27C of the Act, The Eastern and Midland Regional Assembly has prepared this submission, and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the aforementioned Act, submissions or observations shall contain a report which shall state whether, in the opinion of the Assembly, the draft variation of the development plan, and, in particular, its core strategy, are consistent with the Regional Spatial and Economic Strategy.

Where the opinion of the regional assembly stated in the submission is that the proposed variation of the development plan and its core strategy are not consistent with the regional spatial and economic strategy, the submission shall include recommendations as to what amendments, in the opinion of the regional assembly, are required in order to ensure that the proposed variation to the development plan and its core strategy are so consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters as required under Section 27C of the Act.

Proposed Variation

The reasons for Proposed Variation No. 1 of the Louth County Development Plan (CDP) 2021- 2027 are stated to be;

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.

The proposed variation amends a number of sections of the Louth County Development Plan 2021-2027 including, Chapter 2- Core Strategy and Settlement Strategy, Chapter 3- Housing Strategy, Volume 2- Settlement Statements and Volume 3- Housing Strategy.

Submission

The Assembly would like to acknowledge the work undertaken by the Local Authority to align with the most up to date Section 28 Guidelines issued. Accordingly, the Assembly welcomes the overall approach and effort of Louth County Council to coordinate and incorporate policies and objectives, so that they are consistent with national and regional policy.

1.0 Projecting Housing Demand

The proposed variation revises the projected housing demand in line with the ‘Housing Supply Target Methodology for Development Planning’ issued in December 2020 under Section 28 of the Planning and Development Act 2000, as amended. The Assembly notes that the projected housing demand during the plan period of the Louth CDP (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.

It is noted that this projection 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 proposed variation indicates that 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. It is considered that this is in keeping with the RSES and in particular RPO 3.1 which requires Local Authorities to commit to the delivery of the growth strategy as outlined in the RSES.

2.0 Core Strategy

The Assembly notes that the proposed variation includes an updated Core Strategy Table to indicate the revised housing supply target for the County during the plan period.

In presenting the Core Strategy table as part of the proposed variation, Louth County Council are reminded of their obligations to prepare a Core Strategy in accordance with the provisions of Section 10 of the Act. In particular, the Assembly draws the attention of the Council to the contents of Section 10 (2A) of the Act and asks Louth County Council to ensure consistency in this regard.

The Assembly notes that the revised housing supply target has been allocated across the tiers of the Settlement Hierarchy and presented as part of the Core Strategy Table. It is unclear from the information presented as to how the housing allocations to each settlement level, has been determined. It is recommended that a rationale is provided detailing the basis of housing allocation across the individual settlement tiers, having regard to sections 4.2 and 4.3 of the RSES, including

Regional Policy Objectives (RPOs) 4.1 and 4.2 which relate to the formulation of the Settlement Strategy and alignment with the guiding principles and settlement typologies as per the RSES.

Notwithstanding the indicated housing targets and the quantity of residential zoned land documented as part of the Core Strategy Table, it is unclear how the Local Authority have considered the quantum of residential zoned land as part of the proposed variation. The Assembly notes that whilst the overall housing figures have been adjusted as part of the proposed Core Strategy Table, it is noted that the quantum of lands zoned are unchanged. In light of this, it is recommended that additional clarity is provided relating to the overall quantum of residential zoned land and where appropriate the variation be revised, ensuring that the overall quantum of residentially zoned land is in keeping with the population targets outlined as part of the RSES and the Housing Supply Targets calculated in accordance with the Housing Supply Target Methodology for Development Planning Guidelines, issued in December 2020 under Section 28 of the Planning and Development Act, 2000 (as amended).

In addressing the above, the Draft Development Plan Guidelines published in August 2021, provide guidance in this area, specifically Chapter 4 and Appendix A.

4.0 Housing Strategy

The Assembly notes the proposed variation of Section 3.4 of the Plan that relates to the Housing Strategy. This is in tandem with a number of proposed changes to the Housing Strategy (Appendix 3, Volume 3) of the Louth County Development Plan 2021-2027. As part of this, it is proposed to amend policy HOU 3 of the Plan to ensure consistency with Part V of the Planning and Development Act as amended by the Affordable Housing Act 2021.

It is noted that Part V of the Planning and Development Act has been amended by the Affordable Housing Act 2021 with changes introduced in September 2021 that include transition arrangements until the 31st July 2026. This includes a change from 10% Part V requirement to 20% Part V requirement.

In light of the above, the proposed change to Policy HOU 3 is considered appropriate.

5.0 SEA, AA and SFRA

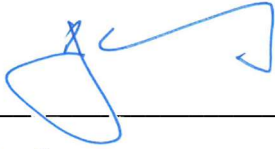
The proposed Variation underwent a Screening for Strategic Environmental Assessment (SEA) and concluded that the proposed Variation would not be likely to result in any significant effects on the environment and SEA is not required. A Screening for Appropriate Assessment (AA) was also carried out and concluded that the proposed variation will not result in adverse effects on a European site, and therefore it is not considered necessary to undertake any further stages of the Appropriate Assessment process.

Conclusion

It is considered that Proposed Variation No. 1 of the Louth County Development Plan 2021-2027 can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the proposed variation, which enhances the alignment of planning policy at county and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and The Assembly welcomes further opportunities to engage with the Local Authority where required.

Regards,

A handwritten signature in blue ink, consisting of a large loop on the left and a horizontal stroke extending to the right with a small upward tick at the end.

Jim Conway
Director
Eastern and Midland Regional Assembly
13th June 2022