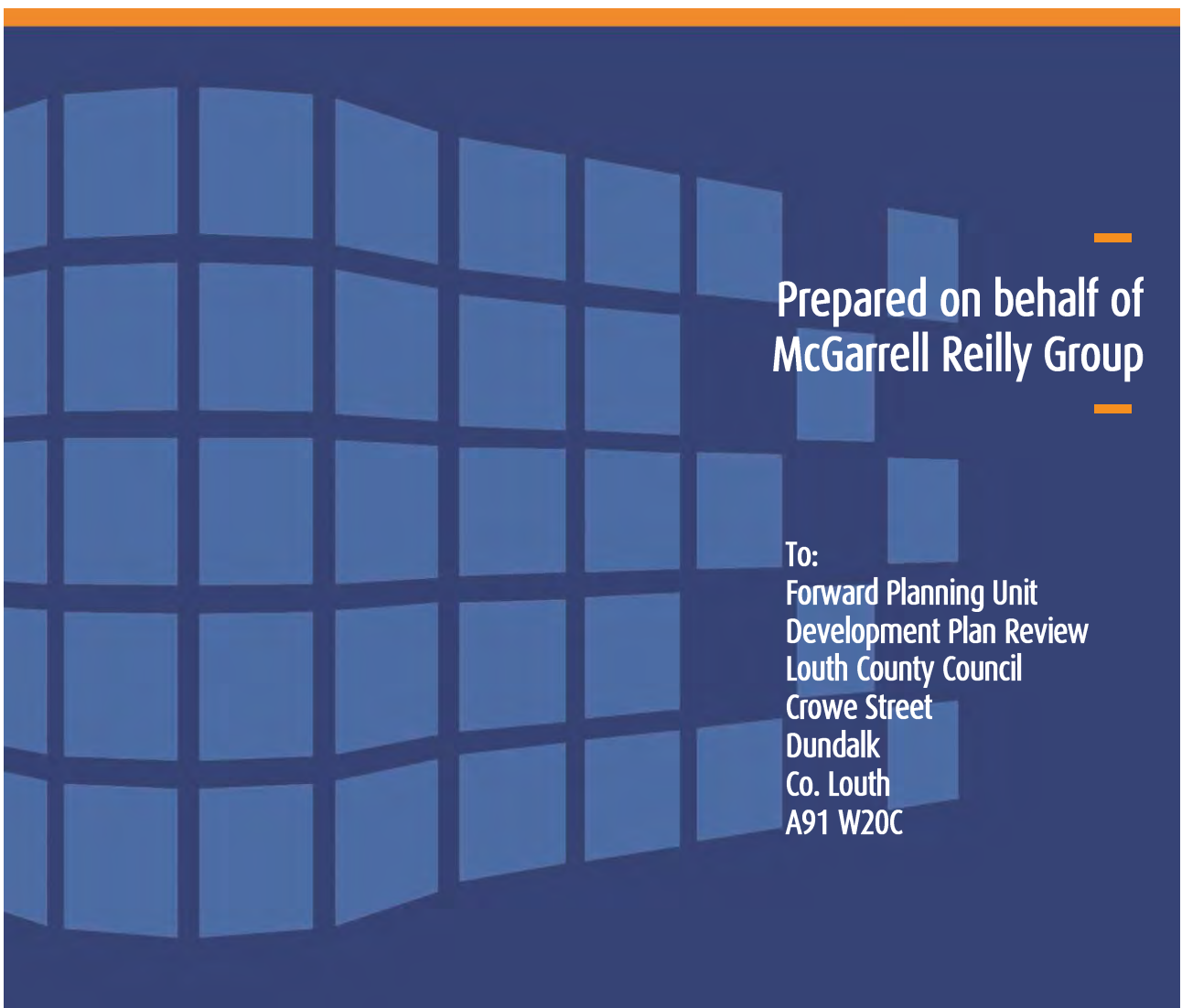


Submission to the Draft Louth County Development Plan 2021-2027

Lands at Marlmount, Dundalk, Co. Louth

December 2020



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1. Introduction and Site Context

McCutcheon Halley Planning of Kreston House, Arran Court, Arran Quay, Dublin 7, wish to make a submission on the Draft Louth County Development Plan 2021-2027, on behalf of our Client, McGarrell Reilly Group, based at Ground Floor, George's Court, 54-62 Townsend Street, Dublin 2. This submission has been prepared in respect of lands in their control at Marlmount in Dundalk, Co. Louth.

Our Client welcomes consultation on the Draft County Development Plan and the opportunity to participate in the plan-making process.

McGarrell Reilly Group are a longstanding and reputable housebuilder with extensive experience in residential and complementary mixed-use developments. Through their high standards of design, construction and project management they deliver innovative, successful new developments.

As a leading developer in Ireland, McGarrell Reilly Group are uniquely positioned to help address the chronic housing shortage. They own a significant quantum of strategically located lands and have proven their ability to deliver large scale high-quality developments in an expedient manner.

McGarrell Reilly Group is committed to working with Louth County Council in the delivery of much-needed new homes together with the associated infrastructure necessary to deliver new communities with improved and high-quality amenities. The company are seeking to bring their land forward for development in an efficient and timely manner to meet an evidential demand.

Our client's lands, the subject of this submission, measure 16.06ha and are located c.3.5km south of Dundalk Town and c.1.9km west of Blackrock Village, within the Haggardstown area, see **Figure 1**.

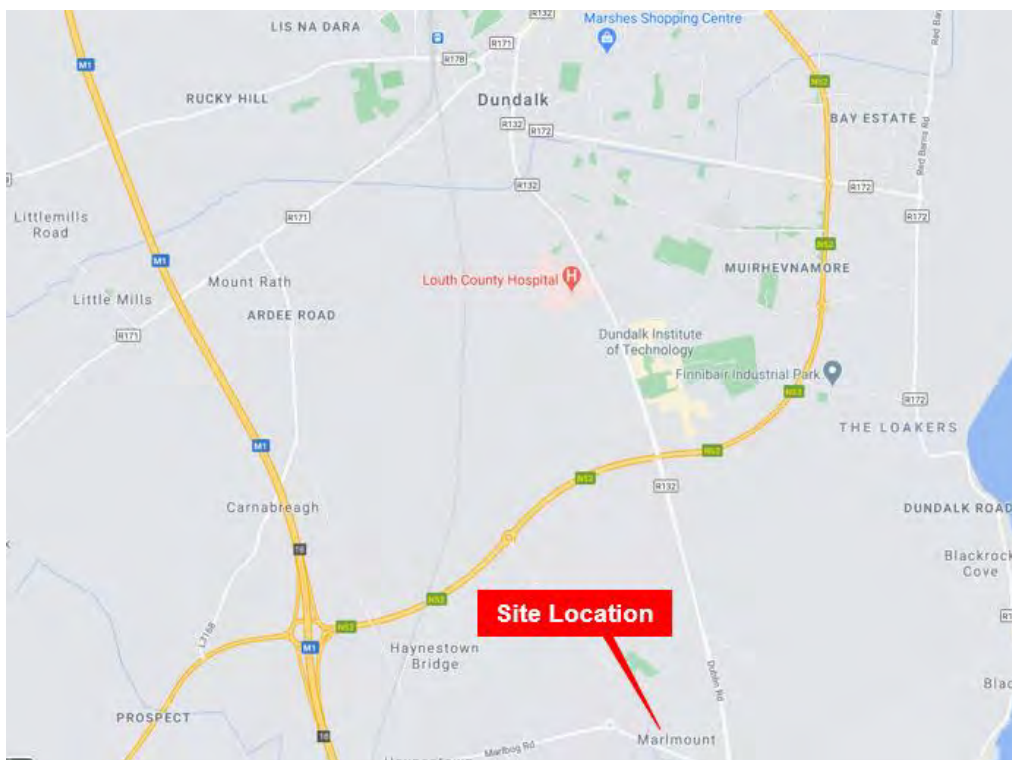


FIGURE 1 SITE LOCATION

The site benefits from a high level of connectivity, being situated approximately 350m west of the Dublin Road (R132) and c.1.75km east of the M1 Motorway which provide direct links between Dublin and Belfast. Vehicular access to the site is provided from Marlbog Road, a new distributor road. **Figure 2** provides an aerial view of the subject lands.



FIGURE 2 AERIAL VIEW OF SUBJECT LANDS

Located along the M1 route approximately midway between Dublin and Belfast, the settlement of Dundalk is served by a high capacity inter-city rail network. It also benefits from its proximity to the Dublin and Belfast international airports, being approximately 40 minutes commuting distance of Dublin International Airport and 1 hour commuting distance of Belfast International Airport and Belfast City Airport. Dundalk is a major centre for employment and government services, and has significant shopping, industry, education and transport facilities.

In accordance with the Dundalk and Environs Development Plan 2009-2015, the subject land is zoned Residential 1 (RES 1). Variation No. 1 to the Development Plan introduced a phasing designation on the site, whereby upon expiration of any planning permissions on land zoned 'Residential 1', the lands shall revert to Phase 2.

Under the Draft Louth County Development Plan 2021-2027, the subject land is proposed to be zoned 'A1 Existing Residential'. Our Client supports the proposed zoning of these lands having regard to the development history at this site, pattern of existing development on the surrounding lands, advantageous position of the site and the elevated status of Dundalk afforded by the National Planning Framework (NPF) and Eastern and Midland Regional Spatial and Economic Strategy (RSES).

The principal matters addressed in this submission relate to;

- National and Regional Planning Policy Framework
- Current Zoning and Status of Development
- Status of Dundalk as a Regional Growth Centre
- Core Strategy and Housing Need
- Proposed rezoning of our Client's lands from 'Residential 1' (Phase 2) to 'A1 Existing Residential'
- Density Standards and Recommendation

2. National and Regional Planning Policy Context

The Draft Louth County Development Plan has been prepared by the Planning Authority in accordance with Section 9(6) of the Planning and Development Act 2000 (as amended), to align with the current national and regional planning policy framework.

The NPF is the Government's high-level strategic plan for shaping the future growth and development of Ireland to 2040, in order to accommodate an estimated one million additional people. The NPF states that between 2018 and 2040, an average annual output of at least 25,000 new homes will be needed nationally. Further, it estimates that the population of the Eastern and Midland region will grow by 490,000-540,000 additional people during this period, attracting a substantial proportion of the forecast growth.

The NPF endorses a more balanced approach to growth to counter the current dominance of Dublin and the wider Eastern and Midland area. It aims to achieve a roughly 50:50 distribution of growth between the Eastern and Midland Region with the Southern and Northern and Western regions.

Within the Mid-East, employment creation, local infrastructure needs and addressing the legacy of rapid growth are identified as key priorities and the NPF states that *“housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.”*

The Eastern and Midlands Regional Spatial and Economic Strategy (RSES) implements the policies and objectives of the NPF at a regional level. The strategy seeks to direct future growth within the region (see **Figure 3**), establishing a settlement hierarchy based upon consideration of the availability of land, resources, environment and infrastructure capacity.

The RSES adopts a strategic approach over a twenty year period and covers three sub regions or Strategic Planning Areas (SPAs), namely the Dublin Metropolitan Area (DMA), the Core Region of peri-urban hinterlands covering the commuter catchment of Dublin and the Gateway Region being identified as strategically located inter-regional portals.

The Gateway Region incorporates Dundalk which is designated as a 'Regional Growth Centre' and the RSES seeks to protect and enhance strategic connections in this region. The Dublin-Belfast Economic Corridor is identified as the largest economic agglomeration on the island of Ireland with the cities and towns along the Corridor home to a population of around 2 million.

The Corridor connects the large towns of Drogheda, Dundalk and Newry by high-capacity national road and rail links, the major airports of Dublin and Belfast, as well as Belfast and Dublin ports. The Regional Growth Centres, including Dundalk are targeted for significant growth *“to enable them to act as regional drivers, with a focus on improving local economies and quality of life to attract investment”*.

The settlement hierarchy for the region supports significant population and economic growth in Dundalk and recognises that it will accommodate significant new investment in housing, transport and employment generating activity. The RSES envisages a population target of 50,000 for the entire settlement of Dundalk up to 2031.

Within this national and regional planning framework, the delivery of additional housing output remains a fundamental priority for the Irish Government and was the impetus for *Rebuilding Ireland - Action Plan for Housing and Homelessness* (2016). Rebuilding Ireland seeks to tackle current deficiencies in the housing sector by *inter alia* building more homes, improving the rental sector and accelerating social housing. A target established in Rebuilding Ireland is to double the delivery of new homes to over 25,000 units per annum between 2017 and 2021.



FIGURE 3 EMRA GROWTH STRATEGY - STRATEGIC CONNECTIONS (SOURCE: FIG. 3.1 RSES)

Construction of new housing stock is a fundamental aim of Rebuilding Ireland Pillar 3 – Build More Homes. It’s key objective is to increase the output of private housing to meet demand at affordable prices by doubling delivery of new homes to over 25,000 units per annum between 2017-2021. The CSOs New Dwelling Completions confirm that between 2017 and 2019, 53,720 new homes were delivered, this is 28% below the minimum target of 75,000 for this period. A concerted effort on the part of planning authorities to respond to this deficit, deliver additional housing to address the shortfall and plan for future growth is required.

3. Existing Zoning under Dundalk & Environs Development Plan 2013-2019 and Status of Development

Under the Dundalk and Environs Development Plan 2009-2015, the subject land is zoned Residential 1 (RES 1). The Zoning Objective for Residential 1 lands is: *“To protect and improve existing residential amenities and to provide for infill and new residential developments.”*

Variation No. 1 to Dundalk and Environs Development Plan 2009-2015 Core Strategy introduced a policy of prioritisation and phasing for new development on residential zoned lands, to ensure more sustainable patterns of development. As part of this new phasing approach, it was determined that upon expiration of any planning permissions on land zoned ‘Residential 1’, the lands shall revert to *Phase 2* unless located within the area identified as ‘Consolidation of the Urban Core’ or ‘Phase 1’ in Map B of the Core Strategy, See **Figure 4**.

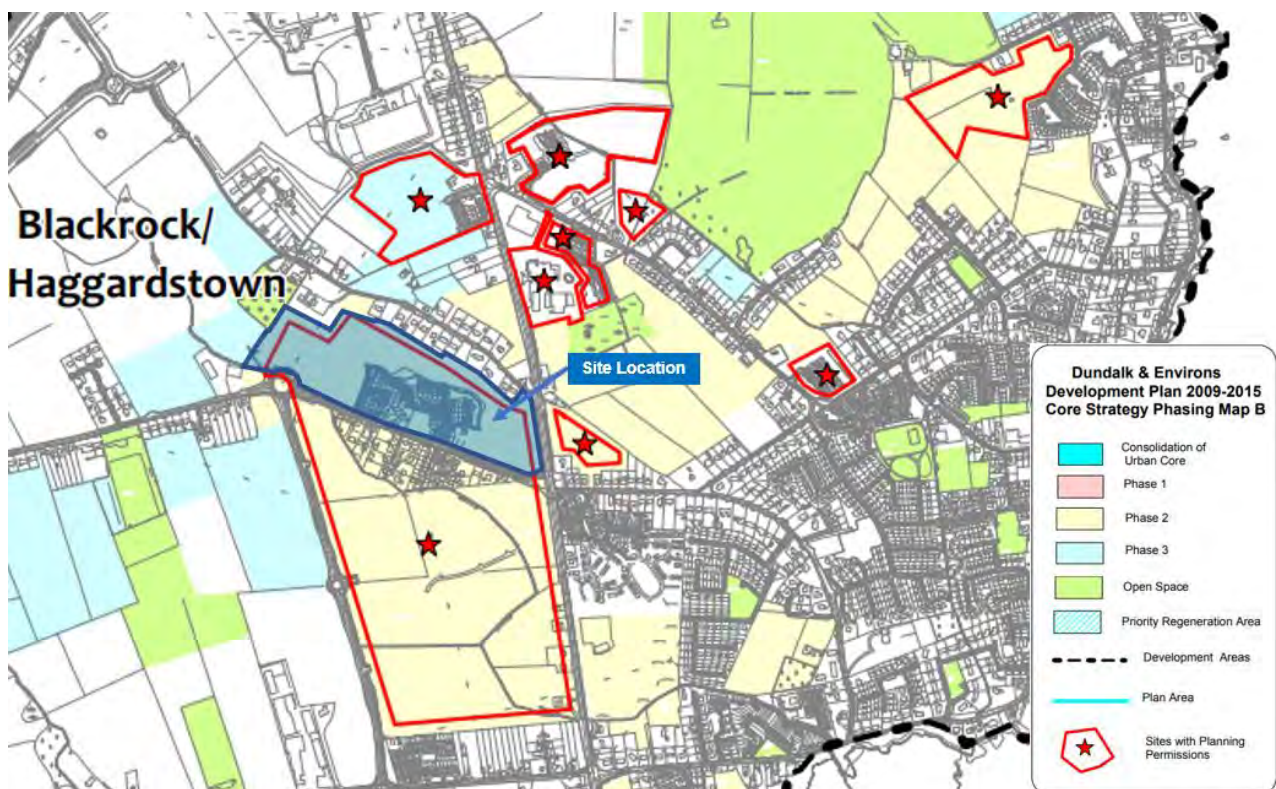


FIGURE 4 EXTRACT FROM DEDP 2009-2015 CORE STRATEGY PHASING MAP B

As indicated by the red star on Phasing Map B, the wider lands in Marlmount, which includes our Client’s site, benefitted from an extant planning permission when Variation No. 1 was adopted on 29th August 2011. The relevant permission (Reg. Ref. 03/1754) was granted on 21st April 2005 for the construction of a residential and mixed-use development including 1,450 no. dwellings, 76 no. commercial units, community centre, reserved site for a primary school and 5 no. reserved sites for crèches, as well as the construction of the proposed distributor road between Clermont Road and Marlbog Road and all associated site works. The permission was granted for a 10-year period and extended under Reg. Ref. 15/91 to 5th April 2020.

That part of the wider Marlmount site in our Client’s control is identified as Sectors 6 and 9, within the overall approved Masterplan. **Figure 5** shows the location of Sectors 6 and 9 within the context of the wider permitted development site.



FIGURE 5 LOCATION KEY MAP (REG. REF. 03/1754)

In accordance with the parent permission, our Clients have completed 151 no. houses which are now occupied in Sectors 6 and 9, together with associated site works, public open space and internal access roads. Since the parent permission lapsed in April 2020, our Client has also secured planning permission for a further 80 no. dwellings permitted under Reg. Ref. 19/804 (62 no. units, together with public open space and associated site works) and Reg. Ref. 20/856 (18 no. units, public open space and associated site works).

During the lifespan of the parent permission, significant works were also undertaken by our Client to ensure the lands in Sectors 6 and 9 are fully serviced with the enabling infrastructure being constructed at varying stages since 2006, as follows;

- i. Marlbog Road was widened and public paths / cycle tracks constructed in 2006 from Haggardstown Cross to the new roundabout at the western end of Marlbog Road.
- ii. New foul drainage works were completed within Marlmount including new 225mm sewer connections to the existing foul sewer in Marlbog Road.
- iii. The widening of Marlbog Road also included the provision of 525mm / 600mm surface water outfall drainage for the entire Marlmount Housing Estate, as well as construction of surface water attenuation measures.
- iv. A new 150mm watermain was also constructed in Marlbog Road to serve the Marlmount Housing Estate which has also been extended with connections available to facilitate construction of 80 no. additional dwellings, as permitted under Reg. Ref. 19/804 and Reg. Ref. 20/856.

Having regard to the extent of works completed to date, we note that the subject lands accord with the definition of brownfield / infill sites which are excluded from the phasing approach set out in Variation No. 1, as stated in Policy CS1:

“To promote sustainable development on brownfield / infill sites by excluding such sites from the requirement to comply with the phasing strategy throughout the Plan Area.”

With respect to the identification of brownfield / infill sites, Section 5.7 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009) defines 'Brownfield Sites' as:

“any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces”.

Furthermore, Section 2.5 of Variation No. 1 indicates that:

“Infill sites range from small gap infill, unused or derelict land and backland areas up to larger residential sites or adjacent sites that are all in different ownerships. The development of infill sites has the potential to revitalise areas by utilising the capacity of existing social and physical infrastructure.”

Having regard to the definition of 'brownfield sites' in the 2009 Guidelines and 'infill sites' in Section 2.5 of Variation No. 1, it is our view that the subject land satisfies both these definitions, given the extent of works completed to date, and the substantial investment made by our Client to provide essential services and enabling infrastructure in this location.

Figure 6 shows the status of development within Sectors 6 and 9 which is bordered by existing residential development to the north at Chapel Road and to the south at Marlbog Road.

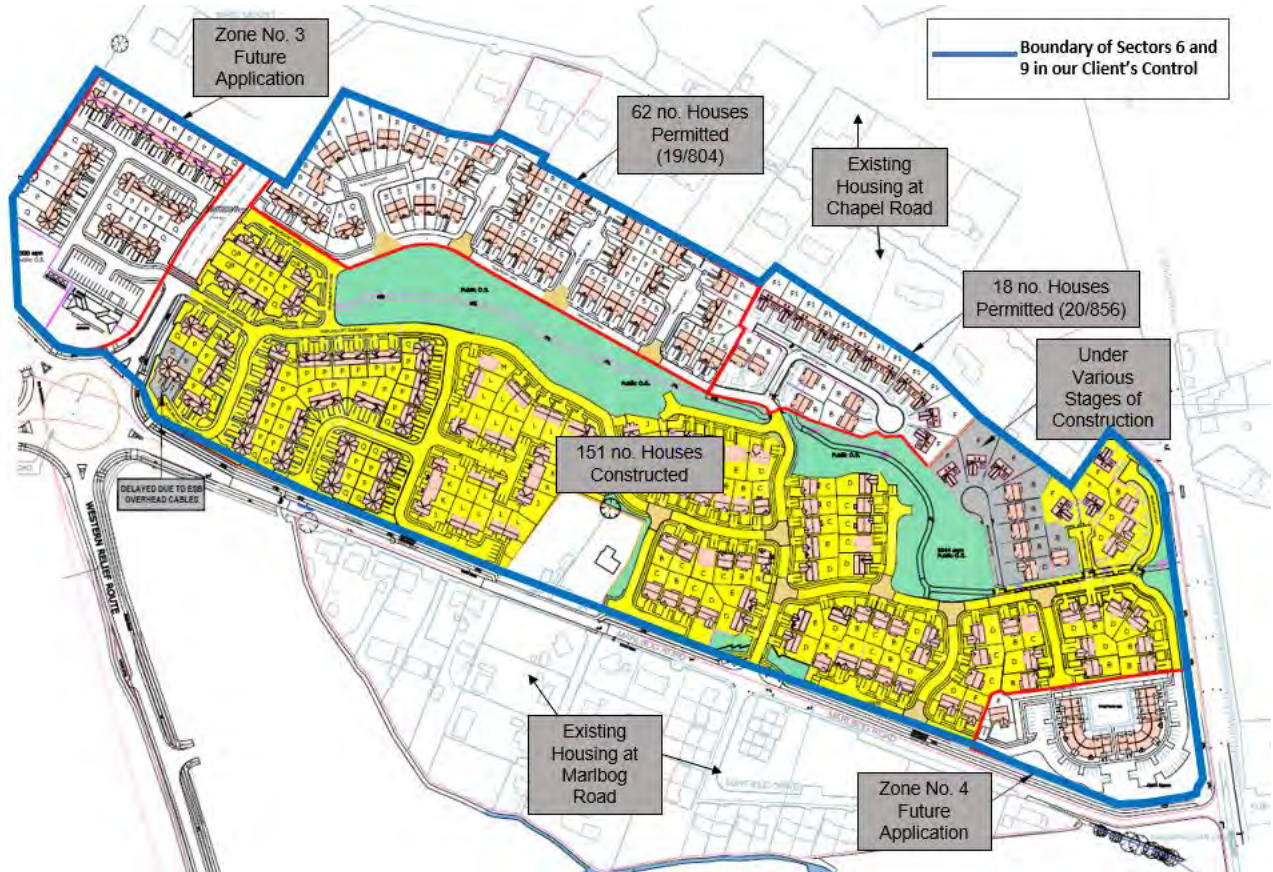


FIGURE 6 SURROUNDING CONTEXT & CURRENT DEVELOPMENT STATUS ON SUBJECT LAND

4. Draft Louth County Development Plan 2021-2027

4.1 Status of Dundalk as a Regional Growth Centre

The Draft Louth County Development Plan acknowledges the growing strategic importance of the Dundalk settlement arising from recent statutory policy changes at national and regional level which designate Dundalk as a Regional Growth Centre;

*“This Draft Plan represents a step change from the current Louth County Development Plan 2015-2021, for a number of reasons, which relate primarily to **changes enacted at national and regional level and legislative amendments**. The cumulative impact of the principal changes **has a major impact on this Draft County Development Plan and none so profoundly as to the recognition afforded to the towns of Drogheda and Dundalk therein.**” (emp. added)*

Accordingly, the Draft Plan prioritises growth in Dundalk as a Regional Growth Centre in acknowledgement of its capacity to develop as a city of scale and deliver national and regional economic growth, investment and prosperity. Aligned with the RSES, the Draft Development Plan seeks to promote the continued sustainable and compact growth of Dundalk with a target population of 50,000 by 2031.

Notably, the strategic vision for the entire County is underpinned by the aim of promoting the Regional Growth Centres, including Dundalk;

“Promote County Louth, in particularly the Regional Growth Centres of Drogheda and Dundalk, as uniquely attractive places in which to live, work, visit, and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are to the highest standards. “

This vision is to be achieved through a series of strategic objectives. Of particular relevance to this submission are the following;

- **SO 1:** Realise the potential and promote the development and growth of County Louth through harnessing the economic and employment potential of the competitive advantages of the County. This includes its strategic location, connectivity and accessibility to external markets and having regard in particular to the role of Drogheda and Dundalk as Regional Growth Centres located on the Dublin-Belfast Economic Corridor.
- **SO 2:** Support and promote the role of Drogheda and Dundalk as key designated Regional Growth Centres with high levels of self-sustaining employment and services, to act as regional economic drivers, playing a significant role for a wide catchment area and to help achieve a more coordinated and sustainable settlement and travel pattern across the region.
- **SO 3:** Direct new development in accordance with the Core and Settlement Strategies, which will provide for the sustainable development of the County for the period 2021-2027 and beyond and in accordance with the principles of compact growth, consolidation and regeneration.

4.2 Core Strategy and Housing Need

We consider preparation of the core strategy in line with Section 10 of the Planning and Development Act 2000, as amended, as the most significant element of the development plan making process.

Consistent with the objectives of the Regional Spatial and Economic Strategy, the Draft Plan seeks to focus population and economic growth in Drogheda and Dundalk, within the footprint of existing built-up areas. Together with Drogheda, Dundalk is identified in Table 2.4 in the Core Strategy as having Level 1 settlement status, an extract of which is provided in **Table 1**.

Settlement Level	Settlement Category	Description	Settlement
1	Regional Growth Centre	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.	Drogheda Dundalk

TABLE 1 EXTRACT FROM TABLE 2.4 SETTLEMENT HIERARCHY FOR COUNTY LOUTH

As set out in Table 2.7 of the Core Strategy, actual population change in Dundalk during the 2011-2016 intercensal period was 1,188 no. persons (3.1%). Table 2.9 includes projected population and distribution in County Louth which targets Dundalk for 36.3% of the County’s growth between 2021 to 2027, in line with its designation as a Regional Growth Centre.

Population increase in Dundalk from 2002 to 2016 was 6,499, being an annual average increase of 464 no. persons. Between 2016-2027, the annual average population increase in Dundalk is projected to be 696 no. persons (8,352 no. persons total). This is 50% above the annual average growth from 2002-2016 and the highest of all settlements within the County.

To facilitate this level of forecast population growth, Table 2.14 in the Core Strategy identifies a requirement for 2,606 no. additional housing units within the settlement during the period of the Draft Plan. This represents 31.5% of the total projected housing requirement for County Louth, reflecting its considerable capacity to deliver the housing and employment targets set out in both the RSES and the NPF.

In this context however, we would highlight that the population projections set out in the NPF and RSES which have informed preparation of the draft Plan are based on projections derived from 2011 and 2016 census data which have proven conservative and out of alignment with more recent CSO projections.

Since 2016, the net national migration figures were 19,800 (2017), 34,000 (2018) and 33,700 (2019). The latest data published by the CSO in August 2020 indicates that net inward migration was 28,900 persons nationally.¹ Although there has been a recent slight decrease in inward migration which will have been impacted by the COVID-19 pandemic, this figure reflects a sustained high level of inward migration that is significantly greater than the assumed figure of 8,000 per annum (based on 2011 to 2016 census data) which informed the NPF population projections to 2021. Thus, in reality, the levels of net inward migration have been three to four times greater than forecast over the period to 2020. If the in-migration figures return to pre-COVID-19 levels in late 2021/early 2022, then this disparity will be exacerbated by the continued undersupply of new homes and further compound the housing crisis.

This view is endorsed in the Central Bank of Ireland publication *Population Change and Housing Demand in Ireland*. It examines the most up-to-date population projections from the CSO and estimates scenarios for long-run housing demand in Ireland, advising that around 34,000 no. homes would be required per year until the end of the next decade. Drawing on CSO population data from 2016-2019, the report states;

“Beyond 2027, the projected level of housing demand in the NPF is lower than the estimate in our high migration scenario. This is mainly explained by the lower net migration assumption in the NPF estimates. The NPF population projections assume net inward migration of 12,500 per annum compared to 30,000 per annum in the high migration scenario.”²

¹ Source: <https://www.cso.ie/en/releasesandpublications/er/pme/populationandmigrationestimatesapril2020/>

² Central Bank of Ireland, Economic Letter, *Population Change and Housing Demand in Ireland*, Thomas Conefrey and David Staunton. Vol. 2019, No. 14.

The report concludes;

“In all scenarios we examine, estimated housing demand is higher than the number of new residential units completed over recent years, implying a need for continued expansion in housing supply over the medium-term.”³

Census data for the five year period from 2011 to 2016, shows that the population of County Louth increased its population by 5,987 (4.9%) from 122,897 to 128,884. However, CSO New Dwelling Completions data indicates that during the intercensal period the number of new dwelling completions in Co. Louth was only 916. Based on an average household size of 2.76⁴ persons in County Louth in 2016, this indicates that about 2,169 no. new homes were needed in the period to cater to population growth in the county, thereby representing a shortfall of 1,253 no. dwellings.

While there are variations between the NPF/RSES growth projections and the information published by the CSO, what is clear, is that the population of Ireland will grow substantially. Population growth coupled with the existing pent-up demand in housing requires an effective policy response.

4.3 Proposed Zoning under Draft County Development Plan

To implement the growth targets for Dundalk and facilitate delivery of much needed Pleanáil housing in the period to 2027, the Draft Plan provides for removal of the Phase 2 designation on our Client’s lands. In this regard, the land is proposed to be rezoned from ‘Residential 1’ (Phase 2) to ‘A1 Existing Residential’ under the Draft Plan, see **Figure 7**.

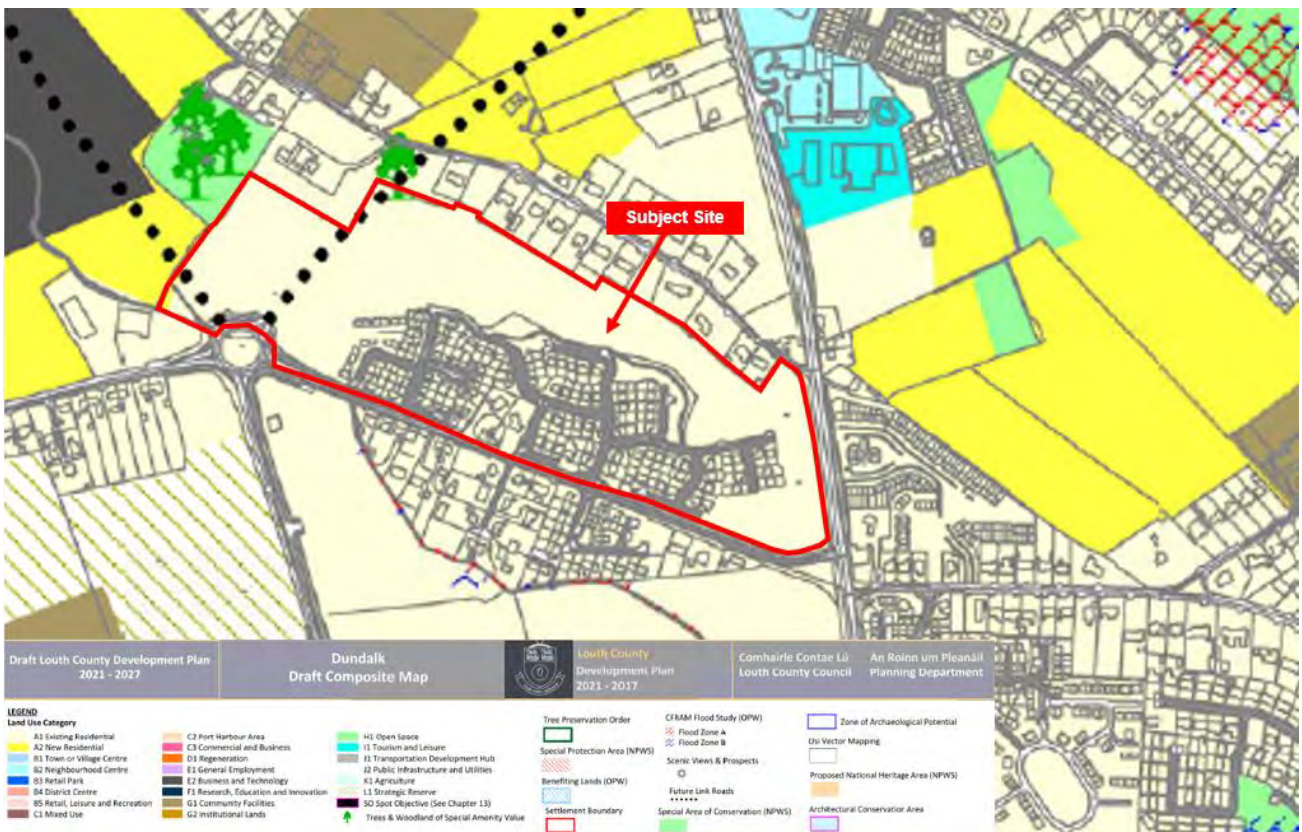


FIGURE 7 EXTRACT FROM DUNDALK DRAFT COMPOSITE MAP

The ‘A1 Existing Residential’ zoning objective is *“To protect and enhance the amenity and character of existing residential communities.”*

³ *ibid.*

⁴ Louth County Council, *Draft Louth County Development Plan 2021-2027*, Table 2.11: Average Occupancy Rate 2016, p2-22.

It is considered that the rezoning of the subject land has been proposed in recognition of the fact that this site is within an established residential area, with a significant number of existing houses fully completed (151 no.) and therefore reflects the County Council's support for its continued development.

The proposed zoning of these lands is also deemed appropriate, given they are contiguous to established residential development, including Chapel Road to the north, Marllog Road to the south and the established area of Blackrock to the east.

The proposed rezoning will facilitate further residential development on these lands consistent with national and regional strategic objectives to target growth in the region, further articulated in the following policy objective of the draft Plan;

“CS 6 - Direct and consolidate the majority of the County’s future population growth into the strong and dynamic Regional Growth Centres of Drogheda and Dundalk in line with the objectives of the Regional Spatial and Economic Strategy and in accordance with the Core and Settlement Strategies of the Development Plan.”

Rezoning of the subject land in accordance with the draft County Development Plan will therefore enable our Client to contribute to the effective delivery of much needed new housing, to enable the settlement to fulfil its potential as a Regional Growth Centre.

The growth strategy for Dundalk is predicated on the locational advantage of the settlement along the Dublin-Belfast Economic Corridor and its strong employment base. Dundalk is the main centre of employment in the County, with almost 14,200 no. jobs in 2016. As detailed in Section 5.2 of the draft Development Plan, Dundalk boasts a high job to workforce ratio of 0.99 (2016). The anticipated levels of population growth and capacity to attract continued economic development and job creation will rely on increased housing supply, ensuring that people can live close to where they work.

The support of the County Council in bringing forward appropriately located and services lands for development, as is the case with our Client’s lands, will increase the supply of new homes, thereby sustaining future population growth and building critical mass to support the delivery of new infrastructure and attract further investment.

Having regard to the existing pattern of development on the subject site and adjoining lands, as well as the status of Dundalk as a Regional Growth Centre, our Client supports the proposed zoning of their lands under the draft County Development Plan and welcomes the approach of the County Council in promoting its future development.

4.4 Density

As set out above, our Client supports the proposed rezoning of their site to ‘A1 Existing Residential’ under the draft Louth County Development Plan 2021-2027. In line with the NPF and recent Section 28 Ministerial Guidelines, the draft Plan also promotes compact growth by providing for higher densities in central urban locations that benefit from high levels of accessibility to public transport.

In line with this approach, our Client notes the recommended densities in the draft Plan, reproduced in **Table 2** below.

Settlement Category	Recommended Minimum Density per Hectare	
	Town Centre	Edge of Settlement
Regional Growth Centres Dundalk and Drogheda	50	35
Self-Sustaining Growth Town Ardee and Dunleer	35	25

TABLE 2 RECOMMENDED DENSITIES (SOURCE: TABLE 3.2 OF DRAFT LCDP 2021-2027)

In accordance with the draft Plan, 35 units per hectare (uph) would be the recommended minimum standard for density on our Client's lands, given its location as an edge of settlement site in Dundalk. We would highlight that the appropriate residential density should also be determined having regard to the locational characteristics of the site and existing pattern of development.

In this regard, Section 3.11 of the draft Plan rightly acknowledges that the potential density of a site should be guided by *"the surrounding context and how the development would relate to the existing built form and character of its location."* It recognises that the objective to achieve higher densities will take account of the capacity of the lands to accommodate this type of development, the location of the lands and public transport accessibility.

It is our view that higher densities and in particular, apartment development is not appropriate at this location. Section 13.9.26 of the draft Plan identifies appropriate locations for apartments as *"central urban areas within a reasonable walking distance (up to 15 minutes) of town centres, public transport, or employment areas."* Our Client supports this position on the basis that the Marlmount Housing Estate is not located centrally within the urban area of Dundalk. Although the site benefits from its proximity to the surrounding road network, it is 3.5km south of Dundalk Town Centre (c.40 minutes walking distance) which is also the location of the Dundalk Train Station and centre of economic and employment activity.

Having regard for the above conditions, higher density development that includes apartments is not viable at this location and would inhibit the future delivery of affordable housing within the Marlmount Estate.

Our Client therefore endorses a flexible approach to density, particularly for edge of settlement locations and infill sites, that would ensure future development delivers sustainable communities having regard to the established residential setting in which they are located. Such an approach would safeguard the amenities of the existing residential community in these locations, ensure future development on these lands is integrated appropriately with existing dwellings and support the delivery of suitable, affordable dwellings to meet housing demand.

It is our view that future housing development on our Client's lands that is consistent with the existing density at this location will achieve the overarching objectives to achieve compact growth by consolidating the existing built up footprint of Dundalk and provide much needed new homes on an infill site.

In line with the above, we recommend a specific objective regarding density be included within the draft Louth County Development Plan 2021-2027, as follows;

"To promote sustainable development, a range of densities appropriate to the scale of settlement, site location, existing built form, accessibility to public transport and community facilities will be encouraged."

5. Conclusion and Recommendations

Our Client is an Irish developer, with a proven track record of delivering high-quality new homes and is committed to working with the County Council to deliver much-needed housing. This commitment has already been demonstrated through the delivery of 151 no. houses, together with the associated infrastructure necessary to provide high-quality amenities, to respond to the existing housing shortage in the settlement of Dundalk.

As detailed in this submission, our Client is building on the existing housing stock in the Marlmount Housing Estate by advancing plans for further residential development on the subject lands, having recently secured permission for an additional 80 no. dwellings with supporting infrastructure and amenities.

Our Client's site has the capacity to make a significant contribution to the provision of new residential stock in a highly accessible location along the Dublin-Belfast Economic Corridor, well served by the national and regional road network, public transport, employment opportunities and social infrastructure. Additional housing supply will enable further population growth in this Regional Growth Centre, building critical mass that will attract further investment in infrastructure and drive sustainable growth in the region.

The Draft Louth County Development Plan is therefore welcomed by our Client. The proposed 'A1 Existing Residential' zoning will ensure that these strategically located and serviced lands will be available to facilitate the growing population of Dundalk, in a manner consistent with its elevated status as a Regional Growth Centre. Further residential development on these lands will also consolidate the existing built up footprint of the Dundalk settlement in accordance with national and regional planning policies that promote compact growth.

Our Client is ready and committed to deliver housing on these lands and supports the position of the County Council to bring forward this site from 'Residential 1' (Phase 2) to 'A1 Existing Residential'. This decision will help realise housing allocation targets for residential zoned lands in Dundalk and will contribute to the housing output targets set out in Rebuilding Ireland (2016).

For the reasons set out in this submission, our Client supports the proposed rezoning of their site to 'A1 Existing Residential' under the draft Louth County Development Plan 2021-2027. Further, our Client endorses a flexible approach to the applicable density standards that have regard to the site characteristics and established residential setting, particularly on infill sites. Such an approach would ensure delivery of new homes in a manner consistent with the existing pattern of development and increase the supply of suitable, affordable accommodation for families in the Marlmount Housing Estate.

It is our view that higher densities and in particular, apartment development is not appropriate at this location. As detailed in the draft Plan, apartments are appropriately located in "*central urban areas within a reasonable walking distance (up to 15 minutes) of town centres, public transport, or employment areas.*" On this basis, we would highlight that higher density development that includes apartments is not viable at this location and would inhibit the delivery of affordable housing within the Marlmount Estate.

As set out in the body of this report, it is our view that future housing development on our Client's lands consistent with the density of existing development and the surrounding context will achieve the strategic objective of compact growth by consolidating the existing built up footprint of Dundalk and provide much needed new homes on an infill site.

To support the creation of sustainable communities and promote appropriate densities that are responsive to the established character of existing residential areas, we recommend a specific objective regarding density be included within the draft Louth County Development Plan 2021-2027, as follows;

"To promote sustainable development, a range of densities appropriate to the scale of settlement, site location, existing built form, accessibility to public transport and community facilities will be encouraged."

On behalf of our Client, McGarrell Reilly Group, we thank you for the opportunity to make a submission to the Draft Louth County Development Plan 2021-2027 and trust that a positive outcome will be forthcoming in due course. The proposed zoning of the subject lands will ensure the continued delivery of housing in the Regional Growth Centre of Dundalk and our Client looks forward to further progressing high quality residential development in this strategic location.

Please do not hesitate to contact the undersigned should you wish to discuss any aspect of this submission.

Martina Keenan Rivero

McCutcheon Halley Chartered Planning Consultants