

December 19th, 2022

Planning Department,
Longford Co Council,
Aras an Chontae,
Great Water Street,
Longford.

Re: Residential Zoned Land Tax

A Chara,

With reference to your notice in the Longford Leader a number of weeks ago pertaining to the above and facilitating the making of submissions in response to the associated published Residential Zoned Land Tax (RZLT) Draft Map, I wish to declare my interest (as owner) in relation to 2 identified plots, as follows:

LDLA202207078 - to be referred to as "**Plot A**" for the purposes of this submission, and,

LDLA202207219 - to be referred to as "**Plot B**" for the purposes of this submission.

Both plot A and plot B are located in relatively close proximity to each other (not adjacent) on the Eastern fringe of Lanesborough Town and both front onto the North side of the main Lanesborough to Ballymahon road (R392).

Map no. 1 below shows both plots on the Draft RZLT Map as published by Longford Co Council.

Map no. 2 depicts both plots in context of the current Lanesborough Zoning Map – an extract from the current Longford County Development Plan, 2021 to 2027. Notably, both plots are zoned for residential development – Plot A as "Residential" and Plot B as "New Residential".

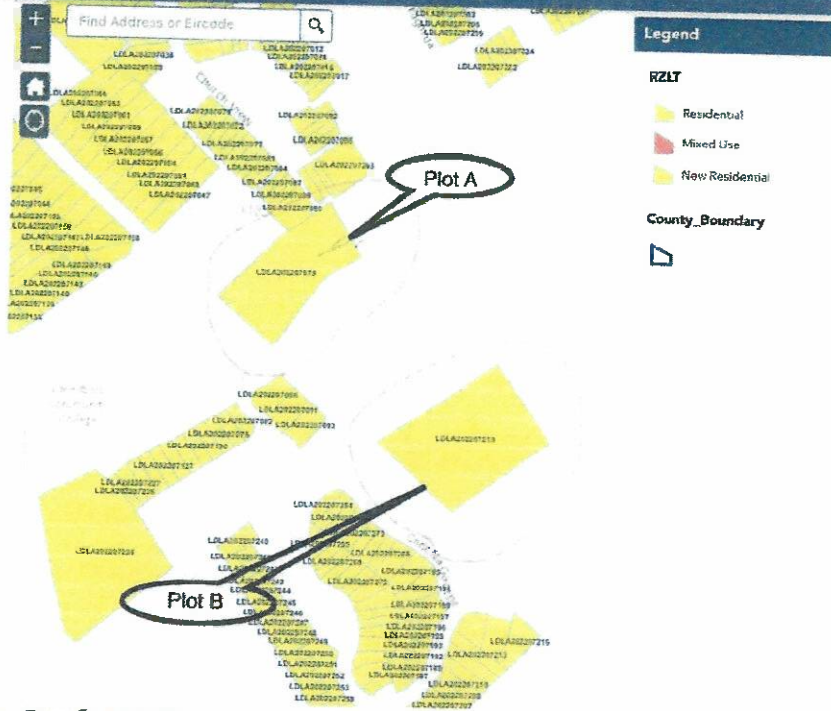
Residential Zoned Land Tax

Action 15.2 of Housing for All specifically identifies the introduction of a new tax to activate vacant land for residential purposes (to replace the current Vacant Site Levy).

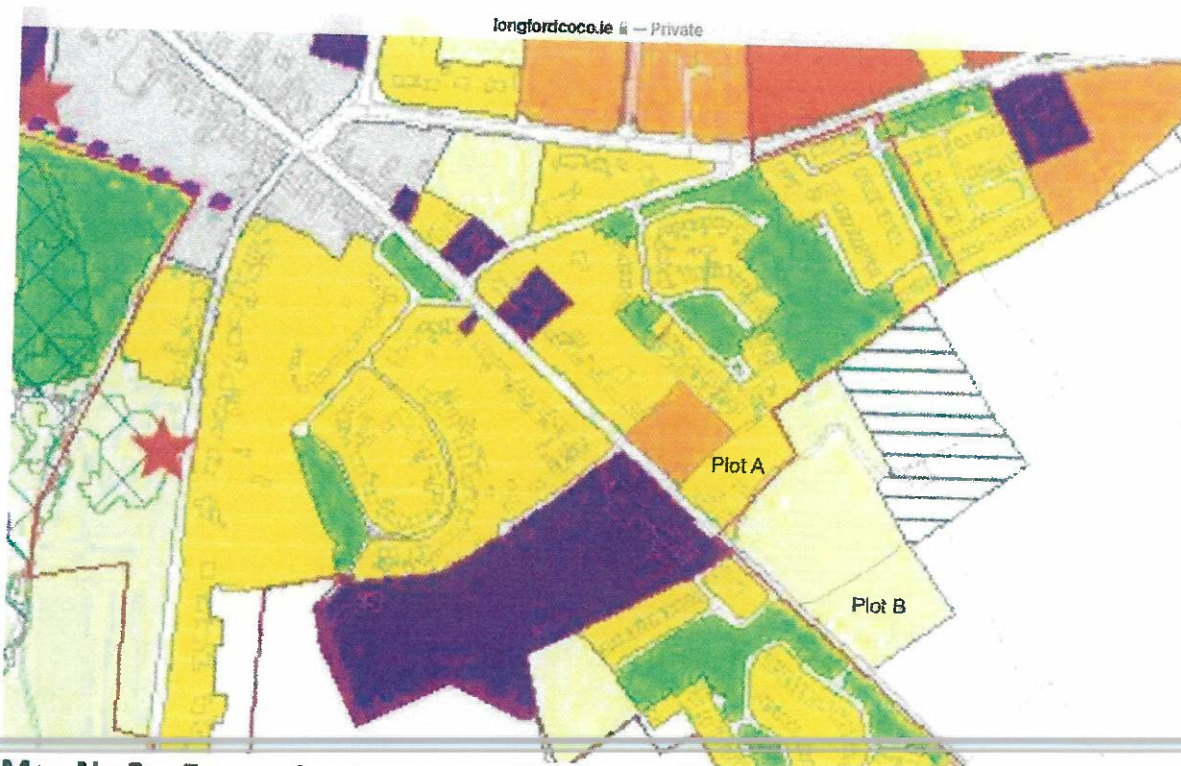
The purpose of the proposed measure is to activate existing planning permissions and zonings where housing is permitted and where the land is connected to, or has access to services, but remains undeveloped. It is primarily intended to influence behaviour towards increased housing output.

The legislation supporting the measure clearly sets out that land in scope will be zoned for residential development or a mixture or uses including residential, be serviced or have access to servicing by water wastewater, road, footpath and public lighting; and not be affected by contamination or significant archaeological remains which would preclude development taking place.

A number of exemptions are also set out within the provisions, and while existing permanently occupied residential dwellings will be indicated on the maps where dwellings are located within a residential zoning, **homes are not within the scope of the tax and the owners of such properties will not be liable for this tax.**



Map No 1 – Extract from Draft RZLT map



Map No 2 – Extract from current Lanesborough Zoning map

Purpose of Submission:

In general terms, the purpose of this submission is to articulate my fundamental objection to the inclusion of both Plot A and Plot B on the Draft RZLT map for County Longford and to demonstrate why such an inclusion is both inappropriate and unfair. I do so on the basis that I have done nothing to warrant the imposition of RZLT and such an imposition would constitute an unprovoked significant imposition on my livelihood.

Lest there be any doubt about my stance regarding the need and justification for the large-scale development of housing Nationally, I wish to emphasise that I fully understand and support such an objective and I am absolutely empathetic and sympathetic towards the plight of the many homeless people and home seekers across the country who so desperately need solutions. I'm happy to contribute to the resolution of this enormous problem in any way I can in practical terms but, as I'll demonstrate in what follows, this is not about NIMBYism (Not in my back yard) or self betterment, but rather about saving part of the valued heritage of my parish and my own cherished livelihood.



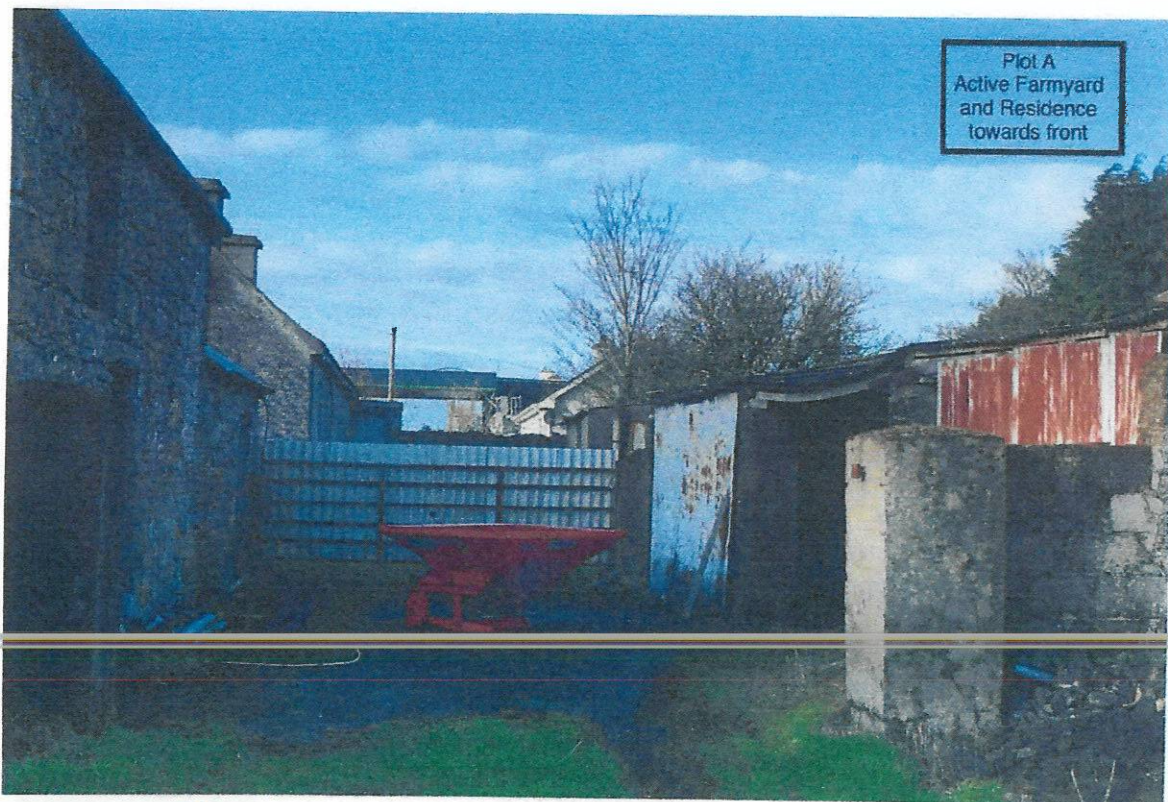
Photograph No 1

Set out hereunder are my rationale for requesting that both Plot A and Plot B be excluded from the Draft County Longford RZLT map before it is finalised in due course.

Plot A:

Plot A (RZLT map ref.: **LDLA202207078**) fronts onto the **R355**, is 0.49 hectares in area and is presently designated as "Residential" under the Longford County Development Plan, 2021 to 2027. The depth of the plot is approximately twice that of its width – thus implying that its road frontage length is approximately 50m. In practical terms, the plot has 2 separate functions at present.

The front portion, which extends backwards from the **R355** for a distance of approximately 40m and is rectangular in shape across the entire width of the plot is an existing residential property which also functions as a farmyard in support of my adjacent farming land which extends to the East and North. See Photograph No 1 above which shows the afore-mentioned residence in relation to which records will show that Local Property Tax (LPT) is discharged on an annual basis and is fully paid up to date – **2021-2022**. Photograph No 2 shows some of the outbuildings, farm machinery, etc. set against the rear of the dwelling (background left) shown in Photograph No 1.



Photograph No 2

Needless to say, this residential/farmyard portion of Plot A is a critical part of what I do in terms of my livelihood as a livestock farmer.

The remainder of Plot A which occupies almost 60% of the overall area is of great historical and heritage significance. The old Roman Catholic Parish Church once stood close to the Western boundary and adjacent to the rear boundary of the afore-mentioned residential/farmyard component of the plot – regrettably, there is little surviving evidence of the church but there is evidence of the cemetery which occupied the area outside of the church building and extending to the Northern, Western and Eastern boundary walls of the plot. This area – the site of the old church and cemetery – was in Church ownership until the early part of the 19th century. The existing RC St Mary's Parish Church, just a few hundred metres to the North West replaced it and continues to provide for the needs of the RC congregation of Lanesborough since its construction was completed in 1834. According to a local eminent and highly respected historian, [\[Name redacted\]](#), the site for St Mary's was agreed upon locally by virtue of the fact that part of the roof of the old church in Plot A was blown off during an extremely violent storm in the early 19th century to land on it (the new church site) once the severe winds had abated.



Photograph No 3

Photograph Nos 3 and 4 show sections of the old stone boundary wall pertaining to the old church and cemetery grounds – clearly, the nature and quality of the construction of this boundary is consistent with what one would expect in relation to such eminent parish supporting facilities and is certainly vastly superior to what one would expect as part of a farming related boundary.



Photograph No 4

Photograph Nos 5, 6 and 7 relate to the fact that this is the site of an old cemetery which we know was functional through significant eras of the 18th and 19th centuries. Photograph No 5 is of the headstone which is the dominant feature of the cemetery and is located quite centrally. Photograph No 6 is a close-up of the same headstone on which one notes that it is dated 1787 and it marks the resting place of a parish clergyman of the time, *Rev. John Maguire*. Photograph No 7 is of what appears to be a segment of a headstone built into the rear facing wall of the dwelling house referred to above towards the front of Plot A. More than likely the headstone, which is dated 1821 and records the memory of another clergy man, *Rev. John Maguire* was retrieved from a state of damage/abandonment within the cemetery – possibly by a member of a previous generation of my family or a more previous occupier of the dwelling.



Photograph No 5

According to the afore-mentioned eminent historian, *Mr [redacted]*, the strong likelihood is that excavation of the site would uncover wide ranging evidence of the existence of the cemetery. Clearly, the quality of the headstones allocated to clergy was such that they stood a much better chance of survival than those allocated to regular parishioners.

I represent the third generation of the *[redacted]* family to own and occupy Plot A – my grandparents first took occupancy of the property approximately 100 years ago. As is evidenced by the afore-mentioned headstone of *[redacted]* (Photograph No 7), my family had a strong empathy with the significance of the church grounds and cemetery within its ownership and responsibility and this empathy has continued to the present day under my own stewardship. I continue to be conscious and respectful of this sacred ground and, while in my family's ownership, it has never been disturbed and it is my intention that this will continue to be the case.

Taking all of the foregoing into account, I am firmly of the view that Plot A should not be considered further as a site to facilitate more residential accommodation than already exists there. To do otherwise would destroy a much valued local heritage site and cause serious disruption to my livelihood which, at this stage of my life, I would find very difficult to sustain.



Photograph No 6



Photograph No 7

Plot B:

Plot B (RZLT map ref.: **LDLA202207219**) fronts onto the [redacted] is 0.69 hectares in area and is presently designated as "New Residential" under the Longford County Development Plan, 2021 to 2027. Its road frontage length is approximately 75m, it is approximate trapezoidal in shape and its average depth is just over 90m.

The plot is part of my farm, is good quality land in terms of its capacity to support livestock rearing and is an asset of some considerable value to me in terms of its role in providing me with a livelihood.

I'm a modest farmer and since my school going days, my land holding has been the sole source of my livelihood. Farming is all I know. Now in my early 60's, I am not in a position to alter the manner in which I make a living.

I have never, at any time, sought that my land should be designated or zoned to facilitate the development of housing and was surprised to discover that such a designation is incorporated in the Development Plan. If I had made representations in this regard, I could fully accept the reasonableness and expectation that I should be asked to pay RZLT in the event that I don't act on my declared intentions pursuant to such representations. However, the suggestion (totally unprovoked on my part) that this tax should be imposed on me is, I feel, an unfair and unjust imposition on my right to adequately sustain my livelihood. Notwithstanding the foregoing, I fully appreciate the right of the Council to designate zoning status to lands and as my retirement from farming approaches in due course, I will probably be more favourably disposed to facilitation of residential development on my land.

Furthermore, I feel that I have already been very accommodating in terms of facilitation of residential development. Some years ago, I facilitated the developers of the [redacted] housing scheme, which is located directly across the [redacted] from Plot B, by allowing them construct the foul sewer connection for the development through my land – the said sewer line runs adjacent to the Western fringe of Plot B before gravitating onwards towards the towns sewer network. The sewer is 150mm in diameter and so is scarcely adequate to accommodate the needs of [redacted] by implication, it would not be appropriate to assume that it would be adequate to facilitate the additional loading that would evolve as a result of the development of housing in Plot B.

In the Longford County Development Plan, 2021 – 2027, Lanesborough is categorised as a “Self-Sustaining Town” which, as defined in the Plan “relates to high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.” Clearly, if Lanesborough is to become “more self-sustaining”, the priority must be to succeed in securing “targeted ‘catch up’ investment” rather than encourage further population growth which would merely result in less rather than more self-sustainability and a denial of the achievement of the key objective.

Taking the foregoing into account, I am of the view that Plot B should be excluded from the draft RZLT Map for Co Longford and I am requesting that the map to be finally adapted for RZLT purposes should not incorporate it.

Conclusion:

In summary, I am requesting that both Plot A (RZLT map ref.: **LDLA202207078**) and Plot B (RZLT map ref.: **LDLA202207219**) be excluded from the draft RZLT Map for Co Longford on foot of the points articulated in the foregoing sections of this submission and, accordingly, that neither will be subject to the imposition of the evolving new tax.

My thanks for your consideration of this – I look forward to your response in due course.

Yours Sincerely,



OS Map Ref :- 2417-C

Scale :- 1 : 2,500

Location :- Lanesboro

Draft RZLT Map
Ref
LDLA202207078
(Plot A)

Draft RZLT Map Ref
LDLA202207219
(Plot B)

Air Check
Kerock

North

