

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

15<sup>th</sup> 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 MCPARLAND BUILDERS (IRE) LTD – LANDS AT OLD NEWRY ROAD,  
DUNDALK, COUNTY LOUTH**

McParland Brothers (Ire) Ltd of Newry Road, Carrickarnon, Ravensdale, 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 at Old Newry Road / Doylesfort Road, 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 the McParland Brothers (Ire) Ltd are attached.



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## **1.0 INTRODUCTION**

1.1 The submission lands are identified edged red on the site location map below. The lands are broadly triangular in shape and are bounded to the west by the Doylesfort Road, to the east by the rear of properties fronting the Old Newry Road and to the north by the line of a Link Road the implementation of which is an objective of the Draft Plan.

1.2 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 Draft Plan.

## **2.0 PLANNING CONTEXT**

2.1 The submission lands extend to c20 hectares and are edged red on the site location map below. It is proposed that 2.5 hectares towards the southern part of the lands would be given over to the Dowdallshill GAA Club for use to expand the Club's playing facilities. It should be highlighted that there is a planning permission for site development works for a business park just to the north of the submission lands. This is PA Ref 09/879. This permission has recently been extended (20/122TE) and under the time extension the permission now expires in February 2026. The northern boundary of the lands is defined by a development objective of the Draft Plan to provide a proposed Link Road connecting the Old Newry Road to the Armagh Road.

2.2 The submission lands have very well planned or existing defined boundaries which are defined by existing or proposed roads. The boundary to the west is the Doylesfort Road whilst to the east are the rear of properties and land that front the Old Newry Road. The future Link Road, which it is an objective of the Development Plan to provide will form the northern boundary beyond which lies the permitted business park. The lands are environmentally unconstrained.

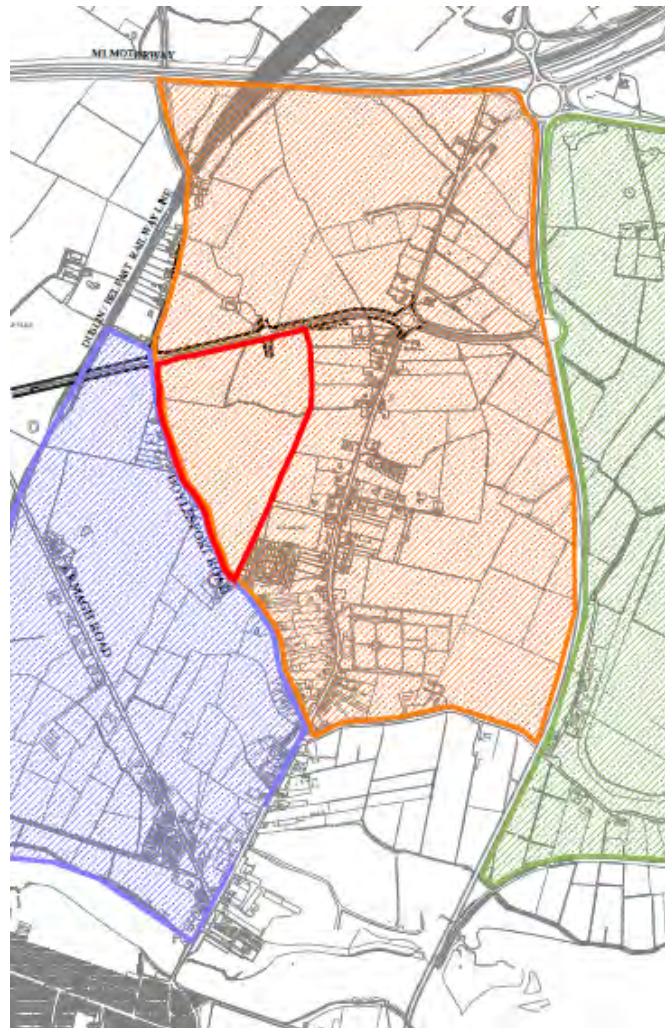


Figure 1 - Site Location Map

2.3 The construction of the Link Road is inextricably linked to the development of the lands to the north and south of that proposed road. It makes little economic or planning sense to construct a Link Road within an urban area and only have that road serving development on one side. This is especially the case when the submission lands are closer to the town centre than the permitted employment lands to the north.

2.4 The zoning of the submission lands for residential development within the period of this Development Plan 2021 – 2027 would facilitate the achievement of a specific objective of the Development Plan to provide the Link Road between Old Newry Road and Armagh Road. The Link Road is an expensive item of infrastructure and as such development on both side (employment to the north and residential to the south) would make the project far more financially viable. It would also make more sense in terms of the proper planning and sustainable development of the area.

2.5 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.

***2.6 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 development areas are expected to be undertaken over several Development Plan periods.***

2.7 By reference to the Draft Zoning Map for Dundalk, it is apparent that most of the land previously zoned for residential development to the north of the town have been de-zoned to the L1 – Strategic Reserve zoning. The adoption of this strategy would result in imbalance between the amount of employment zoned lands to the north of the town relative to the amount of residentially zoned land in the same area. The proposals in the Draft zoning map if adopted would create a scenario where the population would have to travel to get to the main employment areas in the northern part of the town. This, it is submitted would be a retrograde step in terms of the creation of sustainable neighbourhoods where people can work, reside and recreate in close proximity. It is respectfully suggested that such geographical segregation of land uses is a backward step in terms of the proper planning and sustainable development of the area. Sustainable development principles would suggest that people should live close to employment areas.

***2.8 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 only serving to further constrict housing supply. 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).***

***2.9 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.***

**3.0 AVAILABILITY OF COMMUNITY FACILITIES IN PROXIMITY TO THE SUBMISSION LANDS**

3.1 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”.*

3.2 The area within which the submission lands are located is well served by neighbourhood uses with the southern part of the Old Newry Road acting as a neighbourhood centre for the northern environs of Dundalk. 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.

***3.3 Of particular relevance to this submission is that it creates an opportunity for a westward expansion of the Dowdallshill GAA club and this element forms part of this submission. There is considerable community gain in this element of the proposal.***

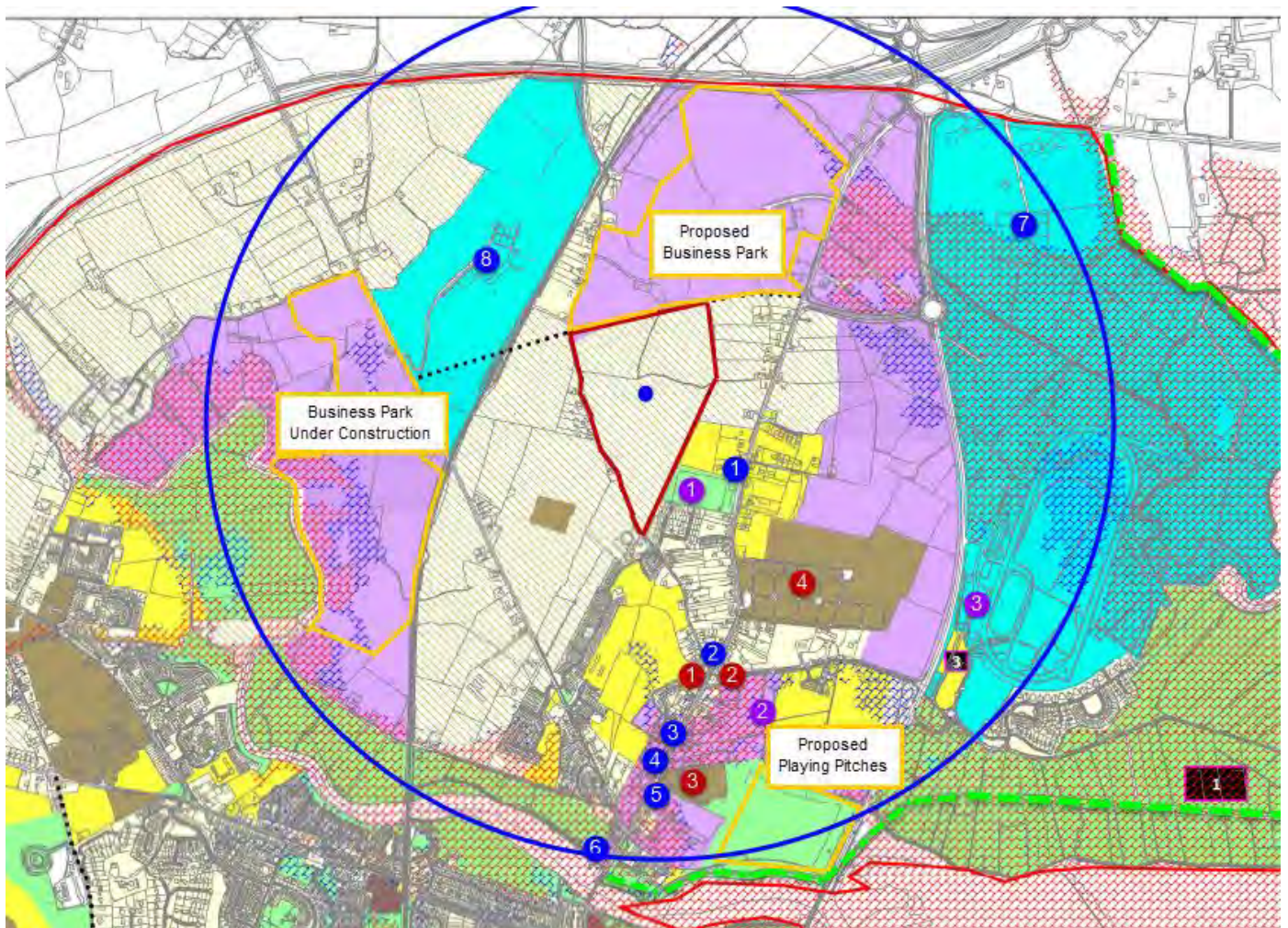


Figure 2 - Community Audit Map

Community	
1	Crèche
2	Community Centre
3	Public Recycling Centre
4	Cemetery

Retail Services	
1	Shop
2	Shop
3	Driving School
4	Aldi
5	Filling Station
6	Restaurant
7	Restaurant
8	Hotel and Spa

Sports / Recreation	
1	GAA Playing Pitch
2	Bowling Alley / Bingo Hall
3	Stadium

- Subject Site
- 15-minute Walk Radius
- Proposed Developments
- - - Proposed Greenway

#### **4.0 THE ROLE AND PURPOSE OF POPULATION TARGETS**

4.1 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.

4.2 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. 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. There is no justification for this approach. The approach 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.

4.3 It is submitted that in the absence of national guidance on preparing development plans and on the preparation of housing strategies 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.

#### **5.0 POPULATION PROJECTIONS MUST BE TREATED WITH GREAT CAUTION**

5.1 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.

5.2 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.

5.3 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.

## **6.0 THE DRAFT COUNTY PLAN AND POPULATION GROWTH**

6.1 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.

6.2 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. 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.

6.3 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.

***6.4 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.***

6.5 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”.*

6.6 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”.*

***6.7 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.***

## **7.0 THE CORE STRATEGY AND HOUSING LAND ALLOCATION**

**7.1 County-Wide Land Requirements** – It is submitted 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. Development on these sites only produces positive outcomes in terms of 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.

***7.2 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.***

7.3 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.

***7.4 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.***

***7.5 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.***

***7.6 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.***

#### **8.0 THE ‘TRAFFIC LIGHT’ LAND ALLOCATION SYSTEM**

8.1 The situation as outlined above is compounded when the greenfield allocation is considered in the context of the ‘Traffic Light’ assessment system as proposed in the draft Plan. 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 to the Draft Plan.

8.2 It is submitted that the Traffic Light assessment system used 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. 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.

8.3 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. It is not a simple concentric assessment relative to the centre of the settlement.

8.4 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 6, but this is not a “site” at all. It is a huge tract and expanse of land stretching well over a kilometre from the Castletown River to the Old Newry Road. The area is in multiple ownerships and there are sites within that area with the benefit of planning permission. Many of the sites within this broad area display widely varying characteristics ranging from housing market, through to topography, availability of infrastructure and environmental considerations. It is not helpful to undertake such a broad-brush assessment over such wide land areas and title it as a tiered site assessment.

### **9.0 A TIERED APPROACH TO ZONING**

9.1 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.

### **10.0 APPLICATION OF ‘TRAFFIC LIGHT’ LAND ALLOCATION SYSTEM TO THE SUBMISSION LANDS**

10.1 The submission lands would score well in terms of availability of infrastructure including roads, footpaths, public lighting, wastewater and water supply. Notwithstanding that “Site” 6 within which the submission lands are located scored poorly 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 inevitability led to high (poor) scores. For example, it is acknowledged that the submission lands are not in direct proximity to the town centre, but is assessed at the neighbourhood level then they would have received a low (good) score for this assessment criterion. 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.

10.2 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 attached to this submission illustrates the range of facilities in proximity to the lands, yet this consideration was not factored into the “Tiered Assessment Analysis” for the site.

### **11.0 SUMMARY AND CONCLUSION**

11.1 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. There is no justification for this approach and a similar approach is not proposed for Drogheda.

11.2 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.

11.3 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.

11.4 The submission lands are a key remaining land parcel of the landowner’s land bank and with developments now completing on his other landholdings in the area this particular landholding is now being prepared for future development. De-zoning of the land at this stage would have a severe negative impact of his business plan, on his employees and on the future delivery of housing in Dundalk.

11.5 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 an obsolescence 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 including the permitted business park to the north of the proposed Link Road. The lands can be serviced and safe access can be provided. In addition, the development of the lands for residential purposes would facilitate an extension to the Dowdallshill GAA grounds and also make the Link Road objective of the Draft Plan far more achievable. The submission lands extend to c20 hectares. It is proposed that 2.5 hectares towards the southern part of the lands would be given over to the Dowdallshill GAA Club for use to expand the Club’s playing facilities