



17th June 2022

A/Director of Services,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth,
A91 W20C.

Re: Proposed Variation No. 1 to the Louth County Development Plan 2021 - 2027
(Variation No. 1)

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 1 to the Louth County Development Plan 2021 – 2027 (the proposed Variation).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the proposed Variation 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.

The proposed Variation also updates the Louth County Development Plan 2021 – 2027 to ensure it is consistent with recent changes to Part V of the *Planning and Development Act 2000*, as amended, (the Act) arising from the Affordable Housing Act 2021.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and (2) of the Act and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the Variation to the Louth County Development Plan 2021 – 2027 has been made in a manner consistent with the recommendations of the Office and whether the plan as varied sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one recommendation in respect of the housing supply target (HST) for Drogheda.

1. Core Strategy and Settlement Strategy

The proposed Variation amends a number of tables and sections in the core strategy (chapter 2) including revisions to section 2.6.3 - Projecting Housing Demand to 2027 and Core Strategy Table 2.17.

The Office is satisfied that the HST figure of 6,691 housing units in Table 2.13 is appropriate and acknowledges that the reduced county figure of 6,524 units in Table 2.17 accounts for housing completions in the county in Q4 of 2021 as detailed in the CSO Housing Completions data.

The Office can confirm, therefore, that the planning authority's HST forecast for the plan period is in accordance with the Guidelines methodology.

1.1 Housing Supply Target - Drogheda

The Office notes, however, that the biggest reduction in housing targets proposed in the variation relates to Drogheda which, together with Dundalk, is a designated Regional Centre in the National Planning Framework (NPF) with a key role in terms of building stronger regions and accessible centres of scale. The rationale for this approach is not clear given the national and regional policy framework for the growth of the town.

National Policy Objective (NPO) 2b of the NPF states that the regional role of the Drogheda-Dundalk-Newry cross-border network will be identified and supported in the RSES with the aforementioned also being a focus in terms of strengthening Ireland's overall urban structure (NPO 7 refers).

Page 61 of the RSES outlines the key priorities for Drogheda, which are '*to promote the continued sustainable and compact growth of Drogheda as a regional driver of city scale with a target population of 50,000 by 2031*'.

This population growth target is referenced at section 2.4.4 (Louth's Growth Strategy) in the Louth County Development Plan 2021 – 2027 which states:

The focus of the growth strategy for County Louth is as outlined hereunder:

- *Prioritise targeted population and economic growth to the designated RGCs of Drogheda and Dundalk. Promote their continued sustainable and compact growth as regional drivers to city scale, with a target population of 50,000 by 2031 supported by improvements to sustainable transport links and the requisite infrastructure to enable the towns grow to their full potential by becoming more attractive to live and invest in...*

Having regard to Drogheda's regional role and significant population target, the Office considers that the rationale for the significantly reduced housing supply target of 20% for Drogheda over the plan period should be clearly set out. Furthermore, it is also considered necessary that the planning authority demonstrates that the reduced housing target will not impact on Drogheda's ability to reach its RSES population target.

Recommendation 1 – Housing supply target for Drogheda

Having regard to National Policy Objective (NPO) 2b which supports developing accessible centres of scale, NPO 7 which supports strengthening Ireland’s overall urban structure, the population target for Drogheda in section 2.4.4 – Louth’s Growth Strategy of the Louth County Development Plan 2021 - 2027 and the key priorities for the Regional Growth Centre of Drogheda set out in section 4.5 of the Regional Spatial and Economic Strategy which ‘...*promote the continued sustainable and compact growth of Drogheda as a regional driver of city scale with a target population of 50,000 by 2031*’, the planning authority is required to provide justification for the significantly reduced housing target of 20% for Drogheda over the plan period 2021 – 2027.

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.

1.2 Settlement Hierarchy and distribution of population growth

The Office notes that the proposed Variation does not propose any changes to the settlement hierarchy set out in the Louth County Development Plan 2021 – 2027.

Core Strategy Table 2.11¹ in the Development Plan sets out the current distribution of future population across the tiers to 2027. The Office notes that the planning authority has not updated column D – projected population increase to 2027 for the various settlements / tiers in the revised Core Strategy Table 2.15 to reflect the amended housing targets.

This results in some inconsistencies between the population and housing growth figures and the planning authority is advised to review the future population figures for the individual settlements / tiers in column D so that they are consistent with the respective HST figure in column F.

¹ Chapter 2, page 20 of the Louth County Development Plan 2021 - 2027

2. Housing Strategy

The proposed Variation aims to make changes to Chapter 3 (Housing) and the Housing Strategy in Appendix 3 of the Louth County Development Plan 2021 – 2027.

The Office notes that the Housing Strategy was originally prepared in August 2020 and was subsequently revised in March 2022 to account for and incorporate the Housing Supply Targets consistent with the *Housing Supply Target Methodology for Development Guidelines for Planning Authorities (2020)*.

The revisions to the Housing Strategy include amongst others, a new section 1.5 titled Housing Supply Target Methodology for Development Plan, updates to the text, tables and figures in Section 4.0 – Housing Needs in Louth and an update to the housing strategy objectives in Section 6.0.

The Housing Strategy objective regarding Part V of the Act is updated to ensure consistency with the changes to requirements for social and affordable housing provision introduced in the *Affordable Housing Act 2021*. In this regard, it is also proposed to amend Policy Objective HOU to read:

To apply a social and affordable housing requirement in accordance with the requirements of Part V of the Planning and Development Act 2000 (as amended).

The Office has assessed the proposed changes to Chapter 3 including Policy Objective HOU and the Housing Strategy and concludes that no recommendations or observations are warranted.

Summary

The Office requests that your authority addresses the recommendation and matters outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 13 of the Act must summarise any recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within five working days of the decision of the planning authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by

this Office, then the chief executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
