

Comhairle Contae LU  
10 DEC 2020  
Oifigi an  
Príomhfeidhmeannach

Frank Burke & Associates  
Baldara  
Trim Road  
Navan  
Co. Meath

To/  
Miss Joan Martin, County Manager  
Louth Co. Co.  
County Offices  
Millenium Centre  
St. Alphonsus Road  
Dundalk  
Co. Louth  
3-12 -2020

**Re: - Zoning Proposal for lands at Priorland, Crumlin and Fairhill as part of the Dundalk & Environs Development Plan under the Louth County Development Plan 2021-2027**

Dear ~~Sr~~, *MS*,

Louth County Council has published draft zoning proposals for the Dundalk and Environs area recently as part of the review of the Louth County Development Plan 2021-27. With this in mind, on behalf of Patrick Bishop of \_\_\_\_\_, we are making a submission to the Council to change the zoning proposals for the land in the ownership of Mr. Bishop from that currently proposed to what was previously zoned.

The lands that are the subject of this submission are located in the townlands of Priorland, Crumlin & Fairhill. These lands are zoned in the current development plan for Dundalk, i.e. Dundalk and Environs Plan 2019 -2015. Further the afore-mentioned townlands are specifically identified for development in the Dundalk Southwest Local Area Plan 2006 and Dundalk Gateway –New Development Plan 2009 -2015. The proposal in the draft plan is to zone these lands as Strategic Reserve (L1). *We are requesting that Louth County Council retain the existing zoning which are Mixed Use (EM) & Residential 2 (Res 2) as set out in the existing Dundalk and Environs Development plan. The latter would equate to New Residential (A2) in the Draft Plan.* We would further comment that the zoning set out in the Mullagherlin Framework Plan would support our submission.

In support of the above, please find enclosed our detailed submission, setting out our case for the retention of the existing zoning. We would add that the subject lands are shown on the maps included in the submission. In summary, the subject lands are ideal for immediate development and can be connected to existing services and abut lands in complementary use. We would further comment that my client has had approaches from a number of third parties trying to acquire sections of the holding for development but given the strategic location of the lands as set out in the Dundalk Gateway plan, he has not been tempted to sell as the proposed development were not up to gateway standard.

As development plans and associated zoning are a reserved function of the members, we would be obliged if this request could be put on the agenda for the meeting of the Council at which submissions on the Draft Plan are listed for consideration. Please acknowledge receipt of this submission both to me and to my client at the address listed above.

Sincerely,



Frank Burke  
Chartered Engineer

Encl.: - Submission

## **Submission for the Zoning of Lands at Priorland, Crumlin & Fairhill, Dundalk, Co. Louth for Patrick Bishop**

### **1.0 Overview**

This application relates to lands located on the southern outskirts of the town of Dundalk in Co. Louth in the townlands of Priorland, Crumlin & Fairhill. The lands lie within the jurisdiction of Louth County Council, but are located within the area covered by the current Dundalk and Environs Development Plan 2009 -2015. Pat Bishop owns all of the land that is the subject of this application. The land forms part of the South West Local Area Plan. More particularly the subject land is located immediately north of the Inner Relief Road, east of the railway line and west of the Mullagharlin Road. It also adjoins the ESB substation that serves the south west development area.

The subject lands form part of a medium to large sized farm holding, which is worked by the owner and is currently used for grazing and tillage. The lands that are the subject of this application are zoned for Mixed Use (EM) & Residential (RES 2) in the 2009-15 Dundalk and Environs Development Plan. The lands are also identified for development in both the South West Local Area Plan 2009 -15 for Dundalk and the Dundalk Gateway – New Development Plan 2009 -15. The proposals in the Draft Plan are to change the zoning of the lands to Strategic Reserve (L1), i.e. not to be developed until after 2017.

The rationale for this submission is that all the lands have already been identified as having development potential in a number of plans, are located adjacent to the lands in either industrial or residential use and fall within the serviceable envelope for Dundalk. The owner has received a number of approaches by third party developers to acquire part or all of his holding for both residential and employment based development. These are outlined later in this submission. The owner was of the view that the developer's proposals for his lands were substandard given the location of the lands adjacent to the Inner Relief Road on the gateway approach to Dundalk from the M1.

The subject lands can be serviced with potable water, surface water and foul drainage via facilities that exist in the area. There are no major road proposals affecting the holding, in that the road network in the vicinity is already fully developed. Clearly the holding also can be developed in its own right either as a standalone project, on a phased basis or as part of a wider area development for the South West Area.

This following submission details the case for **retaining the zoning of the land Mixed Use (C1) and New Residential (A2) in the proposed Louth County Development Plan 21-27** and more particularly in the Dundalk and Environs section of that Plan.

### **2.0 Location of the Lands**

The lands located on the southern outskirts of the town of Dundalk in Co. Louth in the townlands of Priorland, Crumlin & Fairhill. The lands lie within the jurisdiction of Louth County Council, but are located within the area covered by the Dundalk and Environs Development Plan. Pat Bishop owns all of the land that is the subject of this application. The land is located immediately north of the Inner Relief Road, east of the railway line, west of the Mullagharlin Road and adjacent to the ESB substation.

The land forms a medium to large sized farm but is located immediately adjacent to the well developed southern area of Dundalk. As pointed out above the lands are currently in use for grazing and tillage.

The land that is the subject of this application is located within the area that is shown on the zoning map for Dundalk and Environs (Map no. 1), but more particularly on the aerial photographic map (Map no. 2). These maps show the relationship of the lands to the existing road network, industrial, residential and other developments in the area.

### 3.0 Area

The site the subject of this zoning application comprises about 60 hectares

### 4.0 Current Zoning

The land falls within the development boundary for Dundalk and Environs and as such are zoned in the current zoning proposals for Dundalk under the 2009 to 2015 Dundalk and Environs Plan, which is part of the existing Louth County Development Plan. **In this plan the land is zoned for a combination of Mixed Use (EM) and Residential 2 (see map no. 1 showing part of the Dundalk & Environs Development Plan 2009-2015).** These zoning allow the following uses:-

- (1) **EM designation** – to provide for employment and supporting residential facilities
- (2) **R2 designation** – to provide for new residential communities subject to the availability of services

### 5.0 Zoning in Draft Plan

The lands are zoned as Strategic Reserve (L1) in the proposed development plan, which is basically to provide a land bank for the orderly development of the settlement in the future but would not be available for development until after the expiration of the proposed draft plan (after 2027)

### 6.0 Proposed Zoning

The land falls within the development boundary for Dundalk and Environs and in particular the South West Local Area, as such are included in the current zoning area for Dundalk. We are proposing that the existing land use zoning be retained, namely, **Mixed Use (C1) and New Residential (A2)**. You will note that the designations have changed,

i.e. EM to C1, but the descriptions of the land uses are the same. These zoning allow the following uses:-

- (1) *C1 designation* – to provide for employment, business and supporting residential facilities
- (2) *A2 designation* – to provide for new residential communities and supporting community facilities

In support of the above, we would point out that the lands:-

- (1) Can be serviced via facilities in the vicinity of the said lands, as such could be developed for employment/residential use in the short term
- (2) They abut lands that are in residential and employment uses
- (3) Have excellent road access
- (4) Other support services, such as electricity, telecom and broadband, are available in the area.

Clearly the lands are ideal for *immediate* development.

## 7.0 Site Description

The subject lands comprise 6 fields or “paddocks” in mixed use, located to the family dwelling and farmyard. The farming uses are approximately 50% grazing and 50% tillage.

## 8.0 Outside Factors

We would point out that the lands are located within an area that is essentially urbanized, as such there has been urban based nuisance experienced in the farming operation of the lands. This has been increasing gradually inline with the pace of urbanization. This is slowly impacting on the economic operation of the farming unit.

The locale and in particular the land close to the inner relief road is the subject of considerable development pressure. These lands have been identified as “Gateway” in previous plans for the south west area of Dundalk. Given their proximity to the Inner Relief Road and the M1 motorway, they are very attractive to developers. Indeed our client has had numerous approaches from developers to acquire parts of the holding, including from a high profile auctioneering firm in Dublin, a major gas distributor, as well as locally based auctioneering and architectural firms. He has resisted these approaches as their development proposals did not respect the high profile gateway location and would have impacted negatively on the development potential of the remainder of his land and indeed other holdings in the South West Local Area.

As a result, the owner has no option but to seek a zoning for the holding that reflects it’s potential for development in the short to medium term, namely mixed use and residential.

## **9.0 Services**

### **A) Water Supply: -**

The lands can be serviced with a potable water supply by way of a connection from the existing water supply that runs along the old Mullagharlin, Priorland and Inner Relief Roads. The pipe sizes of the distribution network in the locality are more than adequate to serve any development on the lands.

We would indicate that the source of the supply for Dundalk and Environs is Lough Muckno in Co. Monaghan and after treatment it is pumped to a high level reservoir at Cavan Hill, which serves the subject area. Louth County Council has indicated that it intends to invest in improvements to the water supply in the Dundalk Region, the cost of which will be borne by way of a levy on proposed developments. My client would be quite willing to make a reasonable contribution towards these improvements if he was allowed to develop his lands.

It would be proposed to provide a main service main together with suitable ringmains to serve the area for development with a separate supply to serve each development block with separate supplies to each dwelling or building proposed as part of any planned development on the said land. This supply system will have the various water supply fittings such as valves; hydrants etc. fitted at the most appropriate locations. The construction details for the supply will form part of the planning process and if necessary agreed with the local authority.

### **B) Surface Water Drainage; -**

Surface water from the site can be drained directly to a large surface water drain running close to the railway; this drain runs through the holding. This system discharges into Barmer's Bog area, which is located to the north of the holding. This drain is adequate in size to cater for any development on the subject lands. It would be proposed that this drain would be piped in due course in line with the pace of development; again details will be agreed with the local authority.

Attenuation on-site will be provided on site in line with the required standards.

The applicant has direct access to this existing surface water drain and will not require wayleave facilities over any lands in other ownership.

### **C) Sewerage; -**

There are foul sewerage mains serving other developments in the immediate vicinity of the land holding, but do not serve the subject lands at the moment, e.g. Mullagharlin Road and just south of the roundabout on the Inner Relief Road. Preliminary assessment suggests that the sizing and levels of the existing mains and pumping station are adequate

to serve part of the subject lands. Indeed all of the lands could be served by pumping. Clearly this will have to be checked as part of the detailed design for any residential scheme on the subject lands.

The sewer connection from the subject lands to the existing mains and pumping station in the vicinity will not require a wayleave. As indicated it will be necessary to carry out a detailed topographic survey of the subject lands and adjoining area in order to design the optimum foul drainage system to serve the proposed development layout on the subject lands. It is likely that in the long-term a new South West Area interceptor sewer will be provided to serve the totality of the South West Local Area, probably running along the line of the existing surface water drain. Any interim sewer network can be designed to serve the immediate requirements as well as to connect into this future sewer.

The extent that development of the subject lands can take place will in the short term be limited by the available capacity available for treatment Dundalk Treatment system. This should not be a limiting factor as far as rezoning is concerned given the authorities proposals to improve the drainage facilities in the area in line with the growth of Dundalk. Further, any planning application made by the applicant in the future will require that:

- (1) The issues in respect of drainage to both the stadium and town network will have to be addressed to the satisfaction of the local authority.
- (2) Capacity is available in the both the collection system and sewerage works to treat the effluent generated by the development.

**D) Roads: -**

The land has direct road access onto a number of roads including the Inner Relief Road where a road connection has been provided onto an existing roundabout. As such the lands have has sufficient road frontage available for the provision of an entrance or entrances to serve any proposed development. It should be noted that any development proposal will have a link to any proposed new local distributor road for the south west area; this link road will connect the area to the existing roundabout on the Inner Relief Road. Access points to the distributor will be limited and this distributor will be designed so that it can service the totality of the south west area.

All in all sufficient road frontage is available to the applicant to provide access or accesses to serve the lands. These junction/junctions and the associated local network will be designed so as to comply with the requirements of Louth County Council in respect of serving the South West Area as a whole. Further the road design will comply with the NRA published DMURS or the design standard prevailing at the time.

We would indicate that Inner Relief Road Roundabout Access fully complied with the requirements of the local authority pertaining at the time of its construction. Indeed the

roundabout would comply with current standards. This road infrastructure will provide the means of access/egress from the South West Local Area.

We would indicate that the lands are not impacted upon in any way by future major road improvement proposals.

#### **E) Other Services**

Broadband, telecom and electricity supplies are readily available in the area and can be incorporated into the design of the service layout of any development, be it a one-off or multi.

#### **10.0 The Case for Rezoning**

The site represents a natural area to zone for mixed use/residential use, in that:-

- (1) The lands can be serviced via facilities in the vicinity of the said lands, as such could be developed for employment/residential use in the short term
- (2) The lands abut lands that are in residential and employment uses
- (3) Have excellent road access
- (4) Other support services, such as electricity, telecom and broadband, are available in the area.

The overall development plan for the Louth includes for the development of major development centres like Dundalk and its environs, where services can be provided at reasonable cost. The town has the full range of services in existence including community facilities including church, schools, community centres, local shops, restaurant, public houses, sporting facilities including golf, GAA, racing, soccer etc. to service the South West Local Area. Indeed, these services are available within easy reach of the lands.

The South West Area including the subject lands are located within the zone of influence of Dundalk town, where there is an increasing demand for employment and housing units to be provided to service the existing shortfall in the area. Indeed, the Louth area including all the main towns would be considered to be prime development areas for the Greater Dublin Area, given the excellent transport links (rail and M1 motorway).

The M1 (National Primary Road) between Dublin and Belfast has been upgraded to full motorway standard, this major road link in the North East Region has increased, and after Brexit will further increase, the demand on the town for additional industrial and housing land over and above that arising from its own natural growth. We also understand continued improvements are planned for the rail link between Dundalk and Dublin, particularly in respect of the commuter aspect, again this development like the road will increase the attractiveness of the area as a whole, as such we would content that the local authority should be making land available and zoning land for development, particularly serviceable land.

## **11.0 Conclusion**

As we have indicated above, the subject land can be developed on its own for industrial/residential development without impacting on the similar zoned land in the Dundalk area. The land abuts land in residential/industrial use and can be serviced at present by the applicant without the requirement for wayleaves etc.

**To conclude, having taken the above into consideration and in particular the “Gateway” location, we believe that there is a strong case for zoning the land the subject of this submission Mixed Use (C1) and New Residential (R2). We trust that the planning authority will agree and retain the lands in their current zoning designations.**

**Frank Burke  
Chartered Engineer  
Dated: - 3-12-2020**

**Encl.: -**

- (1) Existing & Proposed Zoning Map**
- (2) Aerial Photographic Map of the Subject Land – Showing development in the area**

**C.c. Pat Bishop, Priorland Villa, Mullagharlin Road, Dundalk.**

MAP NO 2 - PATRICK BISHOP

LAND PROPOSED FOR...

MIXED USE (C1)



RESIDENTIAL (R2)



Carnabreagh

M1

M1

Haynestown  
Bridge

Dundalk Institute  
of Technology

MUIRHEVNAMORE

30



MAP NO 1

DUNDALK & ENVIRONS 2009-15

PROPOSED ZONING



EMPLOYMENT MIXED USE (EM)



RESIDENTIAL 2 (RES2)

BOUNDARY of  
HOLDING (PART)  
PROPOSED  
FOR  
ZONING

BOUNDARY of  
HOLDING (PART)  
PROPOSED  
FOR ZONING

