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Director of Services,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth
A91 W20C

Date: 27th July 2021
JSA Ref: 18251

Dear Sir/Madam,

RE: SUBMISSION TO THE PROPOSED MATERIAL AMENDMENTS TO THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 ON BEHALF OF BREEN HOLDINGS (MATERIAL AMENDMENT DLK23)

1.0 INTRODUCTION & EXECUTIVE SUMMARY

- 1.1 On behalf of our client, Breen Holdings, we wish to make a submission in respect of the proposed Material Amendments to the Draft Louth County Development Plan 2021-2027, and in particular Material Amendment No. DLK23
- 1.2 Breen Holdings are the owners of a substantial land holding of c. 38ha. (94 ac.) at Mount Avenue, Dundalk, as shown on Figure 1 below. A Master Plan and development proposals for these lands is currently under preparation.
- 1.3 As demonstrated below, these lands are ideally placed to meet the objectives of national, regional and local planning objectives. Specifically, through the delivery of housing within appropriately zoned lands adjacent to the settlement of Dundalk.
- 1.4 Under the Draft Louth County Development Plan 2021-2027, as published earlier this year, Breen Holdings lands at Mount Avenue were zoned **A2 New Residential**. This is shown on Figure 3 below, with lands outlined in red. Under the proposed Material Amendment Ref. DLK 23 it is proposed to change the status of these lands to **A3 New Residential Phase 2**.

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- 1.5 If this zoning objective for the lands is maintained, it means that our client's lands could not be brought forward for residential development during the lifetime of the Louth Development Plan 2021-2027, unless Phase 1 zoned lands failed to be developed in the next 3-4 years.

2.0 POLICY BACKGROUND

National Planning Framework (NPF) 2040

- 2.1 The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.
- 2.2 As a strategic development framework, Ireland 2040 sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.
- 2.3 The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. The NPF identifies that activating 'strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development' as a top priority. Section 2.6 of the NPF seeks to ensure compact and sustainable growth.
- 2.4 National Policy Objective 3a of the NPF states that it is a national policy objective to *"deliver at least 40% of all new homes nationally within the built up envelope of existing urban settlements"*.
- 2.5 National Policy Objective 33: *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*
- 2.6 The NPF also sets out a two-tier approach to land zoning in Appendix 3. NPO 72a states:
- "Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan."*
- 2.7 The subject lands meets the definition of Tier 1 Serviced Zoned Land:
- "This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services. Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement."*
- 2.8 The subject lands can support the achievement of these NPF objectives in the short term, in particular within the principles of compact growth and the reinforcement of the country's existing urban structure at all levels. Where housing policy is concerned, a development on the subject lands would be in accordance with the NPF's core

principles for housing delivery – in particular as the location of new housing is prioritised in existing settlements.

Regional Spatial Economic Strategy – Eastern and Midlands Regional Assembly (2019-2031)

- 2.9 The Regional Spatial and Economic Strategy – Eastern and Midlands Regional Assembly is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond. The principle function of the assembly is the delivery of a Regional Spatial and Economic Strategy (RSES), a new concept in Irish planning where not only the spatial but also the economic factors that go into the future of the region are brought together into one all encompassing strategy.
- 2.10 The primary status of the RSES is to support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP) and the economic policies and objectives of the Government by providing a long term strategic planning and economic framework for the development of the region.
- 2.11 Dundalk is classified as a Regional Growth Centre which are defined as large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.
- 2.12 Dundalk is targeted in the RSES as a key location for substantial population growth, with residential development at Mount Avenue specifically referenced in the RSES, stating:

“Sustainable urban expansion will be delivered through the development of the Mount Avenue area and other lands, supported by associated enabling infrastructure.”

- 2.13 As clearly set out, the subject lands can support the achievement of these objectives and is entirely suitable for residential development in the short term. Not alone is Dundalk town targeted for growth in the RSES, but that the Mount Avenue area of the town has been explicitly identified as one of the key areas where this growth should take place.

Rebuilding Ireland – Action Plan for Housing and Homelessness

- 2.14 Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector.
- 2.15 Rebuilding Ireland is set around 5 no. pillars of proposed actions summarised as follows:
- Pillar 1 – Address Homelessness:** Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.
 - Pillar 2 – Accelerate Social Housing:** Increase the level and speed of delivery of social housing and other State – supported housing
 - Pillar 3 – Build More Homes:** Increase the output of private housing to meet demand at affordable prices.
 - Pillar 4 – Improve the Rental Sector:** Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

Pillar 5 – Utilise Existing Housing: Ensure that existing housing stock is used to the maximum degree possible – focusing on measures to use vacant stock to renew urban and rural areas.

- 2.16 The subject lands are capable of delivering much needed housing within an existing settlement in accordance with the aims of Rebuilding Ireland, and in particular Pillars 2, 3 & 4 to accelerate social housing, build more homes and improve the rental sector. The development of these lands for housing would substantially add to the residential accommodation availability in the area and cater for the increasing housing demand. Such residential development would also contribute to the quantum of new social and affordable housing units available to the Council through the Part V agreement which is consist with Pillar 2.

3.0 BREEN HOLDINGS LAND

- 3.1 Breen Holdings are the owners of a substantial land holding of c. 38ha. (94 ac.) at Mount Avenue Dundalk, as shown on Figure 1 below.
- 3.2 The lands are greenfield in nature and located to the west of Mount Avenue. The lands are highly accessible both to existing public transport facilities, as well as to the national road network, at approximately c.2 km north west of Dundalk town centre, c.1.9 km from Dundalk train station and 600 m from an interchange with the M1.
- 3.3 In 2017, under the Local Infrastructure Housing Activation Fund (LIAF), funding was provided by the Department to Louth County Council to enable the Council to upgrade and realign the Mount Avenue Road. The purpose of LIAF funding is to unlock and bring forward for development other residentially zoned land within the vicinity in the short term. The Breen Holding lands are such lands which will be facilitated by this LIAF funding.
- 3.4 A Masterplan for these lands has been prepared, and a number of pre-applications meetings have been held with Louth County Council, and the design work is well advanced to enable a planning application to be lodged later this year which can provide for approximately 1,400 No. high quality residential units.

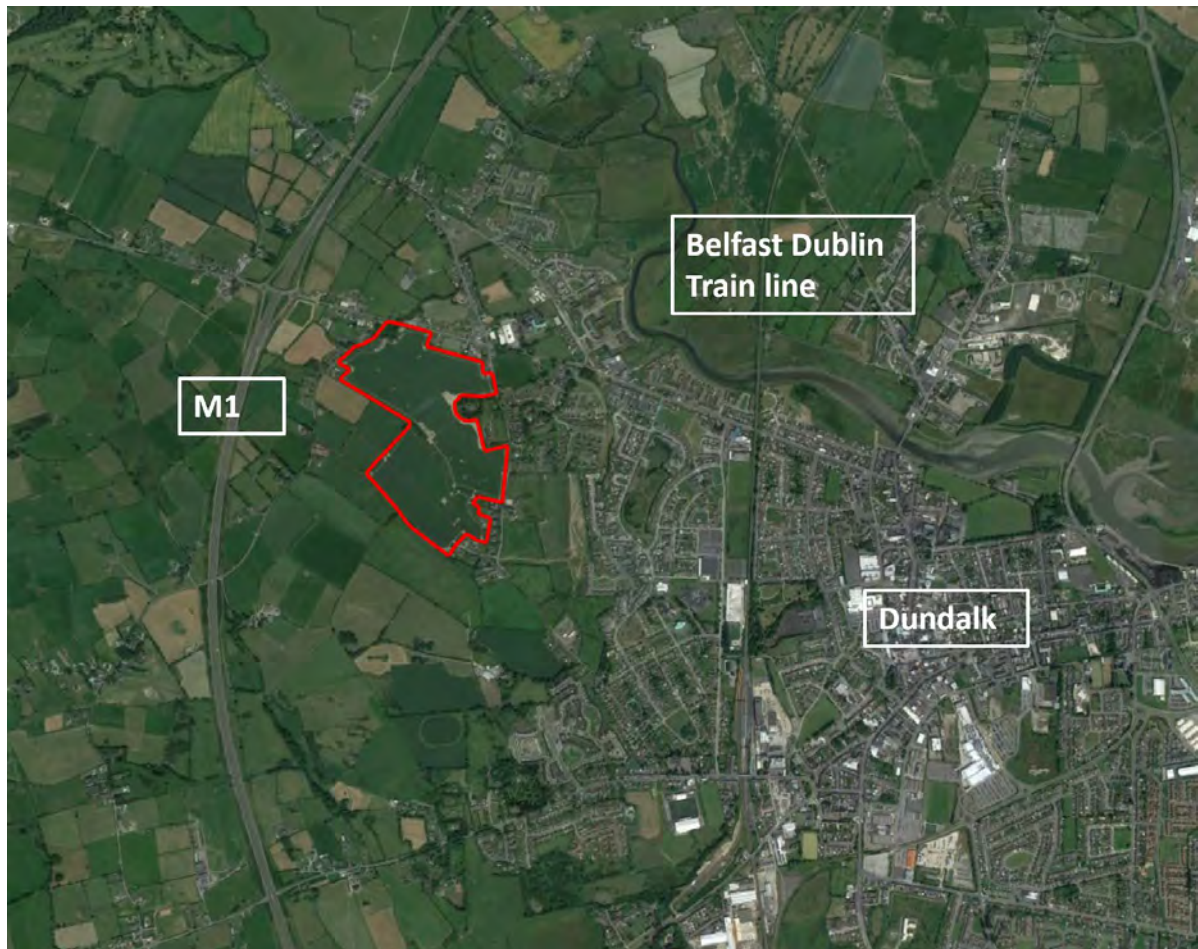


Figure 1: mount Avenue lands in the Dundalk context (Source: Google Maps, 2021).



Figure 2 Breen Holding Lands at Mount Avenue Dundalk (Source: OMP).

- 3.5 Under the Draft Louth County Development Plan 2021-2027, as published earlier this year, Breen Holdings lands at Mount Avenue were zoned A2 New Residential. This is shown on Figure 3 below, with lands outlined in red.
- 3.6 Subsequently in June this year Louth Council proposed a number of Material Amendments to the Draft Plan, including the changing of the proposed zoning of much of the residentially zoned land, by the introduction of phasing. In respect of Breen Holding lands at Mount Avenue, the proposed Material Amendments propose to zone these lands A 3 New Residential Phase 2 (Material Alteration No. DLK23). No rationale as been provided by the Council in this regard and the proposed change is contrary to the objectives of the Development Plan itself, National and Regional Guidelines.
- 3.7 These proposals are shown on Figure 4 below, with the subject lands again outlined in red.

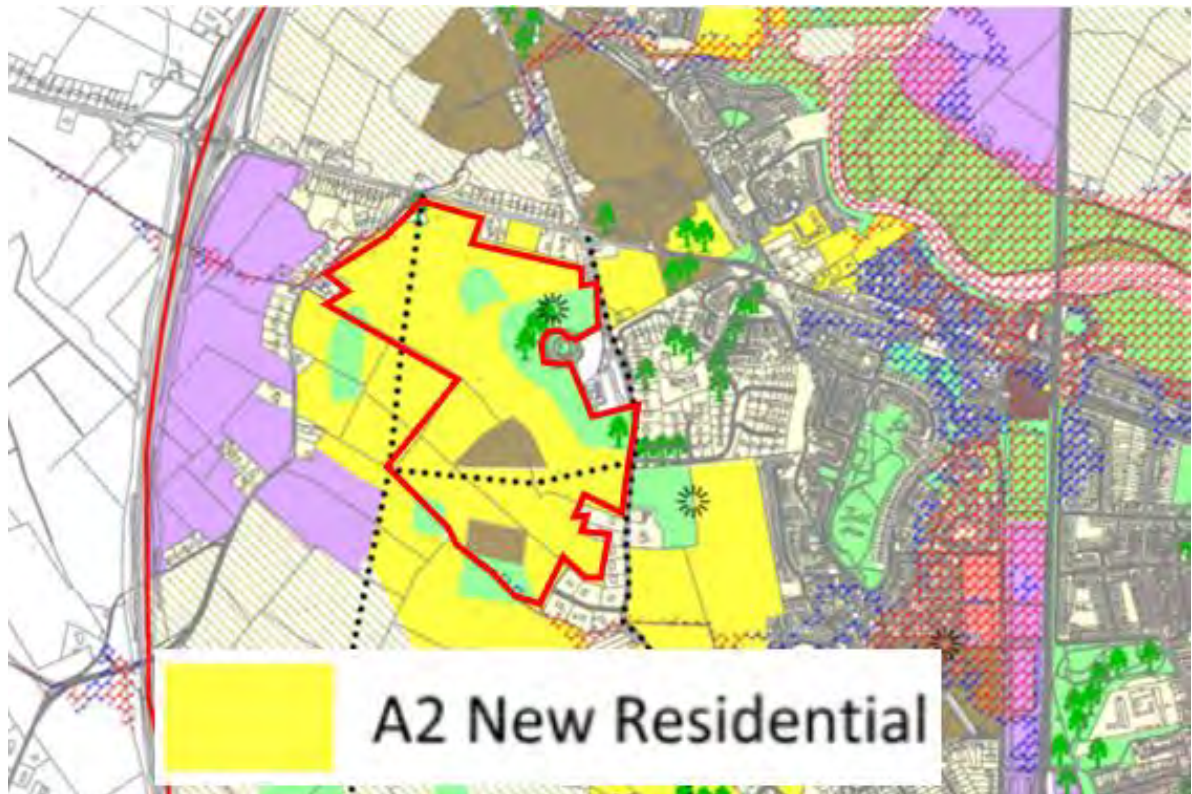


Figure 3 Draft Louth Development Plan – Dundalk Zoning Map before Material Alterations

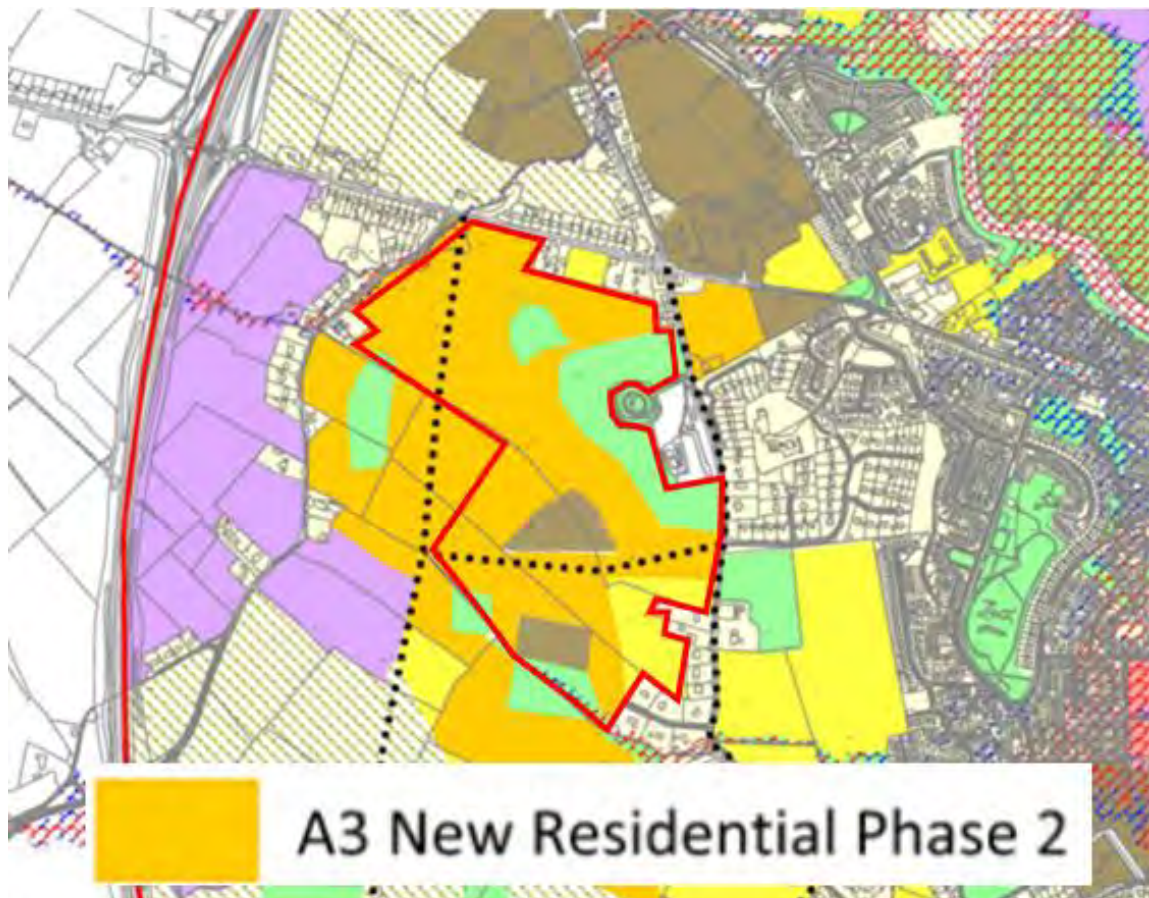


Figure 4 Proposed Material Amendments – Dundalk Zoning Map

- 3.8 As set out within the proposed Material Amendments a Masterplan is under preparation for the subject lands:

“Mount Avenue Master Plan – this consists of an area of c.38 hectares of land to the north-west of Dundalk Town Centre with frontage onto Mount Avenue, Greyacres Road, and Castletown Road. The lands are zoned for residential and open space uses with a Local Archaeological Heritage Site of national importance also located within the Master Plan area. The key principles of any Master Plan will be to establish a coordinated approach to the development of the lands that will include a mix of housing options that will support a sustainable community, the provision of a linear park, the provision of education facilities, and local neighbourhood and community facilities. The Master Plan shall include provision for the delivery of new/upgraded road infrastructure including new Link Roads within the Master Plan area and shall demonstrate how this road will tie in with the alignment of Link Roads outside of the Master Plan area.”

4.0 REQUESTED AMENDMENT TO POPOSED MATERIAL AMENDMENTS

- 4.1 If this zoning object for the lands is maintained, it means that the Breen Holding lands could not be brought forward for residential development during the lifetime of the Development Plan 2021-2027, unless Phase 1 zoned lands failed to be developed in the next 3-4 years.
- 4.2 As set out in Draft Plan Dundalk is projected to experience a 36.3% growth in population with a housing allocation of 2,606 no units (Table 2.14 Core Strategy). **The Material Alterations have over halved the new lands in Dundalk zoned residential from 213 ha to 89.4 ha.**
- 4.3 The Draft Louth Development Plan Core Strategy states:

Policy Objective	
CS 6	Direct and consolidate the majority of the County’s future population growth into the strong and dynamic Regional Growth Centres of Drogheda and Dundalk in line with the objectives of the Regional Spatial and Economic Strategy and in accordance with the Core and Settlement Strategies of the Development Plan.

Policy Objective	
CS 7	Support the Regional Growth Centres of Drogheda and Dundalk as regional economic drivers targeted to grow to city scale with a population of 50,000 by 2031 and capitalise on their strategic location on the Dublin-Belfast Economic Corridor.

- 4.4 Further, the overall objective for Chapter 3 Housing is:

“To facilitate the provision of a high quality, suitable mix of adaptable, lifetime housing that meets the needs of all residents in the County; based on the principles of place making, compact growth, and healthy, sustainable communities where housing is close to services and where sustainable modes of transport can be facilitated.

- 4.5 The proposed zoning change to the subject lands as set out in the Proposed Material Amendment (Ref DLK 23) is not consistent with the Draft Louth Development Plan 2017-2021 wider Core Strategy and housing policy for County Louth.

4.6 It is respectfully requested that the Breen Holding lands at Mount Avenue Dundalk, extending to 38 ha. be rezoned as **A2 New Residential Phase 1** for the following reasons:

- The lands are Tier 1 as defined in the NPF, being already fully serviced with the necessary physical infrastructure to support residential development.
- Lands at Mount Avenue were explicitly identified in the RSES as being one of the key locations where future housing should be located in Dundalk.
- The lands are well located to support the orderly and sequentially sustainable development of a Regional Growth Centre.
- The lands are highly accessible both to existing and proposed public transport facilities, as well as to the national road network.
- Mount Avenue is being upgraded with the assistance of the Local Infrastructure Housing Activation Fund (LIAF). The purpose of LIAF funding is to unlock and bring forward for development other residentially zoned land in the short term.
- The development of these lands will facilitate the completion of the Mount Avenue upgrade, by permitting the completion of a new north-south distributor road to connect with the Castletown Road.
- These lands are ready to be developed in the short term. Following close engagement with the Planning Authority a Masterplan for these lands has been prepared, and the design work is well advanced to enable a planning application to be lodged later this year.
- These lands can accommodate in the order of 1,400 No. high quality residential units, which can significantly contribute to meeting Dundalk's needs for social, affordable and private housing in the short term.
- The development of these lands will facilitate the achievement of the stated Development Plan roads objectives for the area of having new east-west and north-south link roads developed in the area.

5.0 CONCLUSION

- 5.1 As a significant landholder in Dundalk, Breen Holdings is committed to bringing forward the subject lands extending to 94 acres for residential development in the lifetime of the new County Development Plan. The Material Alterations will undermine the Core and Settlement Strategy in the Draft Louth Development Plan and in wider National and Regional Policy to deliver more housing at sustainable locations, such as Mount Avenue.
- 5.2 As set out within this submission, the subject lands are already fully serviced with the necessary physical infrastructure to support residential development; the lands are well located to support the orderly and sequentially sustainable development of a Dundalk, a Regional Growth Centre; and the lands are highly accessible both to existing and proposed public transport facilities, as well as to the national road network.
- 5.3 These lands have been identified in the Regional Spatial & Economic Strategy as one of the principle locations within which the future growth of Dundalk should be located, and the Government have already provided LIAF funding to upgrade the Mount Avenue road to facilitate the development of these and other lands in the area for residential use. Therefore, it would be contrary to both national and regional policy for these lands at Mount Avenue, not to be appropriately zoned to accommodate residential development during the period of the new County Development Plan.
- 5.4 In summary, the subject lands are ideally situated to deliver future residential development in Dundalk, and accordingly we respectfully request that the subject lands be changed back to being **A2 New Residential Phase 1, and that proposed Material Amendment DLK 23 not be adopted.**
- 5.5 We trust that the Planning Authority will consider the contents of this submission in the preparation of the finalised Louth County Development Plan 2021-2027.