

28th October 2021

Frank Pentony
Director of Services,
Louth County Council,
Town Hall,
Crowne Street,
Dundalk,
Co. Louth.
A91 W20C

Re: Adopted Louth County Development Plan 2021-2027

A chara,

The Office of the Planning Regulator acknowledges the adoption of the Louth County Development Plan 2021-2027 by the members of Louth County Council on the 30th September 2021.

The Office welcomes the modifications made in the adoption of the Plan in response to MA recommendation 1-3, in part to MA recommendation 4 and in relation to recommendations 9 and 10. The Office also welcomes the enhanced clarity provided to phasing of development lands in response to MA recommendations 2 and 3 and in respect of the implementation of the tiered approach to zoning in response to MA recommendation 10.

Regarding MA recommendation 1, the Office notes the commitment to prepare a variation to update the Core Strategy to align with the *Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020)*.

In respect of MA recommendation 9, the Office also notes the inclusion of a new Policy Objective in Chapter 10:

IU XX *“The Council will determine how the implementation of the Plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production*

and the potential wind energy resource (in megawatts), within 6 months of making the Plan”.

The planning authority will be aware that under Specific Planning Policy Requirements (SPPR) of the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017), the contribution of the plan in terms of wind energy production (in megawatts) to overall national renewable energy targets are to be set as a positive target for the Plan-period.

The decision of, and reasons given by, the members on MA recommendation 4, concerning the making of the Plan with amendments DLK7, ARD3, L3-2, L5-5, L5-6, L5-8, L5-9 and L5-12, contrary to the recommendation of the Office and the chief executive, are also noted.

While the stated concerns of the Office, in relation to these amendments, remain in respect to the achievement of compact forms of future growth and development of the respective areas, it will be a matter for the planning authority to ensure that the overall policies of the Plan, in tandem with relevant statutory guidelines published by the Minister under section 28 of the Planning and Development Act 2000 (as amended), are applied to ensure the proper planning and sustainable development of these areas.

The Office notes the decision of the members to make the plan without amendments DLK2, DLK6, DLK16, DLK17, DLK21, DLK23 and DLK 32. The Office acknowledges that the lands subject of amendment DLK23, which related to a change of designation of a c.60ha site from A2 New Residential to A3 New Residential Phase 2, are favourably located in terms of compact growth and are consistent with the provisions of the NPF and RSES in terms of supporting the growth of Dundalk as a Regional Growth Centre.

However, as the lands which are subject of amendment DLK23 are not included as phase 1 lands in the Core Strategy, the planning authority must take all necessary steps to maintain the integrity of the Core Strategy of its development plan in any decision it may take to make phase 2 lands available for development over the Plan-period.

Regarding amendments L5-5, L5-6, L5-8, L5-9 and L5-12, the Office notes the reasons given by the members (on L5-12) that rural nodes are not zoned for residential development, per se, but that housing targets are included for these areas as part of rural

countryside under the Core Strategy. Therefore, the Office is satisfied that the above amendments do not materially affect the Core Strategy.

However, the Planning Authority must ensure appropriate housing development within the rural nodes avoids adverse impacts on, inter alia, water quality, traffic safety and amenities through over-development of presently un-serviced areas.

The Office acknowledges the response to MA recommendation 10 in relation to flood risk management in respect of the individual sites, their planning context and the additional policy objective and associated amendments put forward as the authority's current safeguards against flood risk.

The Office notes that the members decided to make the Plan with the provisions for rural backland development under section 13.9.43 of the Plan, against recommendation 10 and MA recommendation 6 of the Office. However, the Office acknowledges the chief executive's proposal to revisit the issue of rural backland development as part of the proposed variation of the Plan to align with the *Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020)*.

Regarding the planning authority's response to MA recommendations 7 and 8, the Office notes the planning authority's stated commitment to safeguarding the capacity and safety to national roads and its recognition of the importance of managing development at or near interchanges to ensure the capacity and efficiency of those interchanges are not compromised.

Taking account of the amendments made to the Plan in response to the input of the Office, the reasons and commitments given in relation to recommendations not presently addressed, the Office is broadly satisfied that the adopted plan sets out an overall strategy for the proper planning and sustainable development for County Louth for the Plan-period.

Finally, the Office would like to acknowledge the commitment of the staff and elected members in progressing the review and adoption of the Louth County Development Plan 2021-2027 at a time of considerable operational challenge due to the Covid-19 pandemic.

In conclusion, the Office welcomes the adoption of the Louth County Development Plan 2021-2027, and looks forward to continued engagement with Louth County Council in the implementation of national and regional policy at the local level.

Is mise le meas,

A handwritten signature in black ink that reads "Niall Cussen". The signature is written in a cursive style and is placed on a light grey rectangular background.

Niall Cussen

Planning Regulator

niall.cussen@opr.ie