

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

16th 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 F & R MCARDLE – LANDS AT ARMAGH ROAD, DUNDALK, COUNTY LOUTH**

Frank and Ronan McArdle of _____ have 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
the Armagh 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 Frank and Ronan McArdle 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 23 hectares and are identified edged red on the site location map below.

1.2 The lands have the benefit of planning permission for c580 residential dwellings in the form of houses, apartments and duplex dwellings. As part of the permissions on the lands a site is reserved for a neighbourhood centre includes a school site and a crèche.

1.3 The reference numbers for the planning permissions on the lands are 08/520189as extended under 18/1061 with an expiry date of 11th December 2024 and 08/1013 as extended under 18/1060 and with an expiry date of 22nd. November 2024.

1.4 Clearly, with recently extended permissions for residential development on the lands it follows that the lands can be drained and that safe access and all utility services can be provided.

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 As noted the lands have a positive planning history with planning permissions granted for c580 dwellings and with those permissions now extended until the latter end of 2024. It is evident that a development of that scale will take time to construct and sell and it is not reasonable given the housing market in Dundalk to expect the development to be completed by the end of 2024. Even if 70 dwellings were constructed and sold each year on the site, which would be a very high market expectation for this area of Dundalk, it would take over 8 years to complete the development.

2.2 Construction is expected to commence on site in early 2021 and a major concern of the proposed developer is that it will not be possible to construct all of the dwellings to substantial completion stage before the permission expires and that the permissions will expire in the middle of construction of the development. With the proposed L1 – Strategic Reserve zoning on the lands it will not then be possible for the existing permissions to be extended or for new permissions to be granted under the L1 zoning. This concern is made worse as the reserved neighbourhood centre, school site and crèche are important parts of the creation of this new neighbourhood and as these are located towards the centre of the site it concern is that the permission for these elements of the development would also expire. As with the construction of the houses on the site, the L1 – Strategic Reserve zoning would not facilitate new permissions for the school site, the neighbourhood centre or the crèche.

2.3 It is submitted it is not rational or in the interests of the proper planning and sustainable development of the area to de-zone these lands when development is expected to commence in 2021 and when the lands have the benefit of planning permission. Indeed, even applications to vary or amend house types might be called into question if the lands are de-zoned and therefore no longer have a residential development zoning objective.

2.4 In addition to the fact that the lands have the benefit of planning permission, it is submitted 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. The range of community, leisure, recreational, educational and commercial facilities within a 15 minute walk (1.5 kilometres) of the site are illustrated on the Community Facilities Map contained within this submission.

2.5 In assessing the applications to extend the period of the existing permissions on the lands (time extension permissions) compliance with current national, regional and local planning policies would have been assessed. Clearly, it permitting the time extensions the Planning Authority is of the opinion that residential development on the lands conforms to all current national, regional and local planning policies and development management requirements. It is worth noting that the reserved site for the school, crèche and neighbourhood centre remains in place in the zoning map for the Draft Plan notwithstanding that the residential zoning has been removed and replaced with the L1 – Strategic Reserve zoning.

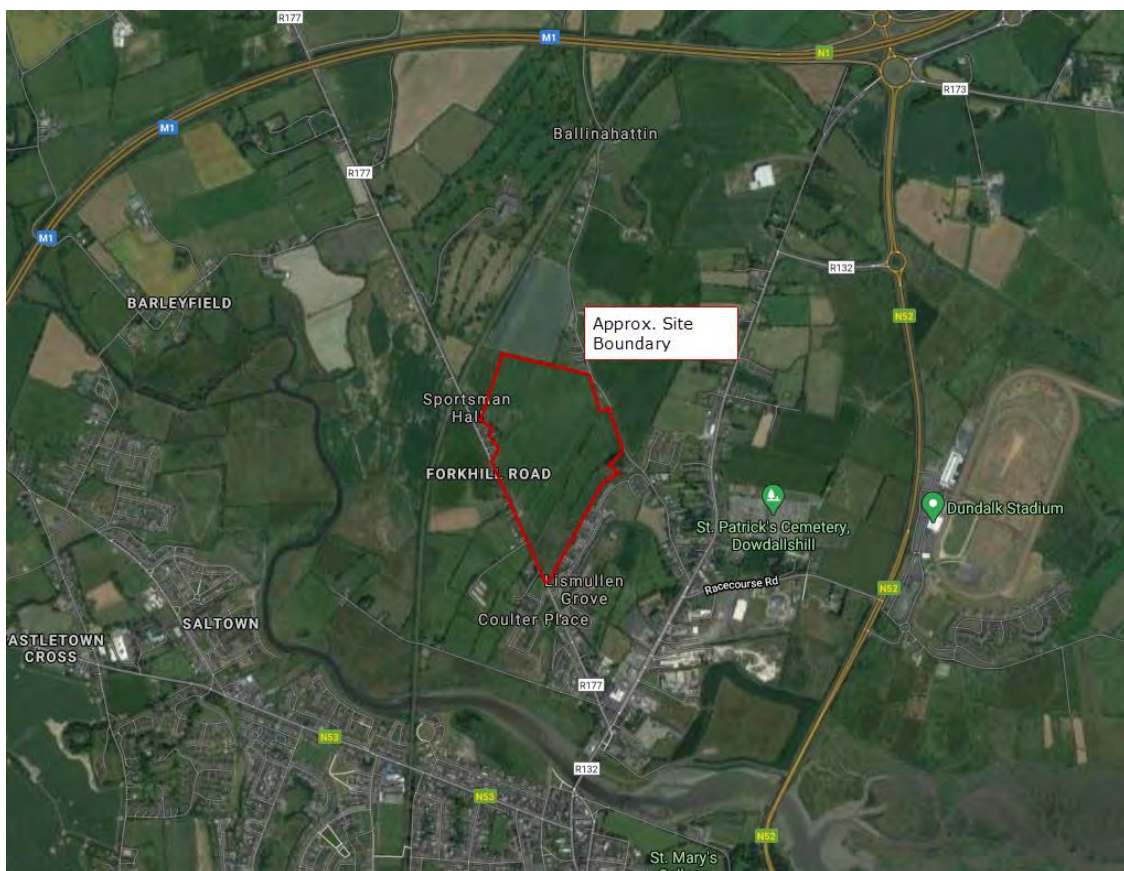


Figure 1 - Site Location Map

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" 6 within which the submission lands are located is an extensive land area stretching north from the Castletown River, incorporating lands either side of the Armagh and Doylesfort Roads with the northern boundary being formed by a proposed Link Road beyond which lies a large site with the benefit of planning permission for a business park.

3.2 It is submitted there is no real rationale to apply the 'Traffic Light System' over such an expansive land area. If such a system is to be applied it must be done on a far more site specific and finessed way. In the case of Site 6 it is unreasonable to apply the same score to land with the benefit of planning permission as lands that do not have permission. Equally, it is not reasonable to apply the same scores to a part of the "Site" such as the submission lands that has direct access to a public roads system with footpaths and public lights and that can be drained and where all utilities are available as to parts of the "site" that has none of these facilities.

3.3 The submission lands (as part of the "Site 6" area) score 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 inevitability led to high (poor) scores and because such a wide geographical area is assessed as a single site as if the whole area displays the same land use characteristics.

3.4 It is submitted that the high (poor) score attached to site 6 including the submission lands cannot be justified in any objective assessment. The site is given a poor (high) score of 5 for each of the headings "Proximity to Town Centre", "Contribute to Consolidated/compact growth", "Infill/backland" and "Availability of Public Services". Clearly, the development of the subject lands will of themselves contribute to urban consolidation and compact development especially as the overall development is designed as a new neighbourhood with provision for a primary school, neighbourhood uses and a crèche.

3.5 Whilst the lands are clearly not infill/backland but again in a town seeking to become established as a Regional Growth Centre and with the development forming a new neighbourhood, this is not a reason to apply a high (poor) score to this particular criterion.

3.6 The lands clearly score well in terms of availability of infrastructure, services and utilities as they have the benefit of planning permission. This is in contrast to other lands in the same "site" area where such services as not available. This situation demonstrates that the broad-brush approach adopted in the Development Plan for site availability assessment is entirely unsuited to achieving a rational and evidence-based outcome.

3.7 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 fact that the proposed development incorporates neighbourhood facilities and 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 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 As illustrated on the Community Services Map the proposed neighbourhood centre / crèche and reserved school site are central to the proposed development area. Contained within 15 minutes of the site are shops and other commercial uses, a crèche, community uses, 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.

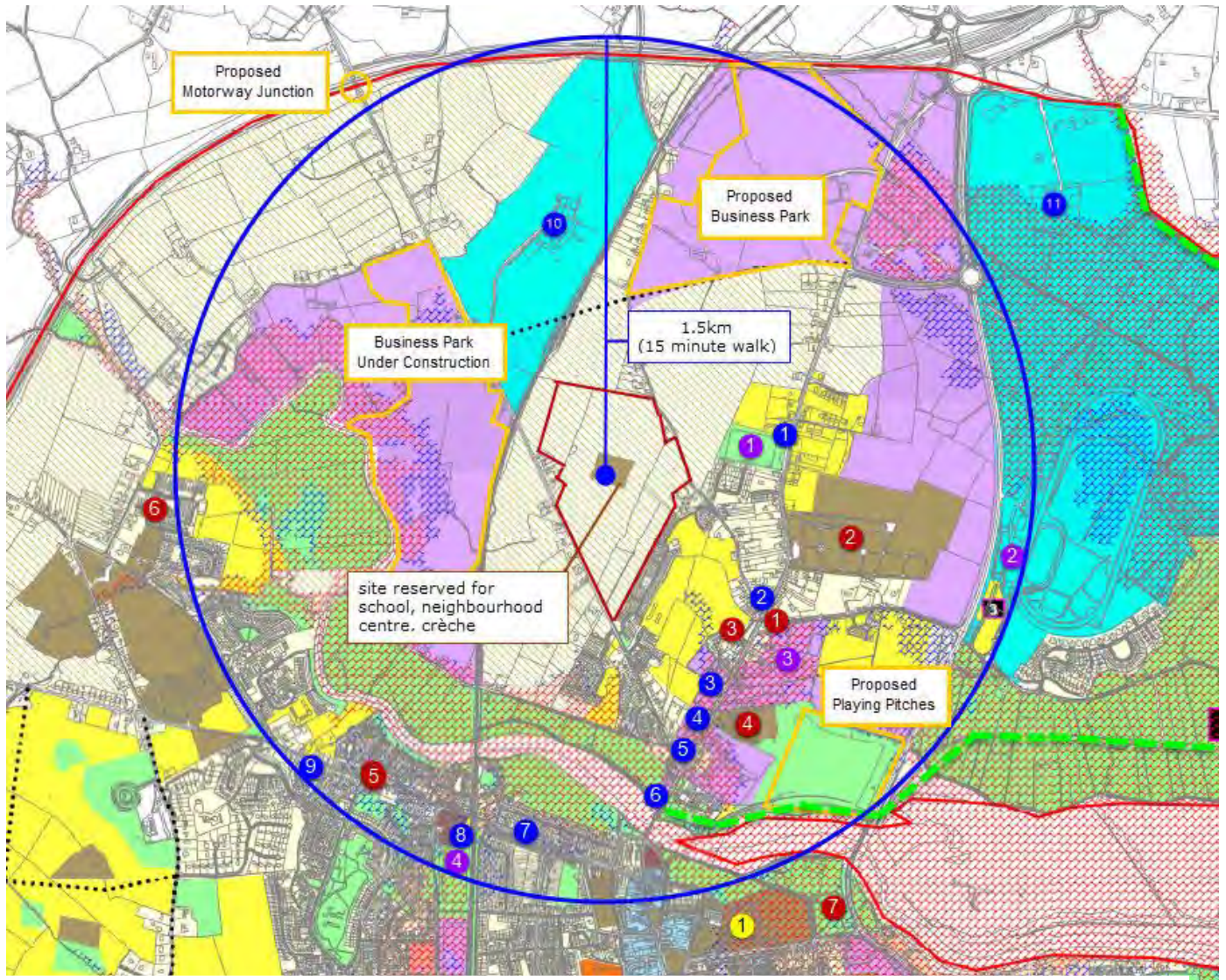


Figure 2 - Community Audit Map

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

Retail	
1	Shop
2	Shop
3	Driving School
4	Aldi
5	Restaurant
6	Filling Station
7	Pharmacy
8	Veterinary Clinic
9	Restaurant / Gastro Pub
10	Hotel and Spa
11	Restaurant

Community Services	
1	Community Centre
2	Cemetery
3	Crèche
4	Public Recycling
5	Post Office
6	Nursing Home
7	Public Park

Schools	
1	St Mary's College and Grounds

- Site Boundary
- - - Proposed Greenway

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

5.1 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.

5.2 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.

5.3 It is submitted the proposal in the Draft Plan to de-zone the submission lands that actually have planning permission cannot be substantiated.

5.4 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).

5.5 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.

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.

6.3 It is strongly contended that having only recently permitted time extensions for the two permissions on the site the Planning Authority is of the opinion 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. 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.

8.2 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.

8.3 Similarly, and this is submitted as being highly likely in any new national guidelines, what is the response if policy emerges stating that extant permissions should be considered as committed development and should not be de-zoned?

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. 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.

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 in 2019 in the Eastern and Midland Regional Spatial and Economic Strategy. 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, Housing Needs Demand Assessments 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.

10.6 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. This level of flexibility is required at least until national policy becomes available.

11.0 OVERVIEW OF 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 large 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 and extensive broad-brush areas were looked at as opposed to a very site specific assessment which is a requirement for a study such as this to be accurate and successful. 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 neighbourhood centre proposed within the site and also the neighbourhood type facilities available at the Newry Road. 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 6, but as noted this is not a "site" at all. There is little rationale to conclude the site has a really poor score in the land assessment when the "site" extends over such a large geographical area that displays many different land-use characteristics. 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 the rate of population growth. There is no logic 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.

13.5 These lands have the benefit of planning permission and as such represent a planned and orderly expansion of the settlement. It is submitted there is no planning logic to de-zone lands that have the benefit of planning permission. It is also submitted given the extent of the proposed development comprising c580 houses with a site reserved for a primary school, neighbourhood uses and a crèche that necessary community, education, leisure, recreational and commercial services will be available within the site.

13.6 It is intended that development will commence on the site in 2021 but given the scale of the development and the projected rate of house sales, the development might not be completed before the 'life' of the permissions expire towards the end of 2024. With the development underway and partially constructed it may be necessary to seek further permissions to ensure the development is completed in the holistic manner originally intended including the school, crèche and neighbourhood centre but if the lands are de-zoned it might not be possible for the Planning Authority to grant such further permissions.