

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 BIRCH’S LANE DEVELOPMENTS LIMITED – LANDS AT BIRCH’S LANE,
BLACKROCK, DUNDALK, COUNTY LOUTH**

Birch’s Lane Developments Limited of Lisgrew, Emyvale, Monaghan 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 at Birch’s Lane, Blackrock, 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 Birch’s Lane Developments Limited are attached.



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1.0 INTRODUCTION

1.1 The submission relates to lands at Birch's Lane, Blackrock, Dundalk, County Louth. The lands are identified edged red on the site location map below. The lands are broadly rectangular in shape and are bounded to the east by the rear of properties fronting the Blackrock Road (R172) and by the rear of properties in a development known as 'Village Green'. The southern boundary is defined by the rear of properties fronting Birch's Lane and by Birch's Lane itself. The western boundary abuts Dundalk Golf Club whilst the northern boundary abuts a recently permitted Strategic Housing Development (SHD) permission granted under An Bord Pleanála Ref. ABP-304782-19. There is also a large multi-unit residential development to the south of Birch's Lane.

1.2 This submission is supported by an overview engineering assessment by Waterman Moylan Consulting Engineers stating that the site can be drained and that safe access and all utility services can be provided to the site.

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 L1 – Strategic Reserve to A2 New Residential in the Development Plan.

2.0 PLANNING CONTEXT

2.1 The submission lands extend to c8hectares and are edged red on the site location map below. It should be highlighted that there is planning permission for c480 dwellings to the north of the site granted under An Bord Pleanála Ref. ABP-304782-19 and also a multi-unit residential development is nearing completion to the south. The setting of the submission lands relative to these two developments is identified on the site location map below.

2.2 In effect the submission lands are enveloped by existing or permitted developments. In granting permission for the development of the lands to the north An Bord Pleanála confirmed that the lands to the north were suitable for development including in terms of proximity to services in Blackrock, such as educational, community, leisure, recreational, retail and other commercial services. Given the submission lands are closer to the centre of Blackrock village than the development permitted by An Bord Pleanála under 304782-19, then it has to follow that the submission lands are even better related to the village centre than the land to the north.



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. "Site" 16 within which the submission lands are located scores poorly in the Planning Authority assessment primarily because of severe negative marking for "Proximity to Town Centre", "Consolidate /compact Growth" and "Infill/backland" development. It is contended that these poor scores only arise because of pre-determined assessment criteria that inevitably led to high (poor) scores. It is evident that in granting permission for the lands to the north An Bord Pleanála concluded that the site to the north, which is further away from the centre of Blackrock than the submission lands, scored well in terms of its relationship to the settlement. It does not then make sense for the Planning Authority assessment to conclude that lands closer to the village centre should score badly by comparison to lands further away from the centre of the village.

3.2 It is also worth noting that "site 16" includes the lands to the north which now have the benefit of planning permission. Again, it is difficult to rationalise a scenario where planning permission has recently been granted for a large residential development on part of "site 16" and yet the balance of that site (the submission lands)

score poorly especially when the submission lands are closer to the village than the balance of the “site 16” lands.

3.3 We also submit that the high (poor) score attached to site 16 including the submission land cannot be justified in any objective assessment. The site is given a poor (high) score of 4 for “Contribute to Consolidated/compact growth”. Clearly, the development of the subject lands will contribute to urban consolidation and compact development being effectively wedged between a large site with permission and a residential development immediately south which is nearing completion. It is also given a poor score of 4 for both proximity to town centre, proximity to shops and services and schools as well as infill/backland development.

3.4 It is acknowledged that the submission lands are not in direct proximity to the town centre of Dundalk, but if assessed at the neighbourhood level then they would have received a low (good) score for these assessment criteria. Similarly, the lands are clearly not infill/backland but again in a town seeking to become established as a Regional Growth Centre, this is not a reason to apply a high (poor) score to this particular criterion.

3.5 The lands score well in terms of availability of infrastructure, services and utilities and the attached Engineering Assessment by Waterman Moylan confirms the lands can be drained, serviced with necessary utilities and provided with a safe access. The lands score well in terms of availability of infrastructure including roads, footpaths, public lighting, wastewater and water supply.

3.6 It is submitted that the lands the subject of this submission would receive a very low (good) score by way of a more refined and site specific assessment. The community facilities map below illustrates the range of facilities in proximity to the lands, yet this consideration was not factored into the “Tiered Assessment Analysis” for the site.

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

4.1 We would also highlight that 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.

4.2 Taking the above into account the proposal within the Draft Plan to essentially de-zone large tracts of land previously zoned for residential development in the Dundalk area, through the application of the L1 – Strategic Reserve zoning as contained in the Draft Plan cannot be justified. It is noted no such large-scale de-zoning of residential land is proposed for Drogheda even where the Plan recognises that development will take place over several Plan cycles.

4.3 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 proposes to de-zone large tracts of land previously zoned for residential development, including the submission lands, only serving to further constrict housing supply. Such an approach severely undermines the ability of Dundalk to grow to a population of at least 50,000 as per the Regional Spatial and Economic Strategy (RSES).

4.4 It should also be pointed out that the new L1 – Strategic Reserve zoning does not apply to any lands in the Drogheda area and all lands zoned residential in the Drogheda area are retained in the new Plan. This contrasts with Dundalk where large-scale de-zoning of lands currently zoned for residential development is proposed.

5.0 AVAILABILITY OF COMMUNITY FACILITIES IN PROXIMITY TO THE SUBMISSION LANDS

5.1 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”.

5.2 The area within which the submission lands are located is well served by neighbourhood uses and is within a comfortable 15 minute walk to the centre of Blackrock. Contained within this area are a supermarket, small shops and other commercial uses, a crèche, community uses, as well as a pub/restaurant as well as sports, recreation and other leisure facilities. There is no short-fall in community facilities in the area to serve an emerging residential population.

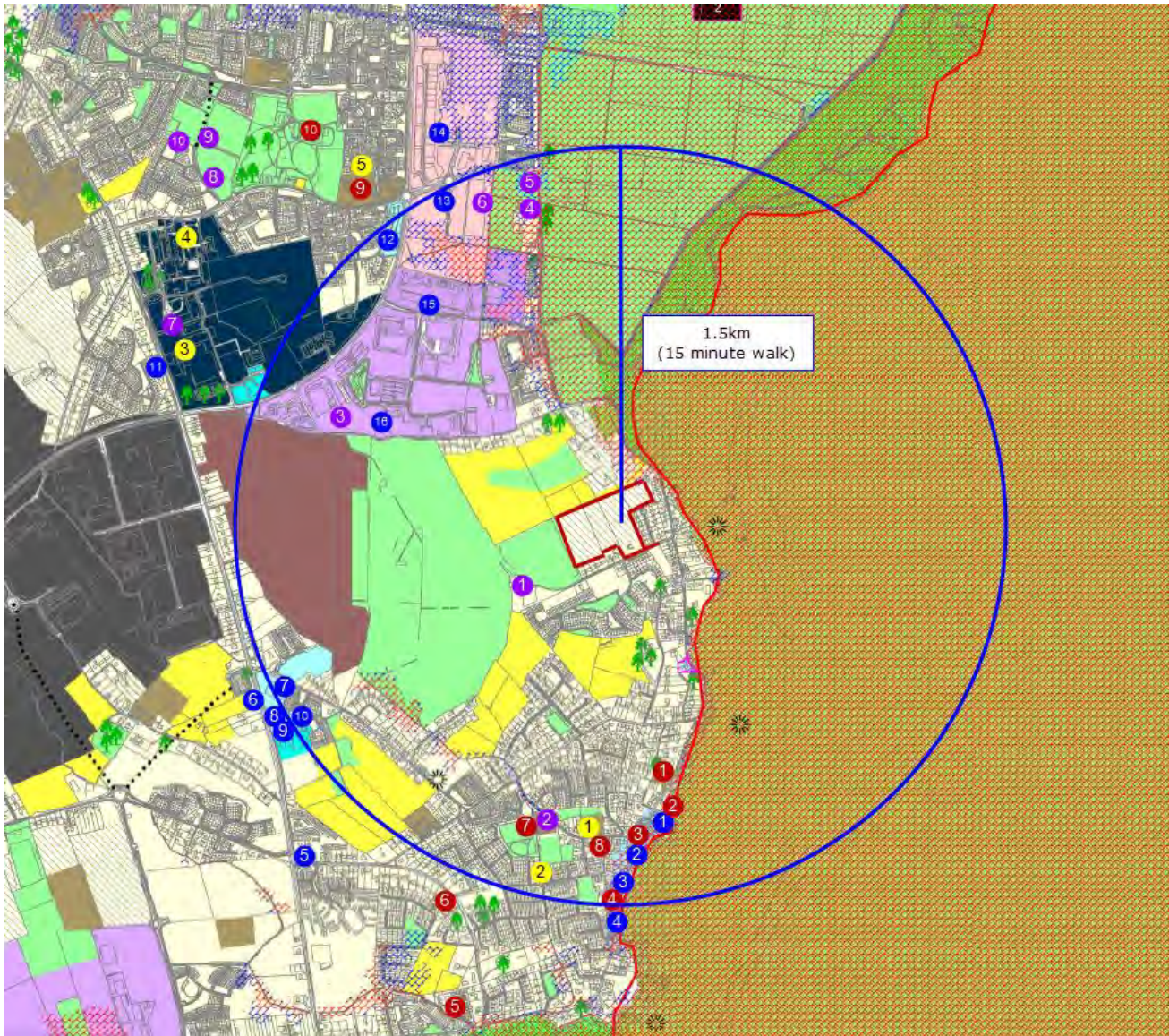


Figure 2 - Community Audit Map

Sports / Recreation	
1	Golf Club
2	Football Club
3	Walking Circuit
4	GAA Club
5	Football Club
6	DKIT Sport
7	College Sports Grounds
8	Pitch & Putt
9	GAA Club
10	Football Club

Community Services	
1	Church
2	Dental Surgery
3	Medical Centre
4	Medical Centre
5	Nursing Home
6	Veterinary Surgery
7	Community Centre
8	Garda Station
9	Church
10	Community Centre

1	Centra
2	Restaurant
3	Café
4	Restaurant
5	Restaurant
6	Filling Station
7	Café
8	Café
9	Pharmacy
10	Supervalu
11	Filling Station
12	Dunnes
13	KFC
14	Dundalk Retail Park
15	Finnibair Industrial Estate
16	Catering/Takeout/Delivery Company

Schools	
1	St Oliver Plunkett NS
2	Childcare Facility
3	DKIT
4	PLC
5	Gaelscoil

— Site boundary

6.0 THE ROLE AND PURPOSE OF POPULATION TARGETS

6.1 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.

6.2 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*”. The polar opposite approach is being adopted by the Planning Authority to population growth and housing development at Dundalk where the Plan tries to constrain and inhibit growth by de-zoning large areas of land previously zoned for residential development. It is strongly contended that the submission lands are highly suited to residential development in the Plan period and there is no justification to de-zone them in the new Development Plan for the area. There is no justification for this approach. The approach being adopted by the Planning Authority is one that sets population targets as a ceiling or cap to be frowned upon if breached. This 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.

7.0 POPULATION PROJECTIONS MUST BE TREATED WITH GREAT CAUTION

7.1 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.

7.2 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.

7.3 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.

8.0 LACK OF NATIONAL GUIDANCE FOR DEVELOPMENT PLAN PREPARATION

8.1 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.

9.0 THE DRAFT COUNTY PLAN AND POPULATION GROWTH

9.1 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.

9.2 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. These columns are not really comparable 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.

9.3 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.

9.4 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.

9.5 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”.

9.6 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”.

9.7 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.

10.0 THE CORE STRATEGY AND HOUSING LAND ALLOCATION

10.1 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.

10.2 In the absence of national guidance on such fundamental elements that form the basis of land allocations i.e. Housing Strategies and Guidelines on the preparation of Development Plans, it is respectfully suggested that the ‘De-zone strategy’ presently proposed for Dundalk should not be adopted and rather existing residential zoned lands should be re-instated and a plan-monitor-manage approach should be adopted to planning applications on lands zoned for residential development. The adoption of the L1 – Strategic Reserve ‘strategy’ is in effect a de-zoning strategy that serves no purpose other than to inhibit Dundalk achieving its status as a Regional Growth Centre with a population of at least 50,000.

10.3 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.

10.4 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 that the L1 zoning as it relates to lands zoned for residential development in the existing Dundalk and Environs Plan is far too blunt an instrument to assess development rates and should be removed and the existing residential zoning reinstated. There would then be 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.

10.5 If the L1 – De-zoning approach is adopted and the main proposed residential allocations do not come forward then there are really no alternatives available within the adopted Plan mechanism. This 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.

As 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.

11.0 THE 'TRAFFIC LIGHT' LAND ALLOCATION SYSTEM

11.1 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. 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. The main concern is that the outcome is to a degree pre-determined by the system adopted and unsuited to application at a large town designated as a growth centre. In particular, 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.

11.2 A further concern is that all sites were assessed relative to proximity to the town centre only. Whilst relationship to the town centre is a valid consideration, it is only one such consideration. In a growth centre, it would also be relevant to assess a site by reference to surrounding facilities at neighbourhood level and in this case proximity to the facilities at Blackrock village. It is not a simple concentric assessment relative to the centre of the settlement.

11.3 It is disconcerting that such broad-brush land areas were used. For example the "site" that the submission lands are in is referenced at Site 16, but this is not a "site" at all. There is little rationale that concludes the site has a really poor score in the land assessment when a substantial portion of the land already has the benefit of planning permission. It is not helpful to undertake such a broad-brush assessment over such wide land areas and title it as a tiered site assessment.

12.0 A TIERED APPROACH TO ZONING

12.1 Map 2 at Appendix 2 to the Plan is entitled "Dundalk Tiered Assessment Map". It is contended that there are in fact no tiers to the residential zoning provisions of the Draft Plan. Lands are either zoned for development or they are not. There is no contingency in the event that lands do not come forward for development. Similarly, there are sites that would have a better (lower) 'Traffic Light Score' than some of the sites that have been de-zoned.

13.0 SUMMARY AND CONCLUSION

13.1 As noted by the Director of the Eastern and Midland Regional Assembly (EMRA) 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, encouraged and considered a success. The polar opposite approach is being adopted by the Planning Authority to population growth and housing development at Dundalk where the Plan tries to constrain and inhibit growth by de-zoning large areas of land previously zoned for residential development simply to control population growth. There is no logic to this approach or justification for this approach and a similar approach is not proposed for Drogheda.

13.2 It is submitted that the approach to zoning of land for residential development for the Dundalk area in the Draft Louth County Plan is not only unjustified but if adopted would severely inhibit Dundalk achieving one of the main Regional Planning Objectives for the town which is for Dundalk to become a Regional Growth Centre with a population of at least 50,000. It is submitted that if adopted the housing land allocations for Dundalk as proposed in the Draft Plan would severely underestimate the amount of land required and unnecessarily constrain the development of the town.

13.3 In the absence of national policy guidelines on the preparation of Housing Strategies and Housing Need Demand Assessments as well as the absence of the updated national guidelines on the Preparation of Development Plans, it is unwise to follow the severely restrictive approach to residential zoning as proposed in the Draft Plan. Until these new national guidelines are available a far more flexible approach to residential land use zoning should be adopted. This submission therefore calls for the removal of the L1 Strategic Reserve zoning from the Plan and the reinstatement of all lands previously zoned for residential development with an A2 zoning in the proposed Plan. A “plan-monitor-manage” approach should then be adopted to control the release of residential development land, is such control is necessary at all.

13.4 In order to allow sufficient flexibility in the event other residentially zoned lands do not come forward, including for example other greenfield sites and/or brownfield lands and to provide for a Brexit factor and also to allow market choice, the submission lands should be identified for development within the period of the new Development Plan and zoned A2 – New Residential. These lands are not environmentally constrained. The lands are well related to planned and permitted development. Being located between a permitted and an existing multi-unit residential development, the development of the submission lands would, without doubt represent compact growth and contribute to consolidation of the urban area. The lands can be serviced and safe access can be provided.

TECHNICAL NOTE

Project:	Birch's Lane, Dundalk	Job No:	20-117
Subject:	Summary Engineering Assessment	Revision:	0
Prepared by:	J. Gibbons	Date:	14/12/ 2020
Checked by:	J. Gibbons	Date:	14/12/ 2020
Approved by:	<i>Joseph Gibbons</i>	Date:	14/12/ 2020

This technical note has been prepared in support of a submission to the draft Louth County Council Development plan 2021 – 2027.

The lands which are the subject of the submission are located at Birch's Lane, Dundalk, Co Louth. This technical note reviews the engineering infrastructure available to service the proposed development of the lands in terms of road access, foul water drainage, surface water drainage and water supply.

Road Access

The proposed development site is located adjacent to Birch's Lane, which is a 6m wide roadway. See Figure 1 below:-



Figure 1 – Site Aerial View indicating Birch's Lane.

Road access to the subject lands can be provided from Birch's Lane. There is adequate road frontage on Birch's Lane to achieve required sightlines. As part of any development proposals the existing footpath infrastructure can be extended along Birch's Lane to provide pedestrian connectivity to Blackrock village.



Figure 3 – Existing Water Supply

Surface Water Drainage

The development site is located adjacent to the Irish Sea. Although details are not shown on the drainage records it is reasonable to assume that there are surface water drainage sewers in both Birch's Lane and Blackrock Road. Any development on the subject site will be designed as a Sustainable Urban Drainage System (SuDs). In this regard, the first objective will be to discharge surface water back to ground if the underlying ground conditions are suitable for percolation. In the event that ground conditions are unsuitable for percolation then the surface water can be discharged to the existing surface water drainage infrastructure. Surface water discharged to the existing drainage infrastructure will be restricted to the equivalent of the existing agricultural runoff. Excess surface water will be stored on site in a suitable attenuation storage system. Outflows will be restricted by way of a hydrobrake or similar device.

Conclusion

The proposed development site is well located in terms of proximity to existing services and road access.

Development of the proposed site can be served by road access from Birch's Lane.

There are existing public foul sewers on Birch's Lane and Blackrock Road, both of which can facilitate a connection from the development site. It is however noted that the existing foul water infrastructure requires some upgrade works which Irish Water are currently addressing. It is considered that the foul water drainage constraints in Blackrock will be resolved by Irish Water in the next year or so.

TECHNICAL NOTE

There are existing watermains on Birch's Lane and on Blackrock Road. It is considered that these existing watermains can serve development on the subject site.

Surface water drainage will be designed as a sustainable urban drainage system. Surface water runoff from the site will be discharged back to ground should the ground conditions permit. Otherwise, the surface water runoff will be restricted to the existing agricultural runoff and discharge to the existing drainage infrastructure on Blackrock Road and/or Birch's Lane.

In summary it is considered that the subject site can be adequately serviced to facilitate development on the site.