

Forward Planning Unit.
Development Plan Review.
Louth County Council,
Town Hall,
Crowe Street,
Dundalk A91W20C
Co. Louth.

15th December 2020

Dear Sir/Madam,

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

**RE: SUBMISSION TO DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021 – 2027 ON
BEHALF OF DUNDALK GRAMMAR SCHOOL, LANDS AT CARRICKMACROSS ROAD
(R178), DUNDALK, COUNTY LOUTH**

Dundalk Grammar School (DGS) CLG of The Crescent, Dundalk, County Louth has retained Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House, Jocelyn Street, Dundalk, County Louth to make this submission relating to its lands on the south side of the Carrickmacross Road and immediately west of Oriel Park, Dundalk, County Louth.

Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth.

To assist Louth County Council in complying with the provisions of the Data Protection Act full details of our submission on behalf of Dundalk Grammar School are attached.



Jocelyn House
Jocelyn Street
Dundalk A91 03Y
Co. Louth
Ireland

Tel.: +353 (42) 9329791
Fax.: +353 (42) 9329047
e-mail: planning@wardconsult.com
web: www.wardconsult.com



Registered in Ireland No. 275223
VAT No. 8275223D

1.0 INTRODUCTION

1.1 The submission lands extend to 6.23 hectares and are identified edged red on the site location map below. The lands are immediately west of Oriel Park and are accessed directly off the Carrickmacross Road, well within the 50 kph speed limit zone. The lands are also well within the built footprint of the town of Dundalk. They are very well related to community and public transport infrastructure being located only xxx metres from Dundalk railway station and xxx metres from the centre of the town.

1.2 The submission lands are capable of being serviced and drained and safe access and all utility services can be provided.

1.3 Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth.

This submission seeks the rezoning of the lands edged red on the Site Location Map below from G1 – Community Facilities and H1 Open Space to A2 New Residential in the Development Plan.

2.0 PLANNING CONTEXT

2.1 The subject lands have been in the ownership of Dundalk Grammar School CLG for many years. They are leased on a short-term ad hoc basis for sporting activities. Recently the Grammar School purchased an extensive land area south of the existing school grounds, west of Hill Street Bridge and the Dublin Road and including part of Balmer’s Bog. This area, referred to as the “Hill Street” land extends to 4.17 hectares. The geographical relationship between the ‘Carrick Road’ lands and the ‘Hill Street’ lands are illustrated on the attached site context map.

2.2 The School is presently preparing a masterplan for the Hill Street lands for the purposes of developing a sports and recreational facility of regional significance and including a low-impact ecological park stretching into the Balmer’s Bog area. It is intended that this area would be used by the school but would also be available for public use. A separate submission is being made to the Development Plan seeking the attachment of a Spot Objective to the “Hill Street” lands for the objective for the provision of a sports and recreational facility on the lands. In addition, whilst the DGS does not object to the C1- Mixed Use zoning for the Hill Street lands it seeks an amendment to the permitted uses under C1 zoning objective to include the use category ‘Sports Recreation/Sports facility’ as a permissible use.

2.3 DGS is making a separate submission seeking the application of a Spot Objective to the Hill Street lands for the development of a sports / recreation facility and low impact ecological park on lands west of Hill Street and south of the existing Dundalk Grammar School. That submission also seeks the addition of “sports/recreation” use as a “Generally Permitted Uses” under the C1 – Mixed Use zoning objective.

2.4 Given the proposals of the school to develop a sports/recreation facility at Hill Street, the school lands at Carrick Road are now not required for sports / community uses. In addition, the rezoning of the Carrick Road lands for A2 residential uses would facilitate the funding of the sports/recreation facility at Hill Street.

2.5 The Hill Street lands are ideally located for the proposed sports/recreational facility as these lands immediately abut and are to the south of the existing school. As such they are the best available lands to allow the school campus to expand. This would be a very good thing for Dundalk. Also the sports/recreational facilities would be available to the public. The Hill Street proposal would also include a low impact ecological park in the Balmer's Bog area helping achieve another good use for lands. In all, the proposal would result in high quality active sports and recreation facilities coupled with low impact ecological park at the heart of the town.

2.6 The release of the Carrick Road lands for residential development to facilitate the development of a sports/recreation facility for the school at Hill Street would also contribute to the Grammar School maintaining its very important role as an educational institution for Dundalk and the surrounding region.

2.7 Turning to the Carrick Road lands it is evident that the pattern of surrounding development and planning permissions make the submission lands entirely suited for residential development within the period of the new Development Plan.



Figure 1 - Site Location Map

3.0 APPLICATION OF 'TRAFFIC LIGHT' LAND ALLOCATION SYSTEM TO THE SUBMISSION LANDS

3.1 The County Core Strategy promotes a "Traffic Light" system to identify the suitability of sites for new development. A site with a lower score is more preferable to a site with a higher score. The sites assessed at Dundalk are set out at pages 12 and 18 of Appendix 2 (Land Evaluation and Infrastructure Assessment) to the Draft Plan. Given the lands have a community and open space zonings it appears they were not assessed in terms of their suitability or otherwise for residential development. It is contended that if the lands were assessed under that system they would, without doubt, have received a very good (low) score. It is submitted the allocated score would not have been reduced due to the existing zonings on the lands. This is because of the proposals to develop the School's Hill Street lands. In other words, given the parallel proposal for recreation/sports use at Hill Street, the development of the Carrick Road lands for residential development would not result in any net loss of community / open space lands in the area.

3.2 The Carrick Road submission lands are very well related to the built-up area of Dundalk being in direct proximity to Dundalk Railway station and the town centre as well as surrounding educational and community facilities that include the Grammar School itself.

3.3 The application of the Traffic Light land allocation system to the submission lands would result in a very good score in relation to all of the assessment criteria in that system. It would receive a very good score in terms of Infrastructure Availability given water and wastewater facilities can be made available to the lands and they connect directly to public roads and footpaths that have public lighting. In other words, they make use of existing facilities that are already available in the area and this represents a sustainable development proposal. In terms of the Land Use Evaluation contained in the Draft Plan for assessment of site suitability, the lands would also score very well against all the assessment criteria. The lands are clearly in "Proximity to Town Centre"; They would undoubtedly facilitate "Consolidate /compact Growth"; they are in direct "Proximity to Shops and Services", and in "Proximity to Schools"; the development of the lands for residential purposes would represent comprehensive "Infill/Backland" development; being so close to Dundalk Railway Station the lands would score very well in terms of "Availability of Public Transport" and the lands would score well in terms of flood risk assessment.

4.0 AVAILABILITY OF COMMUNITY FACILITIES IN PROXIMITY TO THE SUBMISSION LANDS

4.1 Section 4.6 of the Draft Plan states as follows – *"Planning applications on zoned lands for residential development on sites of 1ha or greater, or for 100 residential units or more, shall be accompanied by a Social Infrastructure Assessment, to determine if facilities in the area are sufficient to provide for the needs of all future residents. Where deficiencies are identified, the assessment should demonstrate how these will be addressed, either through direct provision on site, or such other means and in a manner, which is deemed acceptable to the Council"*.

4.2 The rezoning of the submission lands for residential would also assist in the viability of the recreation/sports facility proposals at Hill Street and so would comply with Draft Plan Policy SC8 that states –

“To support the planning provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities have access to a range of facilities that meet the needs of the communities they serve, are physically integrated with residential and employment areas and are provided concurrently with new residential development”.

4.3 The area within which the submission lands are located is well served by neighbourhood uses and is within a comfortable 15 minute walk of the centre of Dundalk. As illustrated on the Community Services Map contained within 15 minutes of the site are shops and other commercial uses, a crèche, community and educational uses, pubs/restaurants as well as sports, recreation and other leisure facilities. Given the proximity of the site to the centre of Dundalk, it is not surprising that there is no short-fall in community/commercial/leisure/recreation facilities immediately surrounding the lands.

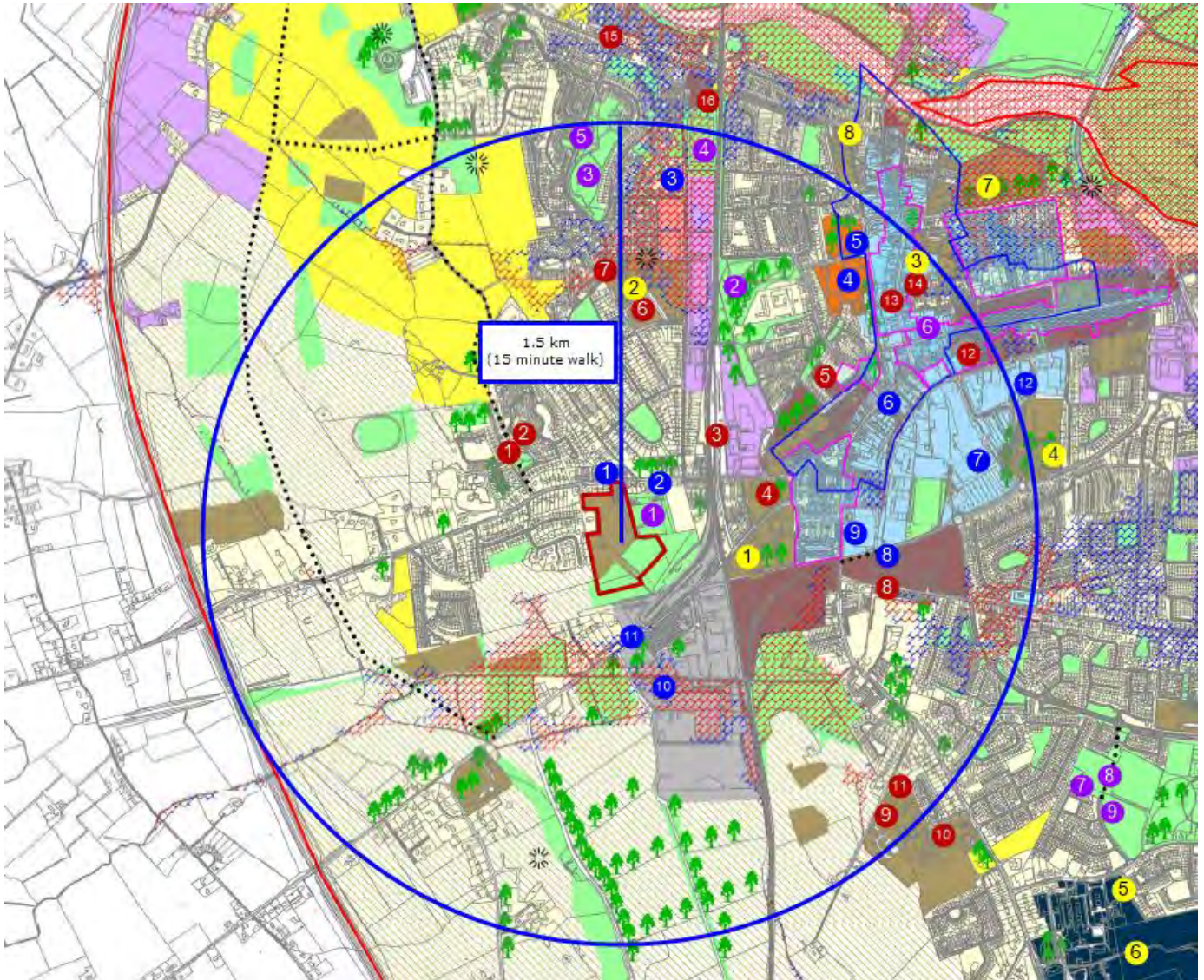


Figure 2 - Community Audit Map

Site Boundary

Sports / Recreation		
1		Oriel Park
2		Hiking
3		Hiking
4		GAA Club
5		Boxing Club
6		Arts Centre
7		Football Club
8		GAA Club
9		Pitch & Putt

Retail		
1		Shop
2		Shop
3		Dunnes
4		Shopping Centre
5		Cinema
6		Bar / Restaurant
7		Shopping Centre
8		Lidl
9		Tesco Extra
10		Café
11		Filling Station
12		Aldi

Community Services	
1	Medical Centre
2	Pharmacy
3	Train Station
4	Garda Station
5	An Post Sorting Office
6	Church
7	Family Resource Centre
8	Dental Surgery
9	Hospital
10	Hospital
11	Church
12	Church
13	An Post
14	Credit Union
15	Shop
16	Veterinary Clinic

Schools	
1	Dundalk Grammar School
2	St Brigid's Special Needs School
3	Coláiste Rís
4	Coláiste Chú Chulainn
5	PLC
6	DKIT
7	St Mary's College
8	Castletown Girls School

5.0 THE DRAFT PLAN AND OUTDOOR RECREATION

5.1 Section 4.7 of Chapter 4 of the Draft Plan sets out policies and objectives for outdoor recreation over the period of the Plan from 2021 – 2017. The introduction to this section of the Plan notes *“Outdoor recreational spaces and facilities are essential for the health and wellbeing of people living in County Louth”*. As noted the rezoning of the submission lands for residential development would be a key component in facilitating the financial viability of the Hill Street Sports/recreation facility and in that light the proposed rezoning would not result in any net loss of existing playing pitches, fields and other recreational spaces. In fact the development of the Hill Street lands in the manner proposed would result in a significant net increase in the availability of sports/recreation and passive leisure facilities for Dundalk and the wider region.

5.2 It is noted in particular that the proposed rezoning because it is linked to the Hill Street development would not conflict with draft policy SC14. This is the case not only because the submission lands are not existing public open space but notwithstanding this that the rezoning would significantly improve the viability of a project that would without doubt represent a major and significant contribution of active and passive open space for Dundalk. Policy SC14 of the Draft Plan states - *“SC14 – To resist the loss of existing public open space, unless satisfactory alternatives in suitable locations are available”*.

5.3 Sections 4.7.1 (Open Space and Parks), 4.7.2 (Play facilities for Children) and 4.7.3 (Sports Facilities) all promote such facilities and the rezoning of the submission lands would facilitate their provision as part of the Hill Street sports/recreation/leisure development by Dundalk Grammar School. For example, Draft Policy SC16 states – *“To support the provision of playgrounds in a variety of land use zoning categories where appropriate”*, Policy CS18 states – *“To maximise the range of public play opportunities available to all children”* whilst Policy Objective SC20 states with respect to sports facilities – *“To support and facilitate the provision, improvement and expansion of sports and recreational facilities, in particular through land use zoning, where appropriate”*.

6.0 THE DRAFT PLAN AND EDUCATION

6.1 Draft Plan policy for education is set out at Section 4.10 of the Development Plan. The rezoning proposed in this submission is directly linked to the continued success and future expansion and growth of Dundalk Grammar School. The school is an important educational component in the educational structure of Dundalk. The School must always look forward to grow and expand the range of facilities available to pupils. It is in that light that the school has acquired lands to the south of its existing campus. It is intended to develop these lands as a major educational and recreational sports complex for the school that will also be available to the public. In addition to the sports / recreational complex it is also intended to develop a low-impact ecological park at Balmer’s Bog. These facilities are expensive to develop and it is for this reason that the School makes this submission for the rezoning of surplus lands in the ownership of the school at its Carrickmacross Road lands.

6.2 The rezoning of the submission lands for the purposes sought would, therefore comply with the introductory statement to Section 4.10 of the Plan that states – *“Education is a critical drive of economic success and social progress. The provision of quality education and training is central to skills, knowledge and innovation based economy that will underpin future prosperity”*. The rezoning would also comply with the draft policies set out below because the rezoning of the submission lands would provide a path and finance to facilitate the development of a significant recreational complex for sports and leisure uses for Dundalk Grammar School and to which the public would have access. The sports / recreation / leisure campus would also maintain the key position of the school into the future as a major educational provider for Dundalk and the north-east region –

“SC25 – To ensure that adequate lands are zoned and reserved to cater for the establishment, improvement and expansion of all educational facilities in the County”.

“SC26 – To reserve sites for educational use in those areas identified for significant population increase or where there is likely demographic demand for further school places and to ensure the development of educational facilities to meet the educational requirements of citizens of County Louth”.

7.0 HOUSING STRATEGY DOES NOT CONSIDER ANY BREXIT IMPLICATIONS FOR HOUSING DEMAND IN DUNDALK AREA

7.1 Whilst it is clearly contended that the submission lands are suited for a residential zoning objective irrespective of housing land requirements because of considerations such as their geographical location towards the centre of the town, proximity to public transport and contribution they would make to consolidated/compact growth we would also highlight that the Draft Plan underestimates the requirement for residentially zoned lands for the period of the Development Plan. This, it is submitted adds further weight to the case for the zoning of the submission lands for residential development. Some examples of why additional land are required for residential development zoning are set out in this section of our submission. Taken together, and including the contribution the rezoning would make towards the provision of a major sports / recreation facility in the centre of Dundalk (at Hill Street) it is submitted there is an overwhelming case in the interests of the proper planning and sustainable development of the area for the rezoning of the lands.

7.2 The Draft Plan and its supporting documents make little reference to the impacts of Brexit especially and whether that event will have an impact for housing development in the Dundalk area. It is widely reported that there is keen interest from firms wishing to set up business in the Dundalk area in response to Brexit and this will undoubtedly impact on demand for housing in the area. The Housing Strategy for the Development Plan (Appendix 3 to the Draft Plan) makes no mention of any potential Brexit impact on the housing market in the area. This, we submit, contributes towards an under-provision in housing requirements and land zoned for residential development over the Plan period. Furthermore, the shortage of housing to accommodate employees wanting to work in Dundalk is a recurring theme from key employers in the area, including Paypal and National Penn. This shortage will only be accentuated by new companies opening in Dundalk including the WuXi Biologics plant but also other firms seeking to locate in the area as a result of Brexit.

7.3 Given Brexit has not been considered in assessing the Housing Strategy it is strongly contend that the Draft Plan significantly underprovides for residentially zoned lands over the period of this Development Plan.

7.4 In addition to the absence of any Brexit assessment, it should be pointed out there is in the business world a well-recognised shortfall in housing in the Dundalk area to provide housing for existing and new employees in the area. This matter is regularly raised by existing employers and is having a negative impact on the ability of employers, existing and new, to recruit new employees. This situation will be accentuated with WuXi coming on stream and with new firms locating to the area as a result of Brexit and yet this Draft Plan does not factor this or the Brexit considerations. Such an approach severely undermines the ability of Dundalk to growth to a population of at least 50,000 as per the Regional Spatial and Economic Strategy (RSES).

7.5 It should also be pointed out that in zoning lands at Drogheda, including lands that the Plan explicitly acknowledges will be developed over several Plan periods, the Drogheda Plan still zones all of these lands for A2 – New Residential in this Plan period.

8.0 THE ROLE AND PURPOSE OF POPULATION TARGETS

8.1 The importance of understanding the purpose of population projections cannot be over-estimated. Population targets should not be seen as caps or ceilings not to be exceeded. This is especially so at growth centres such as Dundalk. The function of population targets is put succinctly by the Director of the Eastern and Midland Regional Assembly in his response to submissions on the Draft RSES where he states at Page 36 of his Report –

In relation to the population projection for Drogheda being too low, it is considered that the population target of 50,000 would enable a city scale population to be achieved in Drogheda and this is considered an appropriate target to aim for. It is important to note that this should not be viewed as a constraint on the growth of the town, rather that it is expected to reach this target and if it is exceeded by 2031, that it will be considered successful. Having regard to the calls for city status to be assigned to Drogheda, it is considered that the designation of city status to a settlement is not a function within the remit of the RSES, it is acknowledged that a population of at least 50,000 is considered to be a city scale and that is the target set in the RSES. However the RSES focuses on growth in the right locations and establishing the drivers for the settlement to sustainably grow as a strong Regional Growth Centre that is a priority focus for the region.

8.2 What is clear from the Report of the Director is that whilst referring to Drogheda his statement is very clear that a target population is something that should be aimed for and if it is exceeded then that is a good thing and something to be celebrated and encouraged. As the Director states, exceeding a population target “will be considered successful”. There is no justification to suggest the lands should not be zoned for residential development because they might result in a notional population target being exceeded. Such an approach is the exact opposite of what the Director of the Eastern and Midland Regional Assembly categorically and clearly states as the function of population targets.

9.0 POPULATION PROJECTIONS MUST BE TREATED WITH GREAT CAUTION

9.1 We suggest in this submission that a far higher degree of flexibility is needed in terms of housing land requirements for the Dundalk area over the period of the Development Plan and that over-reliance on population projections to apply a housing land allocation is not appropriate. It is acknowledged that population projections are important but they are only one element in a very complex set of baseline inputs.

9.2 As an example of how population projections can quickly become outdated and less than reliable in terms of assessing housing land requirements, is the ESRI Report 'Regional Demographics and Structural Housing Demand at a County Level (ESRI December 2020). This Report forecasts that housing demand will require at least 33,000 dwellings per annum whereas the National Planning Framework is based on a requirement of 25,000 homes per annum. Furthermore, the ESRI Report forecasts that Louth will receive a high level of international net migration. In addition, the ESRI states that in making assessments of housing needed to meet demand an obsolescence rate needed to be applied and this is not done in the Draft Louth Housing Strategy. It is also noted that 2021 is expected to be a Census year.

9.3 The December 2020 ESRI Report suggests that the previous projections for annual housing requirements are at least 8,000 below what is now expected. The obvious outturn from these most recent projections is a lot more land needs to be zoned for residential development than was previously anticipated. Overall, latest ESRI projections are that the annual national requirement for housing will be at least 8,000 units or over 30 per cent more per annum more than the NPF projections.

10.0 LACK OF NATIONAL GUIDANCE FOR DEVELOPMENT PLAN PREPARATION

10.1 It is submitted that in the absence of national guidance on preparing development plans and on the preparation of housing strategies and Housing Needs Demand Assessments that a very high degree of flexibility needs to be contained in terms of housing provision for towns and villages and especially for a Regional Growth Centre such as Dundalk. It is neither advisable nor appropriate for population or housing provision over the Plan period to be set out at caps or thresholds not to be exceeded. These are targets which the Council should aim to achieve as minimums and should embrace and celebrate when targets are met and exceeded. Otherwise County Louth runs the risk of underperforming in terms of achieving its population and housing targets and this would be an opportunity lost for a designated Regional Growth Centre such as Dundalk.

10.2 The question might be posed – What alternatives will there be for a flexible and rapid response in the event that new national policy emerges that encourages population targets to be reached in Regional Growth Centres after the Draft Louth Plan is adopted with its extremely restrictive policy and zoning approach to population growth and residential development. The only resolution would be to consider planning applications by way of material contravention or a review of the Development Plan that would take a considerable time to complete.

10.3 The submission lands represent an ideal opportunity to introduce much needed flexibility in the available sources and sites from which residential development can be provided. As noted the lands are close to the centre of the town and are very well related to such land use evaluation markers such as contributing to compact and consolidated growth and proximity to public transport and schools.

11.0 THE DRAFT COUNTY PLAN AND POPULATION GROWTH

11.1 It would seem from an analysis of Chapter 2 – Core and Settlement Strategy and Table 2.9 of that Chapter of the Draft Plan that the rate of population growth envisaged for the County over the period of the Development Plan will be less than that in preceding years. According to the Table the population of the County increased by 27,063 over the period 2002 – 2016 but is only expected to increase by 21,082 over the period 2016 – 2027. Whilst these are obviously different time periods, they nonetheless confirm the Draft Plan proposes only marginal increases in the population of Dundalk.

11.2 At the County level Column G to Table 2.9 of the Draft County Plan states that the average annual population increase in the County over the period 2002 – 2016 was 1,933. Column H to the Table states the projected annual average population increase over the period 2016 -2027 will be 1,916. Comparisons between these columns should be treated with caution as they compare averages over different time periods. Nevertheless, overall, the Draft Development Plan envisages a reduction in the rate of population growth in the County. Comparing columns E and F would suggest that the Plan envisages a reduction in the rate of population increase over the period of this Draft Plan when compared to the rate of population growth over the period 2002 – 2016.

11.3 A similar situation arises with respect to Dundalk with the population increase over the period 2016 to 2027 only marginally higher when compared to the period 2002 – 2016 and this despite the designation of Dundalk as a Regional Growth Centre. For example, over the period 2016 – 2027 Dundalk is expected to increase its population by 7,660, compared to an increase of 6,499 over the period 2002 – 2016.

11.4 It is submitted the population and housing allocations for Dundalk in the Draft Plan show a real lack of ambition to drive the County and the two main settlements to full regional growth centres at a far quicker pace. The proposed increase in the rate of population growth at Dundalk is at best marginal.

11.5 These marginal population growth rates conflict with the stated objectives for the Regional Growth Centres as set out in the Core and Settlement chapter (Chapter 2 of the Draft Plan). With respect to Regional Growth Centres (RGCs) Page 2-8 of the Plan states –

“Regional Growth Centres (RGCs) support the direction of significant population and economic growth to ensure these centres reach sufficient scale, to serve as economic drivers for the Region and implement effective regional development. Drogheda and Dundalk are designated as Regional Growth Centres”.

11.6 Similarly Table 2.4 sets the RGCs at the top of the settlement hierarchy and describes their role as –

“Regional Growth Centres are 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”.

11.7 Policy SC26 is also relevant in that the rezoning of these lands would facilitate the development of educational and sports/leisure/recreation facilities to meet demographic demand and ensure the development of educational facilities at Dundalk Grammar School meet the educational requirements of the citizens of the County.

11.8 It is important to note that the RGCs should grow at an accelerating rate to reach sufficient scale in themselves but also to act as drivers of economic growth in the wider areas sustaining growth in the smaller settlements and rural areas in that region. Thus if the growth centres are not performing the surrounding towns, villages and rural areas will suffer decline.

12.0 THE CORE STRATEGY AND HOUSING LAND ALLOCATION

12.1 County-Wide Land Requirements – It is submitted, and as noted above, there is a huge chasm in the baseline information available to the Planning Authority to make population, household and ultimately residential zoning allocations particularly in terms of the quantity of land that is required to meet housing requirements over the period of the new County Development Plan. There is no strong evidence base to support either the assumptions regarding the contribution from infill sites or the yield from these sites. In any event, it is strongly contended that infill and brownfield sites should be considered “windfall” sites and development on these sites should not be counted towards meeting housing requirements. The principle of development on these sites only produces positive outcomes in terms of sustainable urban development and as such should be encouraged at all times regardless of how many dwellings are provided from this source or what the outturn is for housing or population numbers. The approach in the Draft Plan to the contribution from infill/brownfield sites is not an evidence-based approach. For example, it is not evident what sites were assessed and for that matter the level of detail at which these assessments were undertaken at and even the density assumptions applied are not provided. A key consideration missing from the assessment is whether the identified sites are available for development and also whether they are in single or multiple ownership. Often infill sites are in multiple ownership and may not become available at all because of this or at the very least can take a considerable period of time to be assembled such that a planning application can be made. Reliance on infill/brownfield sites to contribute to housing supply is not advisable.

12.2 In the absence of national guidance on such fundamental elements that form the basis of land allocations i.e. Housing Strategies, Housing Needs Demand Assessments and Guidelines on the preparation of Development Plans, it is respectfully suggested that the submission lands represent a windfall or opportunity site and should be zoned for residential development. To do otherwise with such sites would be to inhibit Dundalk achieving its status as a Regional Growth Centre with a population of at least 50,000 and for no good sustainable planning reason.

12.3 It is submitted that Table 2.4 of the Core Strategy that sets out housing land requirements over the period of the Development Plan is far from clear in terms of how the amount of land required to be zoned is arrived at (Column L - Total Lands Zoned for New Residential Uses (ha). Similarly, how the figures within Columns J and K (Brownfield lands) were arrived at is not clear. It is also submitted that the contents of the Housing Allocations at Column I underestimate the required housing allocation of 8,278 over the Development Plan period. Column I is taken from Table 4.1 of the Draft Housing Strategy and it is apparent that Table 4.1 of the Housing Strategy calculates the requirement over a 7 year period as opposed to the 6 year period of the Plan. Table 4.3 of the Housing Strategy estimates an annual requirement of 1,098 whereas it is evident from Table 2.14 of the Draft Plan that the actual Draft Plan itself estimates an annual requirement of 1,380 dwellings per annum. These Housing Allocations derive from the Draft County Housing Strategy and the Housing Needs Demand Assessment at Appendix 3 to the Draft Plan. It would seem that Column H (Approximate Units Completed 2016 – 2020) includes ‘one-off’ houses. Such housing provision should not be included as part of the required allocation over the period of the Development Plan.

12.4 As stated above there is a real dearth of national guidance on how to approach a Housing Strategy, a Housing Needs Demand Assessment and on Guidelines for the preparation of Development Plans. The result is that methodologies and outcomes within different parts of the Plan appear conflicting. If adopted as proposed this would likely result in a Development Plan that inhibits and undermines the overarching goal for Dundalk to reach a population of at least 50,000 by 2031. For this reason it is respectfully suggested a far higher level of flexibility to take account of lands that do not come forward for development so that alternatives are available. The rate of growth can then be assessed by way of a much more sophisticated ‘plan-monitor-manage’ approach. The submission lands represent an ideal candidate to act as a release valve for development lands in the event other lands do not come forward.

12.5 An inadequate supply of housing land especially when the availability of the proposed land sources has not been assessed as part of the analysis is not a helpful approach when the aim is for Dundalk to grow to Regional Growth Centre status. If lands zoned A2 do not come forward in sufficient quantities and additional lands are required the Planning Authority would have to vary the Development Plan or adopt a material contravention approach. Both these approaches are wieldy and cumbersome and don’t lend themselves to rapid adjustment to housing supply sources or to the ability of the Planning Authority to react quickly to ensure that much needed momentum is developed to grow Dundalk to Regional Growth Centre status.

12.6 previously noted the residential land zoning requirements needs to be reassessed following the publication of detailed national Guidance notes and at least until those are available, the De-zone strategy as expressed through the L1 – Strategic Reserve zoning should not be adopted, existing residential zonings should be reinstated and a “plan – monitor – manage” system for residential development should instead be adopted. This level of flexibility is required at least until national policy becomes available.

13.0 OVERVIEW OF THE ‘TRAFFIC LIGHT’ LAND ALLOCATION SYSTEM

13.1 As noted previously in this submission the Traffic Light assessment system applied to the Tiered Assessment Analysis is far too rudimentary and simplistic to allow objective assessment but a site such as that proposed would, it is submitted achieve an excellent score in any land available methodology that might be applied. Indeed, the submission lands might well be viewed as an example of the pitfalls and shortcomings of the methodology adopted in the Draft Plan. It should be emphasised that this is not a criticism of the drafting of the Plan but an indication of trying to apply a methodology that was not derived from national guidance and the weight and resources that can be applied to the preparation of such an important document at national level. This again is not due to the approach of the Planning Authority as the Authority is operating in a policy vacuum but due to the lack of national guidance on a structured and national approach. In that light there are many flaws in the Traffic Light Land Allocation Assessment for Dundalk and many of these have already been highlighted in terms of their application to the submission lands. A full assessment would have considered the submission lands, including contact and detailed interaction with the existing landowner which is Dundalk Grammar School.

13.2 The main concern is that the outcome is to a large degree pre-determined by the system adopted and unsuited to application at a large town designated as a growth centre. In particular, and as noted no assessment is provided with regard to the availability of sites that are assessed. It is not clear if land agents or landowners were contacted and the degree of interaction that ensued. Such engagement is a fundamental input into a robust land allocation system. There is little point in allocating land for residential development if that land is unlikely to come forward for development. Equally, without interaction with land owners a full assessment of what other lands might be available is also not complete.

14.0 SUMMARY AND CONCLUSION

14.1 It is contended that the submission lands would receive a very good score in terms of suitability to be zoned for residential development if assessed under the Tiered Site Assessment (Traffic Light System) used in the preparation of the Draft Development Plan. Whilst of themselves very well suited for a residential zoning, it is submitted the rezoning of the lands as sought when coupled with the proposals of the Dundalk Grammar School to develop a state-of-the-art sports/recreation facility on lands the school has recently acquired to the south of its existing school grounds further adds to the case for the rezoning of the submission lands. The proposals of the School for the lands to the south of the existing school and west of Hill Street will incorporate playing pitches and facilities for athletics and a range of different sports. In addition the proposals will provide for a low impact ecological park for educational and leisure purposes at Balmer's Bog. It is intended that public access will be made available to the sports/recreation facility and the proposed ecological park at Balmer's Bog.

14.2 Notwithstanding that the submission lands are not public open space and are used primarily by the school with ad hoc use by other sports organisations, taking account of the above proposal to develop a new state-of-the-art sports/recreation and ecological park in close proximity, the proposal would not result in any net loss of open space and if anything would result in a major new addition to sports/recreation/leisure facilities at the heart of Dundalk town. The rezoning of the submission lands would facilitate the proposed sports/recreation/leisure development to which access by the public would be available.

14.3 The proposed rezoning would also act as a catalyst for the sports/recreation/facility which would copper-fasten Dundalk Grammar School as a key educational provider in Dundalk and the wider region which would be fully in keeping with the community and education policies and objectives as set out at Chapter 4 of the Draft Development Plan.