



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

Chief Executives Report on Submissions received  
in respect of proposed Variation No. 1 of the Louth  
County Development Plan 2021-2027

24<sup>th</sup> June 2022



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## 1 Section One - Overview

### 1.1 Introduction

This report forms part of the statutory process for varying a Development Plan and is prepared under Section 13(4) of the Planning and Development Act 2000 (as amended).

This Report includes:

1. A list of the persons or bodies who made submissions or observations;
2. A summary of the submissions/observations made under this section including:
  - a. Issues raised by the Office of the Planning Regulator;
  - b. Issues raised by the Eastern and Midland Regional Assembly;
  - c. Issues raised by other bodies or persons.
3. A response from the Chief Executive to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

### 1.2 Reasons for proposed Variation No. 1

The reasons for this Variation are:

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.

This report has been subdivided into two sections as follows:

#### **Section One:**

Provides an overview of the statutory process to date and sets out the legislative background and requirements for the preparation of the Chief Executives Report under the Planning and Development Act 2000 (as amended).



## Section Two:

Contains a full listing of each of the submissions received during the public consultation phase. A summary of the main issues raised in each submission is provided together with the Chief Executive's response and recommendations, taking into account the proper planning and sustainable development of the County, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or Government Minister.

This Report is now formally submitted to the Elected Members for consideration on 24<sup>th</sup> June, 2022.

### 1.3 Public Consultation

A copy of the proposed Variation No. 1 and the accompanying Amendments to the Housing Strategy, Strategic Environmental Assessment Screening and Appropriate Assessment Screening were available for inspection from Wednesday 18th May, 2022 until 4pm on 17th June, 2022. A Strategic Flood Risk Assessment was not required to be undertaken on the variation as the land use zoning objectives of the Louth County Development Plan 2021-2027 are not affected. The documents in respect of this variation were available at the following locations:

#### Louth County Council - Customer Service Desks

- Louth County Council Millennium Centre, Dundalk
- Louth County Council Civic Centre, Town Hall, Dundalk
- Louth County Council Fair Street, Drogheda
- Louth County Council, Mid Louth Civic Service Centre, Ardee

#### Louth County Council – Public Libraries

- Louth Library, Dundalk
- Drogheda Library
- Ardee Library
- Dunleer Library
- Carlingford Library

The proposed Variation (No. 1) of the Louth County Development Plan 2021-2027 was also available for inspection on the Council's website: <https://www.louthcoco.ie/en/publications/development-plans/louth-county-development-plan-2021-2027/>.



## 1.4 Next Steps

It is required that the report of the Chief Executive be prepared and submitted to the Elected Members not later than 8 weeks after giving notice of the intention to make the proposed variation. This report is being circulated to the Elected Members on the 24<sup>th</sup> June 2022.

In accordance with Section 13(5)(a) of the Planning and Development Act 2000 (as amended) the Elected Members shall consider the proposed variation and the report of the Chief Executive. The Elected Members are then required, in accordance with section 13 (5) (b) of the aforementioned Act, to complete their consideration of the proposed variation and the report of the Chief Executive within 6 weeks of receiving the Chief Executive Report.

Following this, the Elected Members must, in accordance with Section 13 (6) (a) of the Planning and Development Act 2000, as amended, resolve to make the variation to the Development Plan, either with or without the proposed alterations or they may refuse to make it. Material alterations require a further public display period of 4 weeks.

In making the variation to the Louth County Development Plan 2021-2027, the Members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates, the statutory obligations of any Local Authority in the area and any relevant policies or objectives for the time being of the of the Government or any Minister of the Government.

If adopted, the variation to the County Development Plan shall have effect from the day that the variation is made.



## 2 Section Two – Submissions

### 2.1 Submissions Received

Twelve (12) submissions were received in relation to the proposed Variation No. 1 of the Louth County Development Plan 2021-2027. The full list of submissions received are detailed in Appendix 1 of this report.

Each submission is summarised below and the Chief Executive’s response and recommendation to each is also provided. Where the details of a submission were replicated in another submission, in the interests of brevity, these have been collectively summarised with the CE Response and Recommendation.

### 2.2 Summary of Submissions and Chief Executive’s Response and Recommendations

Submission Ref. No. LCDP V1 010	Office of the Planning Regulator
<b>Summary of Main Issues Raised:</b>	
<p><b>1. Core Strategy and Settlement Strategy</b></p> <p>The OPR confirms that the HST forecast of 6,524 units is in accordance with the Guidelines methodology.</p> <p><b>2. Housing Supply Target – Drogheda (Recommendation 1)</b></p> <p>The OPR notes that the biggest reduction in housing targets is in Drogheda. The rationale for this is not clear given the national and regional policy framework for the growth of the town.</p> <p>The planning authority is required to provide justification for the significantly reduced housing supply target of 20% for Drogheda over the plan period 2021-2027.</p> <p>The planning authority is also required to demonstrate that the reduced housing supply target will not impact on Drogheda’s ability to reach its RSES population target by 2031.</p> <p><b>3. Settlement Hierarchy and Distribution of Population Growth</b></p> <p>Column D of the Core Strategy Table – projected population increase to 2027 has not been updated as part of the variation. This results in some inconsistencies between the population and housing growth figures for the individual settlements/tiers such that the population projection is inconsistent with the respective housing supply target figure in column F of the Core Strategy Table.</p> <p><b>4. Housing Strategy</b></p> <p>The OPR has no recommendations or observations to make to the amendments to the Housing Strategy or to policy objective HOU 3 relating to Part V of the Act.</p>	



## Chief Executive's Response:

### 1. Core Strategy and Settlement Strategy

The acknowledgement that the projection of 6,524 units is in accordance with the methodology in the HST Guidelines is welcomed.

### 2. Housing Supply Target – Drogheda

The County Development Plan 2021-2027 has prioritised the Regional Growth Centres of Drogheda and Dundalk for population, housing, and employment growth. The Council is strongly committed to supporting Drogheda in reaching a population of 50,000 by 2031 or before. The Council are also satisfied that the housing allocation for Drogheda as set out in the proposed variation will not restrict or impede on the town reaching its population target of 50,000 people by 2031.

In the adopted County Development Plan there was a housing allocation of 8,278 units for the County during the plan period 2021-2027. This figure was calculated by the planning section in the Council in the absence of national guidelines and was based on current and projected occupancy and vacancy rates in the County up to 2027.

Under the methodology for projecting the housing requirement in the HST guidelines this figure has been reduced to 6,524 units, which is a reduction of 1,754 units. Given the reduced figure for the County the distribution of housing between settlements therefore had to be more conservative and take account of what is likely to be delivered during the life of the Plan with greater consideration given to current and projected levels of development activity.

An evidence based approach was taken to the reallocation of housing based on the HST Guidelines. As a starting point the Council took the view that the underlying growth strategy for the Plan would not be altered. In this regard it was not considered necessary to alter the population projection for each settlement. These population projections were taken from the NPF Implementation Roadmap. The HST Guidelines were published in order to ensure a more consistent approach is taken to the projection of housing demand based on the population projections envisaged in the NPF Implementation Roadmap. The distribution of housing between settlements under the proposed variation took account of a range of factors including the population allocation for each settlement, the position of the settlement in the settlement hierarchy, occupancy and vacancy levels, and recent and projected levels of residential development activity.

Drogheda and Dundalk accounted for 68.3% of the total housing allocation for the County in the adopted County Development Plan therefore it is inevitable that it would be these settlements that would experience the largest reduction in the housing allocation as part of the variation.

Whilst it is acknowledged that Drogheda was apportioned a larger reduction in its allocation than Dundalk it is important to view this in the context that Drogheda had a higher housing allocation than Dundalk in the first instance (3,043 units for Drogheda versus 2,606 units for Dundalk).

This revised allocation must also be viewed in the context of the distribution of the proportion of housing distribution to each settlement. In this context 75% of the housing allocation for the County will be directed to Drogheda and Dundalk under the proposed variation.



This is a 6.7% increase on that provided for in the adopted plan.

The Council are satisfied that the revised housing allocations are reflective of the designation of the settlements as a Regional Growth Centre, which will assist in reinforcing the settlement hierarchy in the County. This allocation will allow for an annual average completion rate of 425 residential units per year for the remainder of the lifetime of the Plan (5.75 years). This figure is considered to be realistic and achievable.

The Council will closely monitor development activity across the County and in particular the Regional Growth Centres of Drogheda and Dundalk. If it becomes apparent that these settlements (and in particular Drogheda) are close to reaching their housing allocation as provided for in the Core Strategy the Council will consider re-allocating housing from settlements that are under less pressure for development and/or will seek an additional housing allocation from the Department.

### **3. Settlement Hierarchy and distribution of population growth**

The Council acknowledges that the population projections for each settlement were not altered as part of the proposed variation. The reason for this is that the growth strategy for the development plan remains the same, which is to prioritise growth in the Regional Growth Centres and allow more moderate levels of growth, based on localised demand in the smaller settlements.

When reviewing the housing allocations for each settlement the Forward Planning Team took account of the fact that each settlement has different occupancy rates and vacancy rates and are also experiencing different levels of demand for development activity. It is considered that this approach will provide a more accurate projection for each respective settlement.

The Council would also highlight that the population projection as set out in the Core Strategy Table is from 2017-2027 whereas the housing allocation is from 2021-2027. In interpreting this Table it is important to note that the housing allocation is not intended to meet the entire projected population increase as this will have been partially met by residential development carried out between 2017-2020 in addition to a natural increase in the existing population.

The Council are satisfied that the population and housing allocations for each settlement are consistent with national and regional policy, are realistic, and are achievable.

### **4. Housing Strategy**

The Council welcomes the comments from the OPR that the amendments to the Housing Strategy and policy objective HOU 3 are acceptable.

#### **Chief Executive's Recommendation:**

No Change



### Summary of Main Issues Raised:

EMRA wishes to acknowledge the work undertaken by the local authority to align with the most up to date Section 28 Guidelines issued. The Assembly also welcomes the overall approach and effort by Louth County Council to coordinate and incorporate policies and objectives, so that they are consistent with national and regional policy.

#### 1.0 Projected Housing Demand

The distribution of housing, which has taken account of the position of the settlement in the settlement hierarchy and the population projection for each settlement is in keeping with the RSES and in particular RPO 3.1.

#### 2.0 Core Strategy

It is unclear how the housing allocations to each settlement have been determined. It is recommended a rationale is provided detailing the basis of housing allocation across the settlement tiers, having regard to sections 4.2 and 4.3 of the RSES.

It is unclear how the Local Authority have considered the quantum of residential land as part of the proposed variation. The quantum of lands zoned are unchanged. It is recommended that additional clarity is provided relating to the quantum of residential zoned land and where appropriate the variation be revised, ensuring the overall quantum of residentially zoned land is in keeping with the population targets outlined as part of the RSES and the HST Guidelines.

#### 3.0 Housing Strategy

The proposed updates to the Housing Strategy and the amendment to policy objective HOU 3 is considered appropriate

### Chief Executive's Response:

#### 1.0 Projected Housing Demand

The Council welcomes the comments from EMRA that the distribution of housing in the proposed variation is in accordance with the growth strategy in the RSES including RPO 3.1.

#### 2.0 Core Strategy

An evidence based approach was taken to the reallocation of housing based on the HST Guidelines. As a starting point the Council took the view that the underlying growth strategy for the Plan would not be altered. In this regard it was not considered necessary to alter the population projection for each settlement. These population projections were taken from the NPF Implementation Roadmap. The HST Guidelines were published in order to ensure a more consistent approach is taken to the projection of housing demand based on the population projections envisaged in the NPF Implementation Roadmap.



The distribution of housing between settlements under the proposed variation took account of a range of factors including the population allocation for each settlement, the position of the settlement in the settlement hierarchy, occupancy and vacancy levels, and recent and projected levels of residential development activity.

Drogheda and Dundalk accounted for 68.3% of the total housing allocation for the County in the adopted County Development Plan therefore it is inevitable that it would be these settlements that would experience the largest reduction in the housing allocation as part of the variation.

Whilst it is acknowledged that Drogheda was apportioned a larger reduction in its allocation than Dundalk it is important to view this in the context that Drogheda had a higher housing allocation than Dundalk in the first instance (3,043 units for Drogheda versus 2,606 units for Dundalk).

This revised allocation must also be viewed in the context of the distribution of the proportion of housing distribution to each settlement. In this context 75% of the housing allocation for the County will be directed to Drogheda and Dundalk under the proposed variation. This is a 6.7% increase on that provided for in the adopted plan.

The Council are satisfied that the revised housing allocations are reflective of the designation of the settlements as a Regional Growth Centre, which will assist in reinforcing the settlement hierarchy in the County. This allocation will allow for an annual average completion rate of 425 residential units per year for the remainder of the lifetime of the Plan (5.75 years). This figure is considered to be realistic and achievable.

In relation to the quantum of residentially zoned lands available it is important that this is viewed in the context of the long term growth strategy of key development centres in the County and in particular the Regional Growth Centres of Drogheda and Dundalk. In order to ensure these settlements are able to fulfil their potential it is critical that there are lands available to facilitate economic and residential growth. Whilst it is acknowledged that there is an excess of residential lands in these settlements it is important there is sufficient flexibility and choice in the lands available so that the growth of the settlements will not be impeded or restricted due to lands not being released for development. This approach is advocated in the RSES and the Draft Development Plan Guidelines.

As part of the implementation of the Core Strategy the Council will be monitoring residential activity and completions in each settlement. If it becomes apparent that the Core Strategy allocation will be exceeded there are policy objectives in the Development Plan to allow appropriate action to be taken.

The Council is committed to securing the strategic objectives of the County Development Plan, ensuring Drogheda and Dundalk can fulfil their potential and become regional drivers of population and economic growth, and facilitating more localised growth in the smaller development centres in the County, in accordance with national and regional policy.

### **3.0 Housing Strategy**

The Council welcomes the comments indicating that the amendments to the Housing Strategy and policy objective HOU 3 are acceptable.



**Chief Executive’s Recommendation:**

No Change

Submission Ref. No. LCDP V1 001

Environmental Protection Agency (EPA)

**Summary of Main Issues Raised:**

It is recommended that available SEA guidance is taken into account in finalising the SEA Screening Determination and incorporate the relevant recommendations as relevant and appropriate to the Variation.

Louth County Council should ensure that the Variation is consistent with the need for proper planning and sustainable development.

The Variation should take into account the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

The Variation should also align with key relevant higher-level plans and programmes and should be consistent with the relevant objectives and policy commitments of the NPF and the RSES.

A copy of the SEA determination should be made available for public inspection at LCC offices and on the LCC website and a copy should be sent to the relevant environmental authorities consulted.

**Chief Executive’s Response:**

As part of the preparation of this Variation Screening for Strategic Environmental Assessment was carried out. This Screening Report concluded that the proposed variation would not be likely to result in significant environmental effects and consequently Strategic Environmental Assessment is not required.

A Screening for Appropriate Assessment was also carried out as part of the proposed variation, which concluded that the proposed variation will not give rise to any effects on the integrity of any European Site, alone or in combination with any other plan and projects and a Stage 2 Appropriate Assessment is not required.

As part of the preparation of these Screening Reports the relevant EPA data sources and tools were utilised and the relevant environmental authorities consulted with.

Screening determinations were placed on public display alongside the other documentation associated with the proposed variation. The proposed variation is consistent with higher level objectives, including those relating to proper planning and sustainable development and climate action.



Any further changes to the proposed Variation will be screened using the same methodology employed to date. Environmental authorities will be informed of the final, adopted variation and associated documentation.

**Chief Executive’s Recommendation:**

No Change

**Submission Ref. No. LCDP V1 002**

**Department of Education**

**Summary of Main Issues Raised:**

The Department notes the proposed amendments to the Core Strategy table.  
It is considered that the potential impact of the changes is not of a significant nature to reassess its school place requirements for County Louth at this time and the Department re-confirms the projected school requirements outlines in its submission to the draft LCDP 2021-2027.

**Chief Executive’s Response:**

The confirmation from the Department that the Variation does not change projected school place requirements within County Louth is noted.

**Chief Executive’s Recommendation:**

No Change

**Submission Ref. No. LCDP V1 004**

**Transport Infrastructure Ireland (TII)**

**Summary of Main Issues Raised:**

No observations

**Chief Executive’s Response:**

Noted

**Chief Executive’s Recommendation:**

N/A



Submission Ref. No. LCDP V1 005	Dublin Airport Authority (DAA)
<b>Summary of Main Issues Raised:</b>	
DAA has no comment to make with regards the proposed Variation.	
<b>Chief Executive's Response:</b>	
Noted	
<b>Chief Executive's Recommendation:</b>	
N/A	

Submission Ref. No. LCDP V1 006	Irish Water (IW)
<b>Summary of Main Issues Raised:</b>	
Irish Water has no objection to the proposed Variation.	
<b>Chief Executive's Response:</b>	
Noted	
<b>Chief Executive's Recommendation:</b>	
N/A	

Submission Ref. No. LCDP V1 007	Office of Public Works (OPW)
<b>Summary of Main Issues Raised:</b>	
Should any changes to zoning designations in areas of flood risk be implemented in future, it is important that a flood risk assessment to an appropriate level of detail is carried out and that there is appropriate justification for any decisions made as set out in the Guidelines.	
<b>Chief Executive's Response:</b>	
The comments from the OPW are noted with regard to any future zoning changes. There are no zoning changes proposed under this Variation.	
<b>Chief Executive's Recommendation:</b>	
No Change	



<b>Submission Ref. No. LCDP V1 008</b>	<b>DAERA - Northern Ireland Environment Agency (NIEA)</b>
<b>Summary of Main Issues Raised:</b>	
<p>DAERA agrees with the responsible authority and the conclusions of the SEA Screening Report that the Plan is not likely to have significant environmental effects and therefore a SEA will not be carried out.</p> <p>DAERA welcome and acknowledge that that the responsible authority has undertaken screening for Appropriate Assessment to ensure the plan is not likely to have significant effects on any Natura 2000 site including those within Northern Ireland.</p> <p>Please note that the collective term of “Natura 2000” sites the network of European protected sites are now known as “National Site Network” sites within the United Kingdom including Northern Ireland.</p>	
<b>Chief Executive’s Response:</b>	
<p>The comments in relation to the considerations and conclusion of the SEA and Appropriate Assessment Screening are noted.</p>	
<b>Chief Executive’s Recommendation:</b>	
<p>No Change</p>	

<b>Submission Ref. No. LCDP V1 009</b>	<b>National Transport Authority (NTA)</b>
<b>Summary of Main Issues Raised:</b>	
<p>The NTA raises some concerns regarding the significant reduction in the number of units being accommodated within Drogheda relative to other settlements. The concerns are raised in the context of the proposed DART+ Coastal North project.</p> <p>The NTA recommends that the Council consider how the reduction in housing allocation for Drogheda aligns with the core principles of the National Sustainable Mobility Policy and how the proposed variation is consistent with the objective to maximise use of existing and planned public transport infrastructure and Government investment priorities.</p>	



**Chief Executive’s Response:**

The County Development Plan 2021-2027 recognises the importance of creating a critical mass of population in order to maximise the return and ensure the economic viability of planned public infrastructure projects including the DART+ Coastal North project.

The Council are satisfied that the revised housing allocation for Drogheda will not restrict or impede the town on reaching the projected population of 50,000 by 2031. Indeed the figure is considered to be realistic and achievable.

If it becomes apparent that the level of development activity in Drogheda is such that this figure may be reached prior to the end of the life of this Plan will consider re-allocating housing from settlements that are under less pressure for development and/or will seek an additional housing allocation from the Department.

**Chief Executive’s Recommendation:**

No Change

**Submission Ref. No. LCDP V1 011**

**Stephen Ward, Planning Consultant**

**Summary of Main Issues Raised:**

It is requested that Variation No. 1 is not adopted at the present time and the matter is revisited at a future date (if required) following a full review of available and up to date information that forms the basis for the variation and only when the Draft Development Plan Guidelines are adopted.

The Variation will serve as an artificial constraint on the supply of much needed new housing in the County and especially the designated regional growth centres of Drogheda and Dundalk.

Concern is raised that the Variation is being brought forward on the basis on outdated population projections and household size rates (ahead of the Census release date of 24<sup>th</sup> June 2022).

**Chief Executive’s Response:**

The housing allocations as provided for in the HST Guidelines and included in the proposed variation are national policy and are required to be implemented as part of the Development Plan process under section 28 of the Planning and Development Act 2000 (as amended).

It is not considered that the revised housing allocations for Drogheda and Dundalk will restrict or impede the growth of these settlements. There is sufficient flexibility regarding the extent of lands zoned to enable housing delivery. The Council will closely monitor the delivery of housing over the lifetime of the Plan.



The response to the submissions from the OPR and EMRA provide further detail on the allocation and distribution of housing between settlements.

The proposed Variation is based on current available population and household data. At the time of preparing this Chief Executive’s Report preliminary census results were published. Taking account of the fact that these figures are only preliminary it is considered prudent to wait until the full census results are published to carry out a more detailed analysis of population and housing trends in the County. The full Census results are to be published periodically during 2023.

**Chief Executive’s Recommendation:**

No Change

**Submission Ref. No. LCDP V1 012**

**Meath County Council (MCC)**

**Summary of Main Issues Raised:**

MCC welcomes the publication of the variation documents and support the approach that Louth County Council are taking.

MCC would welcome engagement, should any alterations to the proposed Variation No. 1 be required, in relation to the settlement of Drogheda.

**Chief Executive’s Response:**

The Council notes the content of the submission and will continue to engage with Meath County Council on the preparation of the Joint Local Area Plan for Drogheda.

**Chief Executive’s Recommendation:**

No Change



## Appendix One

A total of 12 submissions were received by Louth County Council in relation to the Proposed Variation No. 1 of the Louth County Development Plan 2021-2027, as detailed in Table 1 hereunder:

**Table No. 1 – List of Submissions Received**

Submission No.	Name
1.	Environmental Protection Agency (EPA)
2.	Department of Education
3.	Eastern and Midland Regional Assembly (EMRA)
4.	Transport Infrastructure Ireland (TII)
5.	Dublin Airport Authority (DAA)
6.	Irish Water (IW)
7.	Office of Public Works (OPW)
8.	DAERA – Northern Ireland Environment Agency (NIEA)
9.	National Transport Authority (NTA)
10.	Office of the Planning Regulator (OPR)
11.	Stephen Ward, Planning Consultant
12.	Meath County Council (MCC)