



PLANNING SUBMISSION

LANDS AT
HAYNESTOWN,
DUNDALK, CO
LOUTH



PLANNING SUBMISSION

Louth County Development Plan 2021-2027

PREPARED BY:

Genesis Planning
Planning and Urban Design

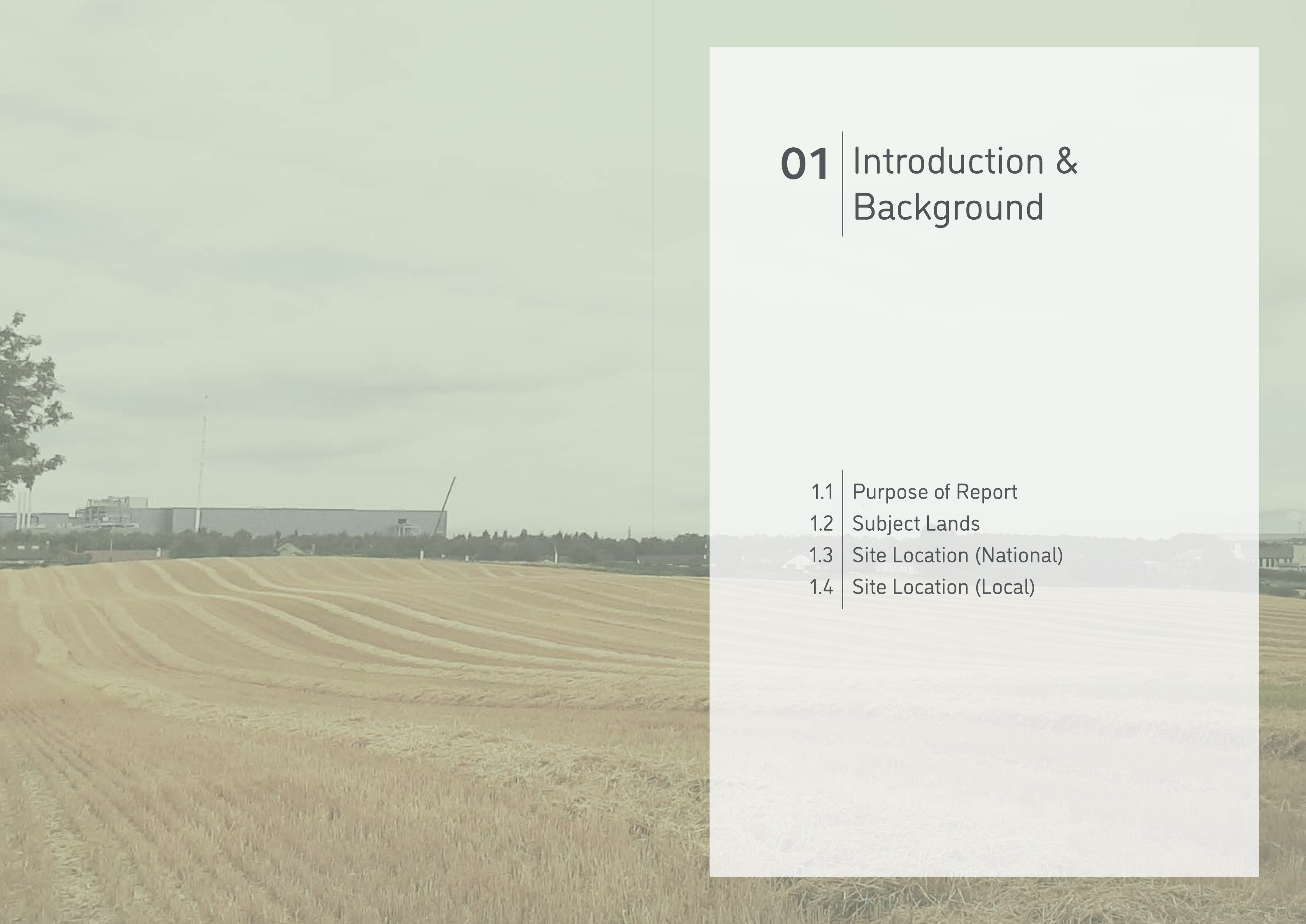
ON BEHALF OF:

James Loughran



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01 | Introduction & Background

- 1.1 | Purpose of Report
- 1.2 | Subject Lands
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01 Introduction & Background

1.1 Purpose of Report

- 1.1.1 The Planning Authority is commencing the preparation of the County Development Plan (CDP) for the county to cover the period 2021 to 2027. The purpose of the CDP is to set out an overall strategy for the proper planning and sustainable development of the county.
- 1.1.2 Genesis Planning have been engaged by BL Enterprises Ltd to examine and assess the existing policy context in Dundalk and to prepare this submission to the Planning Authority on their behalf.
- 1.1.3 In terms of background our client is in ownership of the subject lands in the Haynestown area of Dundalk, and is currently preparing a SHD application to deliver 315 residential units and creche on the lands.
- 1.1.4 In preparing this submission we have undertaken an analysis of our client's lands in the context of the National Planning Framework, the RSES, the current Louth CDP 2015-2021 and the Dundalk and Environs Development Plan (2009-2015).
- 1.1.5 The analysis undertaken by Genesis Planning demonstrates that the subject lands are suitable for residential development.

1.2 Subject Lands

- 1.2.1 In totality the subject lands occupy approximately 11.5ha of land along Marlbog Road (L3167) in the Haynestown Area of Dundalk, approximately 5km south of Dundalk Town Centre.
- 1.2.2 We submit the subject site would provide a suitable location for a residential development.
- 1.2.3 This submission outlines the planning rationale for the subject lands to be included as zoned residential in the forthcoming Louth CDP.



Location of Subject Site

01 Introduction & Background

1.3 Site Location: National

1.3.1 The site is located within the gateway town of Dundalk - the third largest town in the state after Drogheda and Swords (CSO 2016). In terms of zoning the site is located at the southern environs of the town on currently zoned lands that permit residential development.

1.3.2 In terms of local demographic context, Dundalk has a population of circa 40,000 and is an economic hub for the north-eastern region.

1.3.3 In terms of the socio-economic context, there are a large number of multi-national companies across a wide range of sectors and in conjunction with the economic growth of the town, there has been a steady increase in the local population over the past couple of decades.

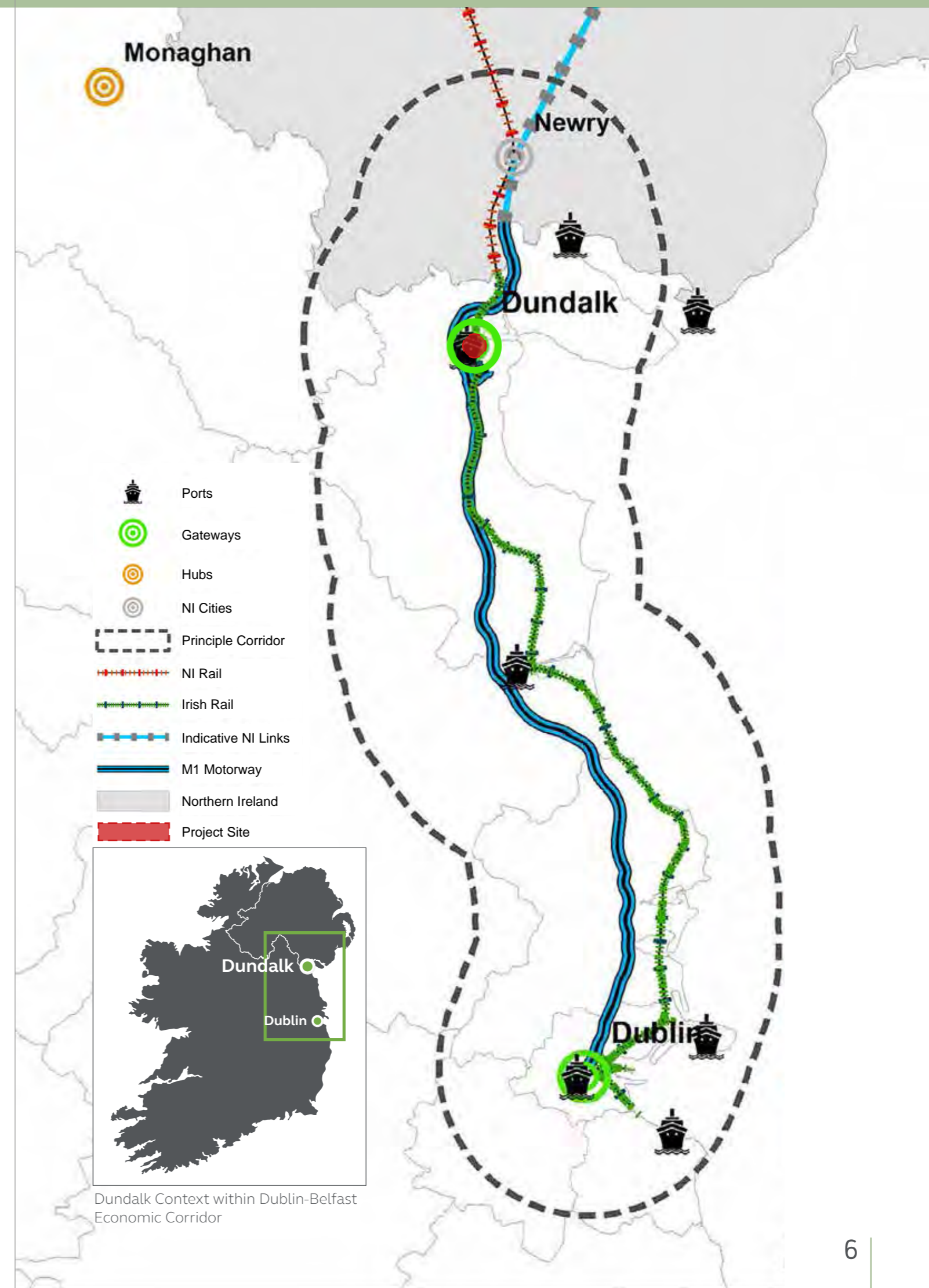
1.3.4 As the Planning Authority will note under the NPF Dundalk is prioritised as a cross-border network settlement and is targeted for growth and investment. In respect of the Dublin-Belfast economic corridor, the NPF also seeks to develop this area in a balanced manner between employment and residential.

1.3.5 In this context the provision of appropriate residential accommodation in the right location is critical to maintaining Dundalk's competitiveness and attracting further growth in investment and jobs.

1.3.6 Therefore given the proximate location of the site to areas zoned for employment purposes, the subject lands provide an ideal location for residential development.



Dundalk is recognised in the RSES2018 as a regional growth centre and a regional driver



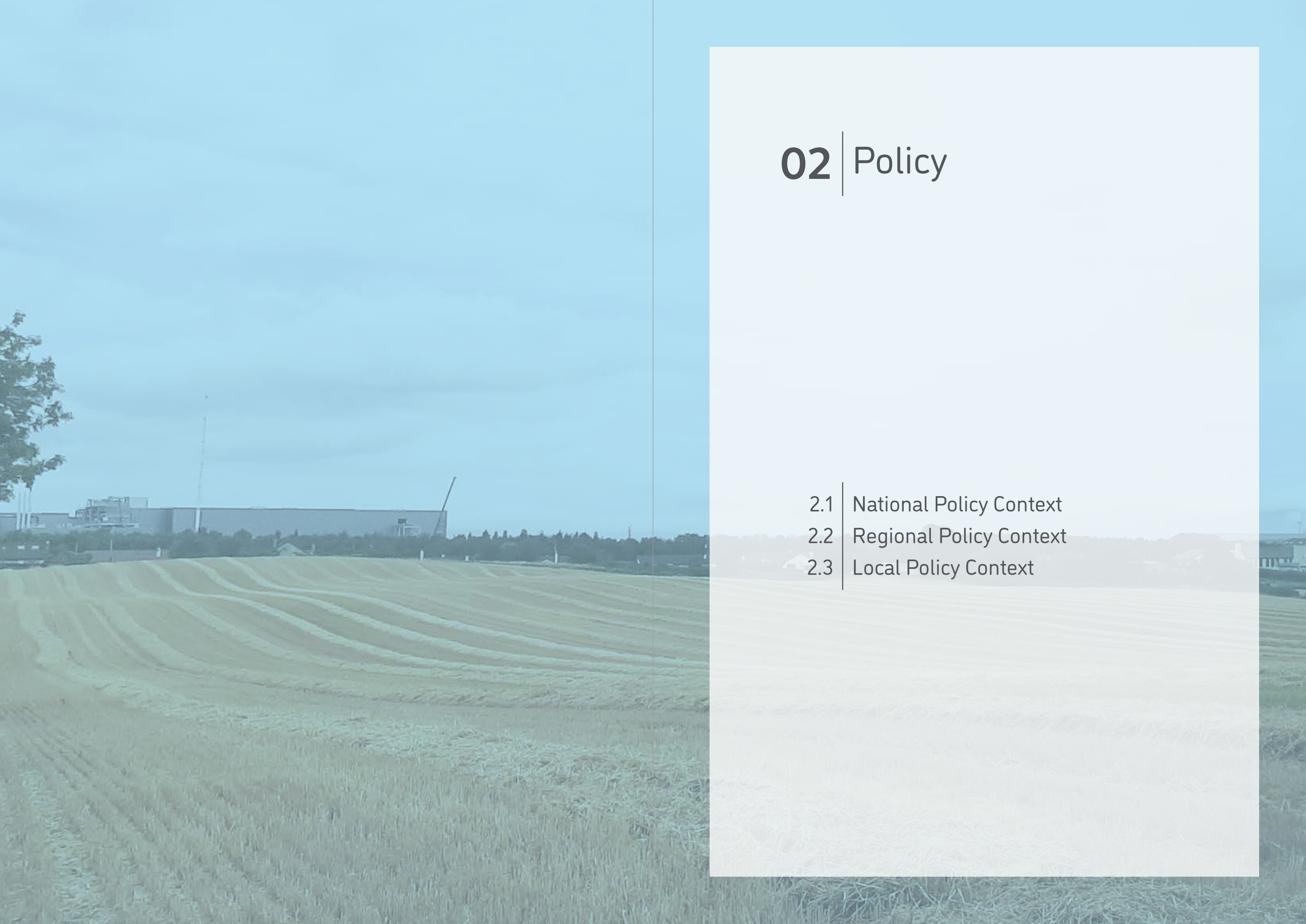
Dundalk Context within Dublin-Belfast Economic Corridor

01 Introduction & Background

1.4 Site Location: Local

- 1.4.1 In terms of the locality, the site is located in close proximity to both Blackrock and the south Dundalk employment expansion areas, with IDA lands, Xerox, Finnabair Business Park and DKIT all within 2km.
- 1.4.2 Being accessed via the Marlbog Road (L3167), the site is highly accessible by foot, bicycle and car.
- 1.4.3 A continuous footpath and cycle routes (on-street) also connects the site via Dublin Road to the town centre and to nearby leisure and community facilities in both Blackrock and the wider Haynestown area.
- 1.4.4 Immediately adjacent to the site boundary is the Geraldines GAC gaelic football grounds (McGeough Park), as well as St. Furseys National School, Haggardstown.
- 1.4.5 We also note there are a number of environmental designations located to the east of the subject lands associated with the nearby coastline including:
 - Dundalk Bay SAC
 - Dundalk Bay SPA
 - Carlingford Mountain SAC
 - Stabannan-Braganstown SPA
- 1.4.6 Going forward direct access can be provided to service the lands from the L3167 for a residential development.



A landscape photograph showing a field in the foreground, a building in the middle ground, and a blue sky with light clouds in the background. The field has distinct rows, possibly from a plow or harrow. The building is a long, low structure with a chimney or tower on the left side. The sky is a clear, pale blue.

02 | Policy

- 2.1 | National Policy Context
- 2.2 | Regional Policy Context
- 2.3 | Local Policy Context

2.1 National Policy Context

2.1.1 The National Planning Framework 2040 sets out the importance of development within existing urban areas, and sets out strategic objectives which Planning Authorities are to have regard to.

2.1.2 Under the NPF Dundalk is recognised as a regional growth centre in the context of the Dublin-Belfast corridor, and being of importance due to its links with Drogheda and Newry. Dundalk is to be targeted for growth and investment as a key driver for the border region.

2.2.3 Key policies of the NPF in this regard include ‘a focused approach to compact, sequential and sustainable development of the larger urban areas along the Dublin-Belfast economic and transport corridor, along which there are settlements with significant populations such as Dundalk and Drogheda.’ (p. 35)

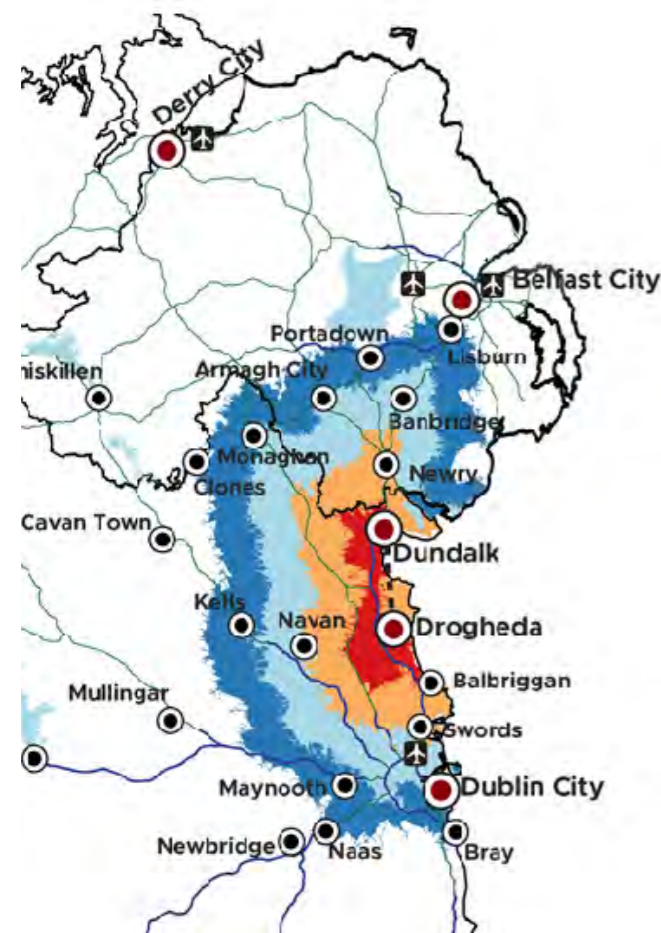
2.1.4 Furthermore, we highlight a number of objectives contained within the NPF which specifically refer to Dundalk such as:

- **Objective 2b** ‘The regional roles of... Drogheda-Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy.’
- **Objective 3a** ‘To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements.’
- **Objective 3b** ‘Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.’
- **Objective 4** states to ‘ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well being.’
- **Objective 5** ‘To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity.’
- **Objective 6** ‘Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.’

- **Objective 7** ‘Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:
 - » Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the... Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;
 - » Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities’; and
 - » ‘Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth.’
 - » In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.’
- **Objective 11** ‘In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.’
- **Objective 13** states ‘In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.’
- **Objective 35** states ‘Increase residential density in settlements through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.’
- **Objective 44** states ‘In co-operation with relevant Departments in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility.’



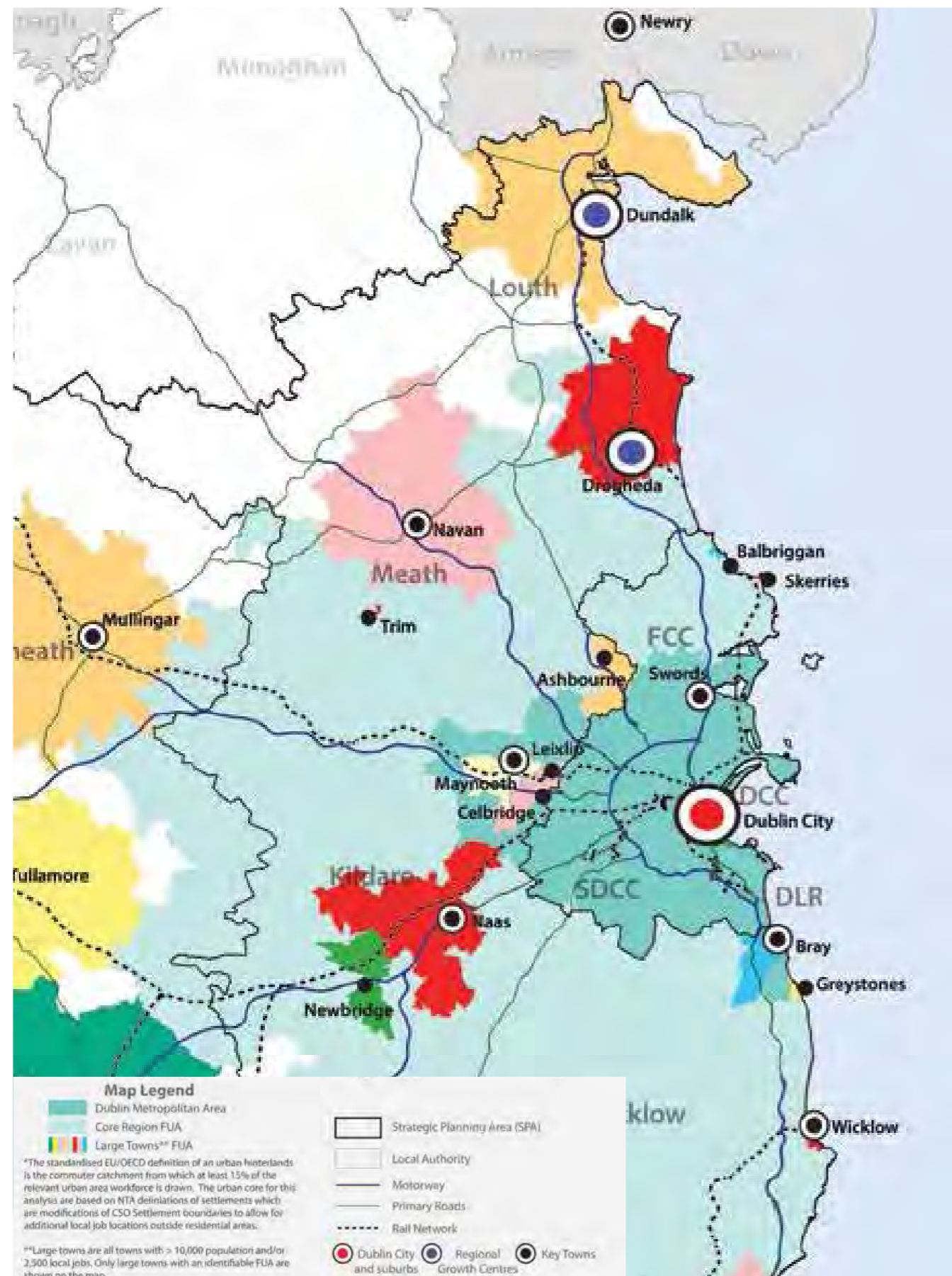
Extract from NPF relating to the Dublin to Belfast Eastern Economic Corridor



Summary

We submit that the proposal in the regional growth centre of Dundalk is wholly consistent with the strategy and objectives as set out in the NPF. Specifically:

- The subject lands are serviceable, which under the tiered approach set out in the NPF should be prioritized under the development plan process.
- Objectives 2b, 3a, 3b, 4, 5, 6, 7, 11, 13, 35 & 44 of the NPF are complied with.
- Lands represent infill and consolidation of the urban area as they are within the settlement boundary of Dundalk.
- The lands are in close proximity to a number of significant employment centres.
- The subject lands are sequentially acceptable (see section 3.3 for further details).



Extract from RSES for EMRA relating to the Functional Urban Areas and Large Towns CSO 2016

2.2 Regional Policy Context

2.2.1 The RSES for the Eastern and Midland Region (EMRA) sets out the strategic plan and investment framework aimed to 'shape future development and to better manage regional planning and economic development throughout the Region.'

2.2.2 In line with the NPF, Dundalk is recognised by the Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES2018) as a regional growth centre and a regional driver.

2.2.3 The policy for the Dublin-Belfast corridor encourages focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale, with Dundalk having been identified for significant population growth to achieve a population in the region of 50,000 by 2031.

2.2.4 In this context Dundalk is also identified as one of the key settlements that is critical to the success of both the RSES and NPF. It is recognised by the RSES that regional drivers:

'will accommodate significant new investment in housing, transport and employment generating activity. They are important self-sustaining centres that act as economic drivers for the Region, capitalising on their strategic location and high-quality connections to Dublin, while also servicing and supporting a wider local economy, which extends beyond the Region in the case of Athlone and cross border in the case of Dundalk.'

2.2.5 In terms of the development strategy outlined in the RSES, it echoes the NPF in that it states:

'Facilitating housing is paramount to ensuring the sustainability, vitality and viability of the rural places of the Region. Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth.'

- 'A significant proportion of future urban development should be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.'

- RPO 3.3:** Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas.'

- RPO 4.78:** Development plans should support the development of a 'New Homes in Small Towns and Villages' initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.

- RPO 4.83:** Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.

Summary

As the subject lands are strategically positioned within the settlement boundary of Dundalk, the zoning of the subject lands for residential development in the forthcoming Louth CDP is consistent with the objectives set down by the RSES. Specifically the zoning of the subject lands will improve the supply of residential units for Dundalk in a sustainable manner, being located directly adjacent to major employers in the town and facilitating compact growth through the consolidation of the urban area.

02 Context

2.3 Local Policy Context

2.3.1 The current Louth CDP sets out the strategic land use objectives and policies for the overall development of the county up to the year 2021, acting as a guide for those interested in pursuing development and to inform development proposals.

2.3.2 In terms of settlement hierarchy, under the current CDP Dundalk has been identified as a Level 1 – Large Growth Town, specifically it states:

'It is projected that it [Dundalk] will grow to 46,622 during the lifetime of this Development Plan, to a level where it can support a wide range of services and facilities that will provide higher levels of economic activity, growth and development.'

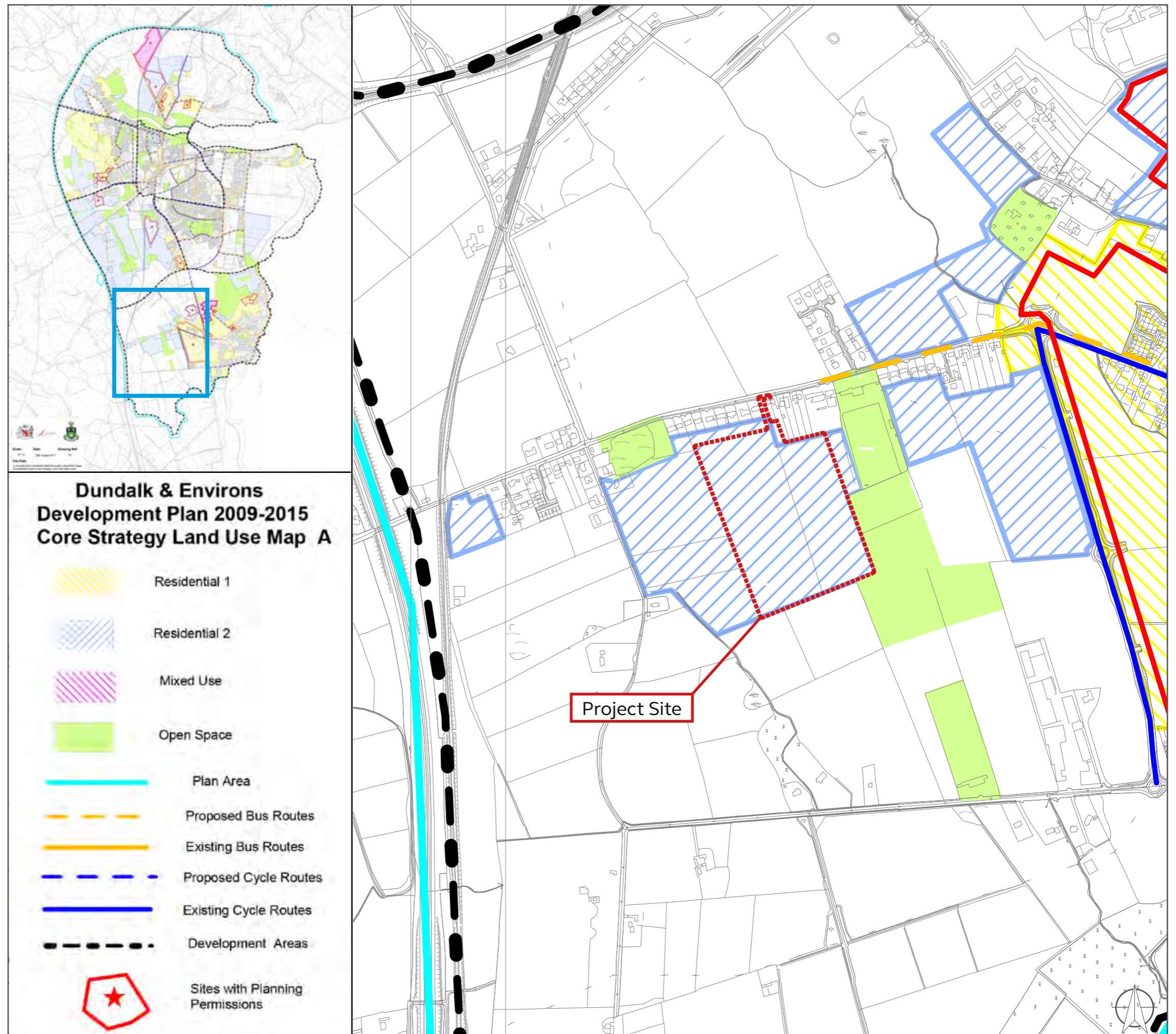
2.3.3 In terms of zoning, the provisions contained within the CDP accord with the Dundalk and Environs Development Plan (2009-2015; as extended). The subject lands are designated in the DEDP 2009-2015 as "Residential 2". The zoning objectives are as set out in the LCDP are:


'To protect and improve existing residential amenities and to provide for infill and new residential developments.'

'To provide for new residential communities and supporting community facilities subject to the availability of services.'

Summary

The development of the subject site for residential development is consistent with the zoning objectives as set out both in the Louth County Development Plan 2015-2021 and the Dundalk & Environs Development Plan 2009-2015. We submit the subject lands are suitable for residential development and should be zoned accordingly in the upcoming CDP.





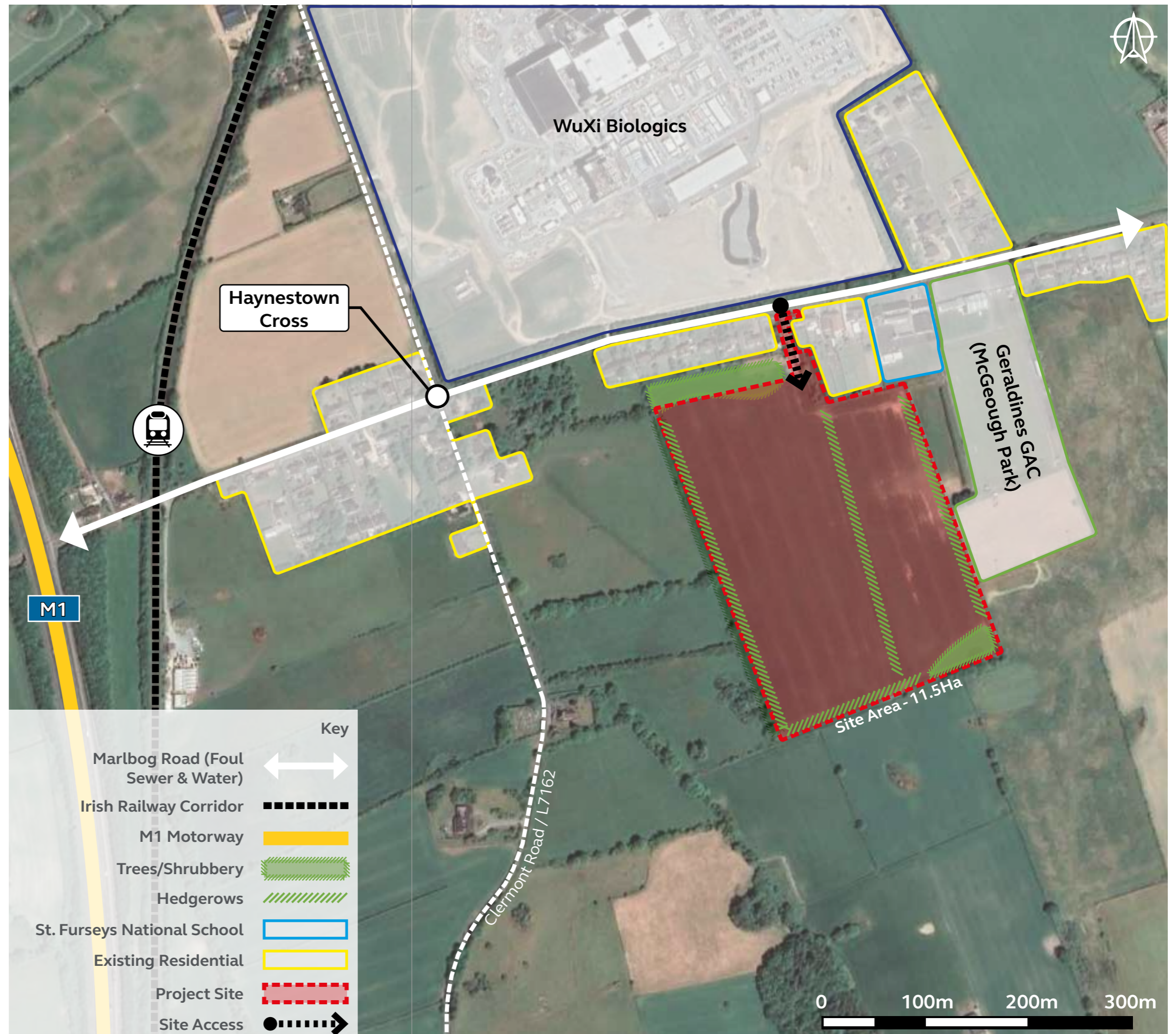
03 | Local Context & Concept

- 3.1 Site Context
- 3.2 Local Connections
- 3.3 Sequential Development
- 3.4 Residential Zoning
- 3.5 Concept Design & Delivery
- 3.6 Phasing & Delivery
- 3.7 SHD Proposals
- 3.8 Proposed Zoning
- 3.9 Recommended Zoning
- 3.10 Proposed Zoning & Context

03 Local Context & Concept

3.1 Site Context

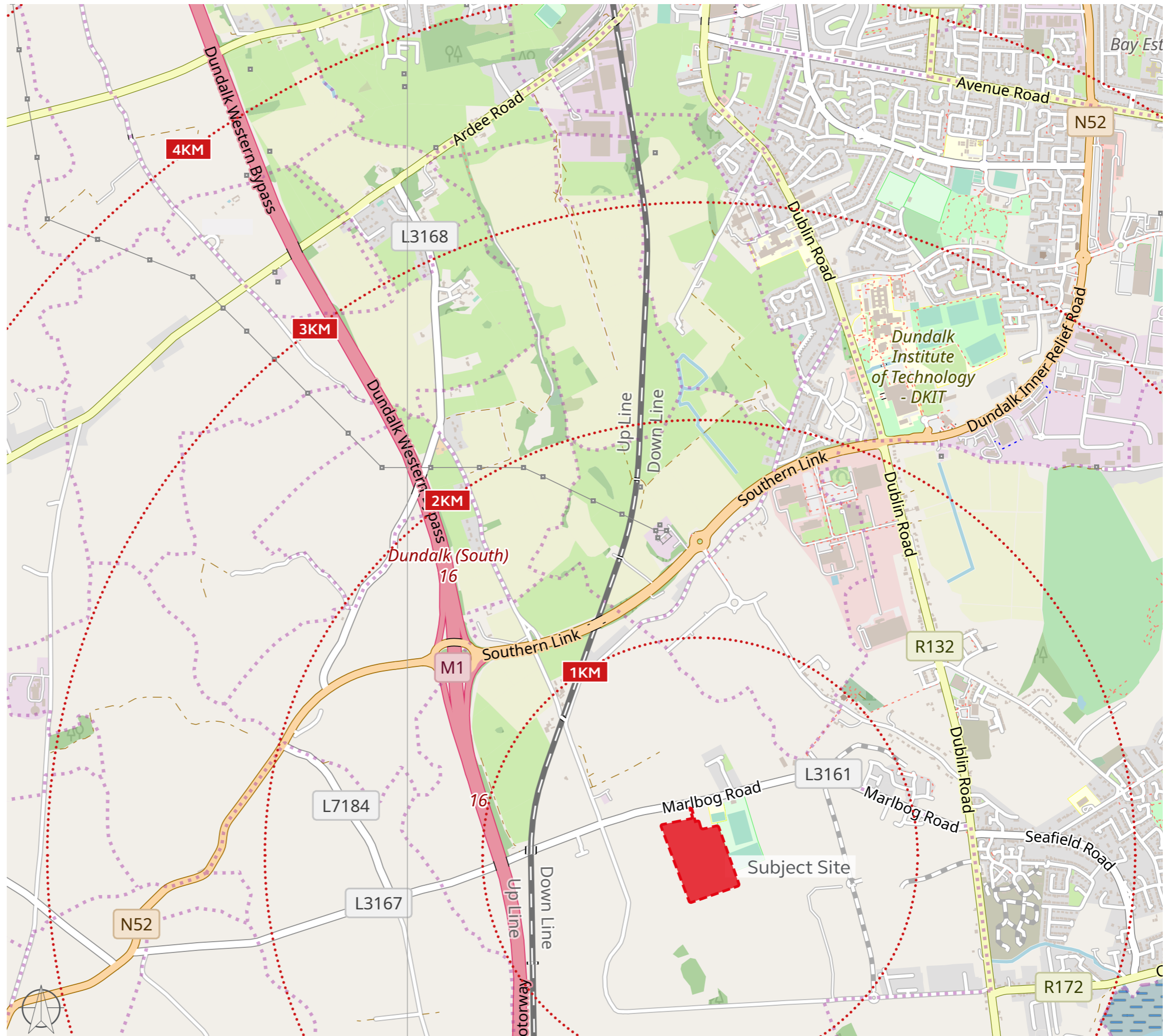
- 3.1.1 The subject site is located south of Marlbog Road in the Haynestown area south of Dundalk Town Centre, in close proximity to the M1 national route and Irish Rail Corridor.
- 3.1.2 In terms of the site itself, the site area comprises a greenfield parcel of lands measuring a total 11.5 hectares bordering Geraldines Gaelic Athletic Club along part of its eastern boundary, St. Furseys National School to the north-east, and existing residential uses along its northern boundary.
- 3.1.3 Of particular note is the presence of the significant WuXi Biologics Campus (previously IDA Ireland); a sizable biopharmaceutical campus estimated to employ around 400 people (talkofthetown.ie).
- 3.1.4 In respect of site features, access to the site already exists from Marlbog Road, located almost centrally along the northern boundary between existing residential properties. The site is readily servicable, with existing capacity to service the site.
- 3.1.5 The site itself is characterized by open and undulating grassland with mature hedgerows and trees along the perimeter. A small hedgerow bisects the site along its north south axis, with a small clustering of mature trees located in south-east corner of the site.
- 3.1.6 Views of the site are confined to the immediate stretches of Marlbog Road, Clermont Road (L7162) although restricted from adjacent residential properties as well the existing school (St. Furseys) and playing grounds (McGeough Park).
- 3.1.7 Overall the site benefits from it's proximate location relative to the Dublin Road, which is the fastest growing areas in Dundalk and the region for employment generation.



03 Local Context & Concept

3.2 Local Connections

- 3.2.1 The site is served by Marlbog Road (L3167) which runs east-west from the N52 to the Dublin Road (R132) near Earlsfort.
- 3.2.2 The site benefits from excellent road connections with access to the R132, N52 and M1 just over 1km away.
- 3.2.3 Existing cycle/footpaths also provide good connections to services in the local area, namely the R132 (Old) Dublin Road which is well serviced by public transport offering a 60minute bus service both to Dundalk Town Centre and Drogheda, with opportunity to continue onwards to Dublin.
- 3.2.4 On review we note the Haggardstown area in particular has seen an increased rate of economic developments. This follows the significant investment from a number of well-known multi-national companies in the locality, as well as higher level educational institutions (Dundalk Institute of Technology - DKIT) all within 2 to 3km of the subject lands.
- 3.2.5 In the context of local connections serving south Dundalk Environs, the subject lands are well placed in terms of local connections for a residential development



03 Local Context & Concept

3.3 Sequential Development

3.3.1 The merits of the sequential approach in land use planning are well established.

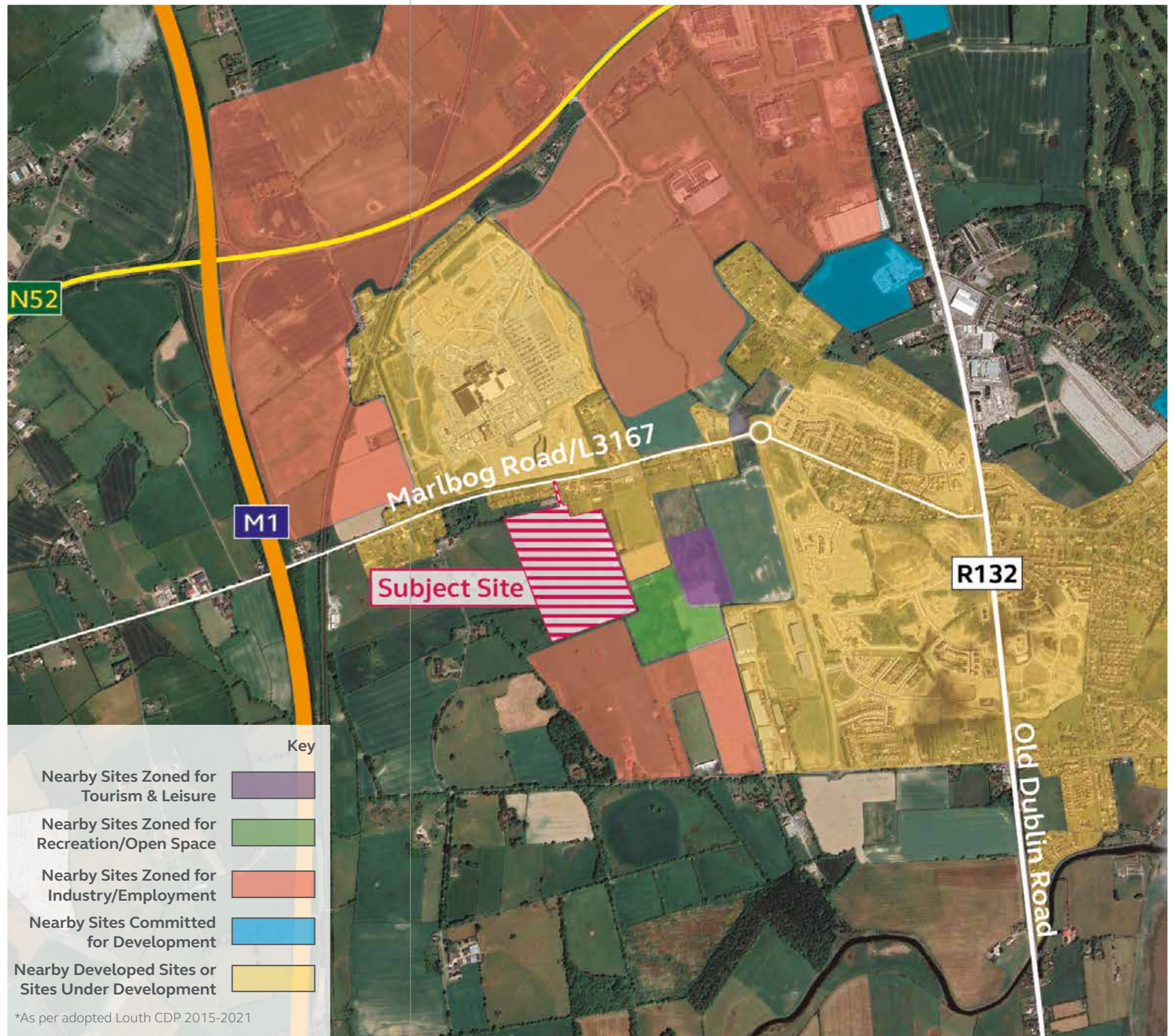
3.3.2 In this regard, as the Planning Authority will note, the development of land for residential purposes is influenced by multiple factors such as services, availability, accessibility and existing infrastructure.

3.3.3 In response we submit the subject lands are an example of why the sequential test should examine each site in detail and not just look at its location. As they are adjacent to existing services, infrastructure and strategically provide a better ratio of job to residences in an area of Dundalk which is very well catered for in terms of existing industry and employment, with employment generating uses projected to increase.

3.3.4 In response we highlight the site is appropriate in terms of sequential development given:

- The expanse of lands to the north are currently zoned and developed for industrial development, with a significant bio-pharmaceutical campus already constructed directly opposite the subject lands and employing over 400 persons.
- The site is directly accessible from the existing road infrastructure
- The site is serviceable
- The site is included within a the settlement boundary of Dundalk
- The site is currently zoned within the extended DEDP Core Strategy for residential use.
- The site is sequential appropriate in that the proximate location is directly south of IDA lands.

3.3.4 We submit these attributes make these lands strategically important in the overall development of Dundalk. Delivery of a residential scheme via an appropriate land use zoning on these lands should therefore be supported by the Planning Authority in advance of many other land parcels elsewhere in Dundalk.



03 Local Context & Concept

3.4 Residential Zoning

Population Change

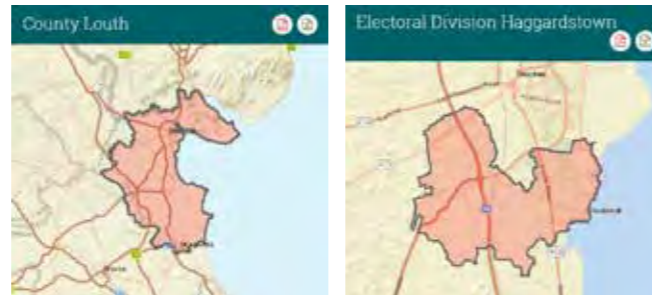
3.4.1 To provide an overview for the Planning Authority in terms of local population change and demand for housing, this section provides a brief outline of the population growth of the State, the Greater Dublin Area (GDA), Co Louth, Dundalk & Environs and also Haggardstown ED according to the CSO census data.

3.4.2 As can be noted from table 1 below, the population of County Louth grew by 39.8% between 1996 and 2016.

3.4.3 Also, Dundalk & Environs has grown substantially between 1996-2016, from 25,762 in 1996 to 39,004 in 2016, representing a population increase of 51.4%.

3.4.4 At a more local level Haggardstown ED this has grown by 59.46% from 1996 to 2016.

3.4.5 On this basis the population growth experienced both at County Level, and at a local level in Haggardstown ED (59.46%) all exceed the growth in the state (31.3%) and the GDA (37.5%) during the same period.



Census Year	State	Greater Dublin Area	Co. Louth	Dundalk & Environs.	Haggardstown
1996	3,636,087	1,405,671	92,166	25,762	4,347
2002	3,917,203	1,535,446	101,802	27,399	4,886
% Change	8.0%	9.2%	10.5%	6.35%	12.39%
2006	4,239,848	1,662,536	111,267	35,085	5,239
% Change	8.2%	8.3%	10%	28.05%	7.22%
2011	4,588,252	1,804,156	122,897	37,816	6,390
% Change	8.2%	8.5%	10.45%	7.78%	21.96%
2016	4,761,86	1,907,332	128,884	39,004	6,932
% Change	3.8%	5.7%	4.87%	3.14%	8.5%

Population change of the State, the Greater Dublin Area, Louth and Dundalk & Environs and Haggardstown ED between 1996 and 2016 as derived from the CSO statistics

Housing Market

3.4.6 As the Planning Authority will note, the housing market in Dundalk has shown significant growth in recent years, influenced by its own population, economic growth and also by the overall demands being exerted for housing units both in County Louth and in the Greater Dublin Area.

3.4.7 On review and as set out in this Table 1 we consider it is reasonable to assume this represents the natural growth of Louth's population and the ongoing demand to live within commuting distance of Dublin City and along key transport corridors.

3.4.8 Also, as is evident in relevant publications and statistics there remains significant pressure on the housing market in the Dundalk and Environs area, with Dundalk being a more affordable and accessible alternative to living in Dublin City.

3.4.9 However, on review of CSO data for new dwelling completions it is noted that units constructed in recent years within County Louth still remains low, particularly for apartment unit provision.

3.4.10 In terms of residential prices, the latest price in the Dundalk eircode area is an asking price of €229,882 (March 2020), which is growth of 139% since the trough in April 2012 of €95,913.

3.4.11 Notably this growth in prices is 139% is greater than that experienced in County Dublin where prices have increased by 69.9% (excluding Dublin City Centre where growth has been 94.2% since the trough).

3.4.12 It is clear these increases in prices are reflective of the existing demand to live in the Dundalk area, both from local buyers and from those whose first preference would be to live in Dublin but due to affordability issues they seek to reside in commuter towns such as Dundalk.

3.4.13 In terms of transactions data from the CSO for 2020 shows that 38 market transactions took place in March 2020, with an average asking price of €229,882. When compared to average Dublin 1 sale prices of €323,643 for March 2020 it is evident Dundalk is a more affordable housing option for purchasers. Also, market evidence suggests in the price range of €210,000 to €240,000 potential demand it at its strongest, particularly for three-bedroom units.

Summary

It is submitted the current lack of availability of units is demonstrative of a shortage of supply and there exists a clear need to provide additional residential units which are appropriate both in terms of unit mix and affordability.

Louth	2017 Q1	2017 Q2	2017 Q3	2017 Q4	2018 Q1	2018 Q2	2018 Q3	2018 Q4	2019 Q1	2019 Q2	2019 Q3	2019 Q4	2020 Q1
Single House	19	20	31	29	24	30	37	46	28	28	37	35	27
Scheme House	57	41	81	86	96	107	97	124	127	98	109	117	85
Apartment	0	1	2	5	5	16	2	15	19	9	14	52	2

New dwelling completions in Louth, Type of Unit and Quarter (source: CSO)

03 Local Context & Concept

3.4 Residential Zoning (continued)

Vacancy Rate

3.4.14 Tables 3 below show the housing type and vacancy rate in County Louth, Haggardstown ED and the state respectively as per CSO data in 2016.

3.4.15 On review it is noted the percentage of vacant dwellings at County Level is extremely constrained with 88.57% of units occupied and within Haggardstown ED (including Haynestown) it is 85.48%. This is high in comparison to the state figure of 85.22% which demonstrates that both County Louth and Haggardstown ED has a lower rate of available units than the remainder of the country.

3.4.16 Also, with ongoing population growth trends evident from census figures this occupancy rate has increased in recent years as Dundalk south is now classified as a rent pressure zone.

3.4.17 Further, at a county level it is noted from recent figures that the vacancy rate in Louth is now recorded at an extremely low rate of 3.7%.

3.4.18 Further, our analysis has found that in terms of existing apartment numbers it is noted that apartments form a low overall percentage of the housing mix within the county at only 4.6% of the total residential stock.

3.4.19 On the basis of the above it is clear there is a need for more residential units to be provided to accommodate the growing population within County Louth and Haggardstown ED, and in particular for apartment units.

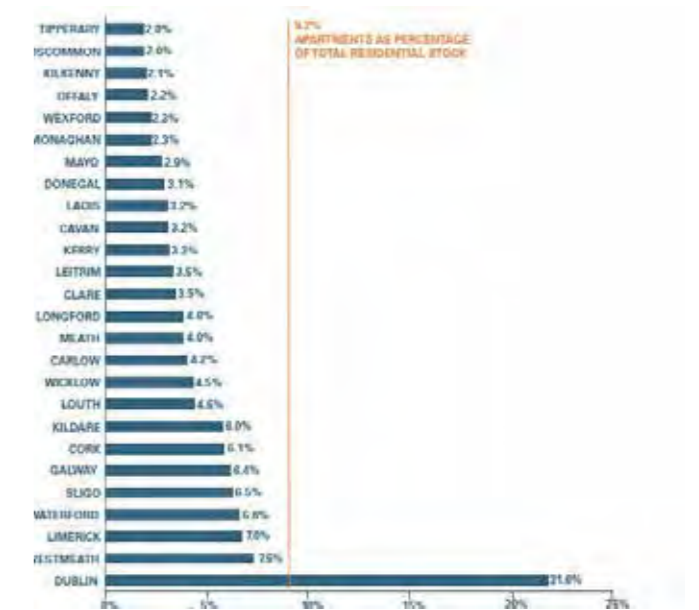
3.4.20 We consider this is reflected in the designation of County Louth as a rent pressure zone since July 2019, which in turn correlates with market evidence that a higher vacancy rate is required to avoid excessive increases in rents or purchase prices and ensure a housing market functions efficiently.

	Louth County Permanent Dwellings	Louth County %	Haggardstown ED Permanent Dwellings	Haggardstown ED %	State Permanent Dwellings	State %
Occupied	45,528	88.57%	2,474	85.48%	1,707,453	85.22%
Temporarily Absent	1,158	2.25%	88	3.04%	50,732	2.53%
Unoccupied Holiday Homes	761	1.48%	22	0.76%	62,148	3.10%
Other Vacant Dwellings	3,952	7.68%	310	10.71%	183,312	9.15%
Total	51,399	100%	2,894	100%	2,003,645	100%

Occupancy Rates of Existing Units



Vacancy Rate of Housing Stock by County (geodirectory.ie)



Apartment Units as a % of Housing Stock (geodirectory.ie)

Summary

- With Dundalk recognised as a regional growth centre in the context of a Dublin-Belfast corridor (to be targeted for growth and investment as a key driver for the border region), we submit that the proposed development is wholly consistent with the strategy and objectives as set out in the NPF.
- As the subject lands are strategically positioned within the settlement boundary of Dundalk, the zoning of the subject lands for residential is consistent with the objectives set down by the RSES in that it will improve the supply of residential being located directly adjacent to major employers in the town and facilitating compact growth through the consolidation of the urban area.
- The population growth experienced at County Level in the Dundalk and Environs Area and at a local level in Haggardstown ED (59.46%), all exceed the national growth rate (31.3%) and the Greater Dublin Area (37.5%) from the period 1996-2016.
- This growth together with the current lack of availability of units is demonstrative of a shortage of supply and there exists a clear need to provide additional residential units which are appropriate both in terms of unit mix and affordability.
- This is reflected in the designation of County Louth as a rent pressure zone since July 2019, which in turn correlates with market evidence that a higher vacancy rate is required to avoid excessive increases in rents or purchase prices and ensure a housing market functions efficiently.
- In summary, delivery of a residential scheme via an appropriate land use zoning on these lands should be supported by the Planning Authority.

03 Local Context & Concept

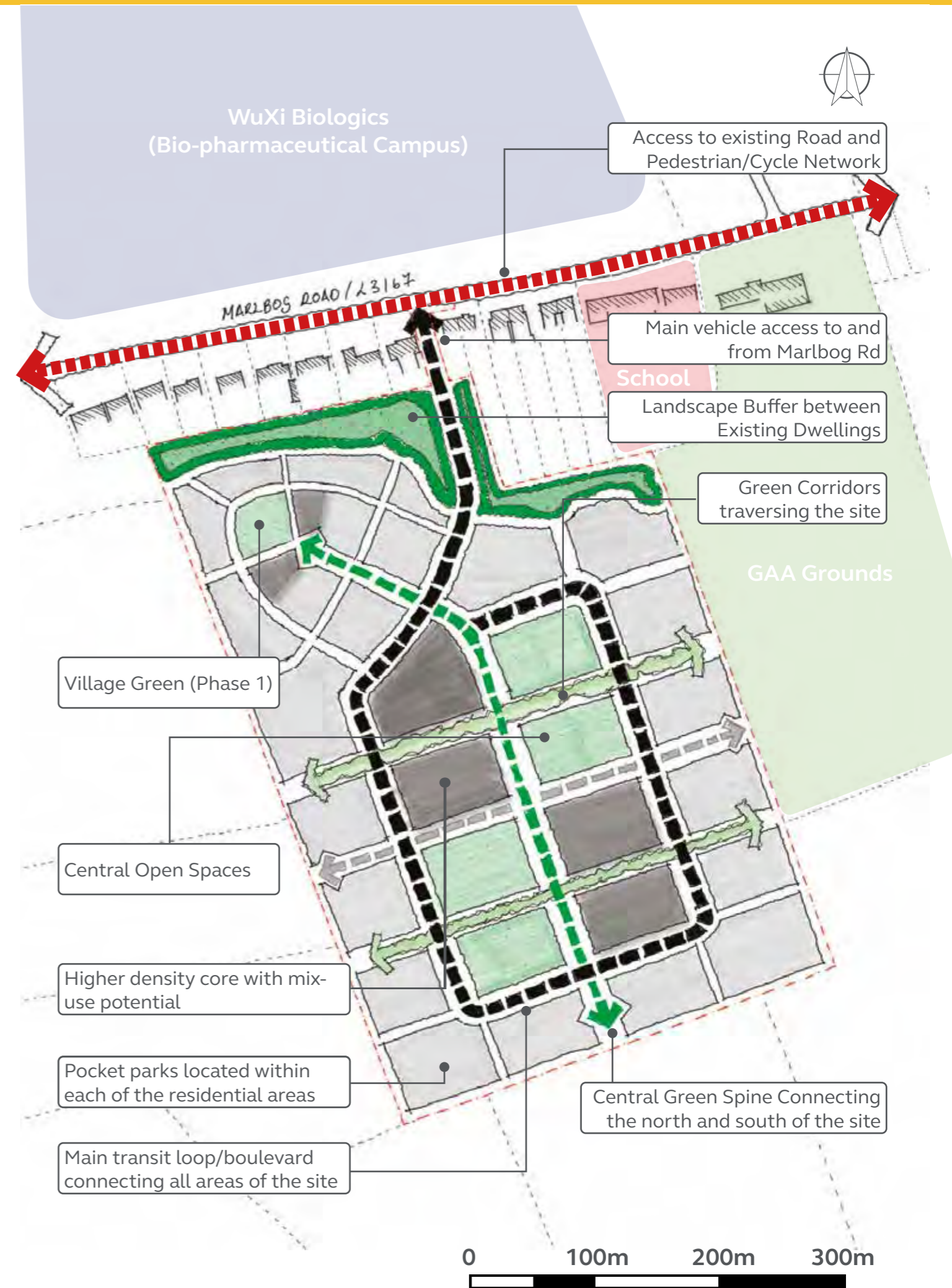
3.5 Concept Design

3.5.1 Being an expansive site in a suburban location, the planning rationale is to deliver a high quality residential development (via appropriate land use zoning) which enhances the environment and provides for a residential scheme appropriate to its context.

3.5.2 As part of SHD proposals currently being progressed by the design team the overarching concept for the subject lands is to achieve:

- A scheme which creates a sense of place both within the site and its surrounds, allowing long term stewardship and civic pride to flourish amongst those who are to reside in and surrounding the neighbourhood.
- A scheme which adopts the principles of sustainable urbanism, compared to typical suburban residential development
- Cultural and social diversity through a variety of residential unit types suitable for a range of people and households, adding to the overall housing type and tenure which are available in the area.
- A high quality public realm, one which is enclosed by attractive buildings which actively front onto such spaces providing pedestrian comfort and security.
- A street pattern conceived as a network, forming a hierarchy of accessible and permeable routes to create the greatest number of alternatives when moving from one part of the neighbourhood to the other.
- A scheme which responds to its locational context in terms of density and scale, making the best and most efficient use of the land and the opportunities which it presents.

3.5.3 For reference we refer the Planning Authority to SHD pre-planning discussions held 24th September 2020 and section 3.7 below.



03 Local Context & Concept

3.6 Phasing & Delivery

3.6.1 With a total site area of approximately 11.5ha, it is prudent to assume the subject lands will be developed in a minimum of 2 phases. The phasing approach will ensure completion of all necessary works (car parking/open space/site works etc.) prior to the occupancy of each phase of the development. Open space provision for the entire development will be 15% of the project area as a minimum.

3.6.2 In all phases, the development will be in accordance with national policy guidelines, specifically:

- Childcare Facilities (2001)
- Design Standards for New Apartments (2018)
- Sustainable Residential Development in Urban Areas (2009)
- Urban Development and Building Height Guidelines (2018)

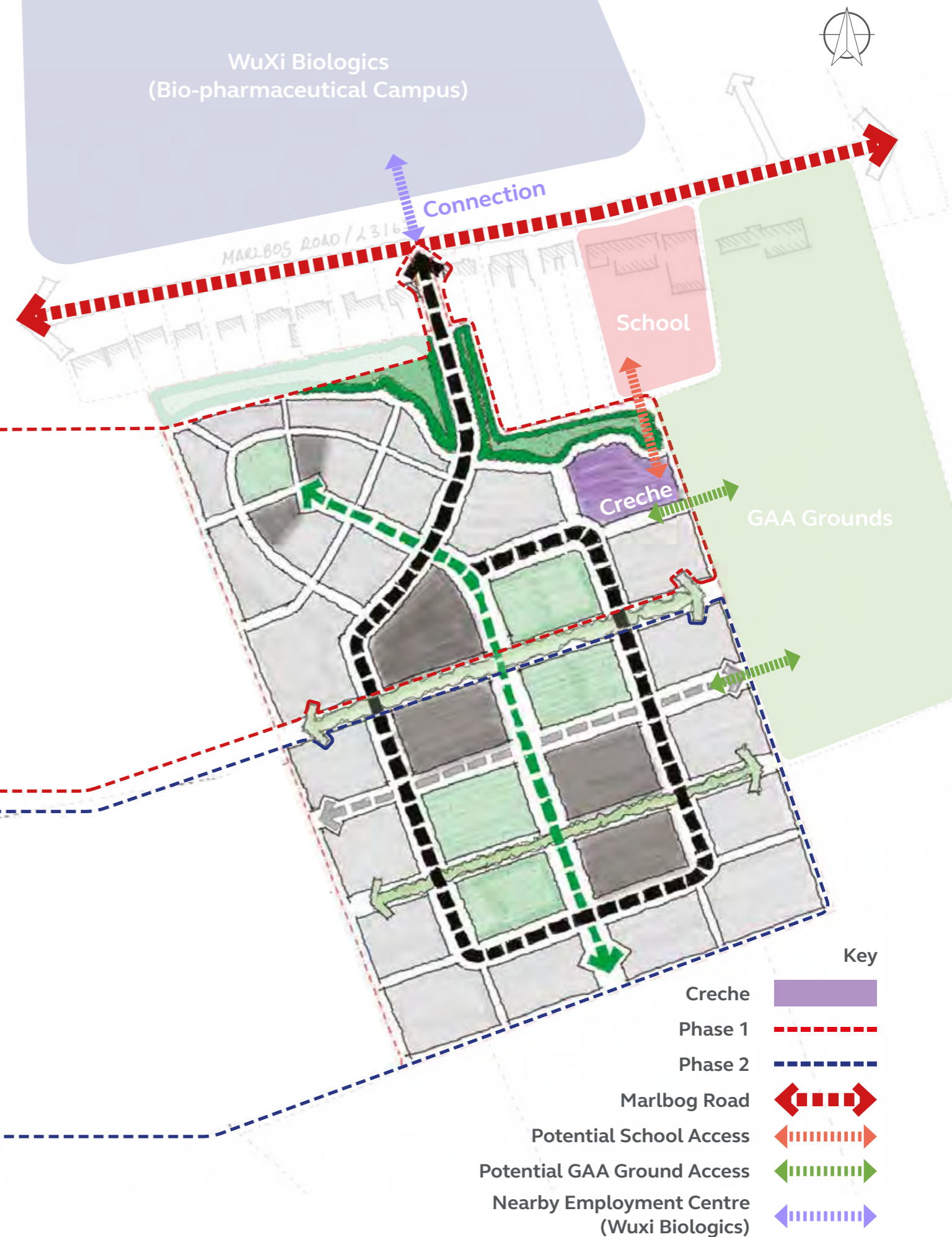
Phase 1 - Approx. 5.5 Ha

- Density: 35units/Ha minimum
- Facilities: Childcare Facility/Creche
- Unit Types: Variety of unit types ranging from single family to multi-unit apartment buildings.
- Establish connection to road and utility infrastructure at Marlbog road.
- Install planting and landscape buffer on northern boundary
- First phase of open space and green spine to be developed as part of a wider green infrastructure network.



Phase 2 - Approx. 6Ha

- Density: 35units/Ha minimum
- Facilities: Small scale community retail, community/recreation centre.
- Unit Types: Variety of unit types ranging from single family to multi-unit apartment buildings.
- Completion of central boulevard
- Completion of developments open space network and green corridors.
- Potential for minor revisions following lessons learned from Phase 1.



03 Local Context & Concept

3.7 SHD proposals

3.7.1 The SHD proposal as currently being developed has been primarily informed by context, policies relevant guidelines and urban design manuals. The design rationale includes:

- The context of the area already established being respected, whilst also achieving an appropriate increase in density levels.
- The provision main open space areas located centrally within the site.
- The creation of localised pockets of open space areas.
- A hierarchy of roads in order to create home-zones.
- A variety of house types to cater for a range of demographic and household sizes;
- A variety building heights in order to create a strong sense of place.
- The placing of a creche and community facility in a central location within the site.
- The creation of vistas to and from the development.

3.7.2 The orientation and layout of buildings within the proposed development is also designed to create a balance between scale, active streetscapes and also providing a sense of place and also providing for connections with the locality.

Proposed Accommodation

3.7.3 The breakdown of residential accommodation is as follows:

Description	Number	Percentage
1 Bed Unit (Apartment)	24	8%
2 Bed Unit (Apartment & Terrace Dwellings)	113	36%
3 Bed Units	149	47%
4 Bed Units	32	10%
Total	318	100%

Unit Mix Summary

3.7.4 Also to ensure the development provides a sense of place the layout also incorporates provision of a central community building.

3.7.5 The layout and design specifics of this community building has been designed to an appropriate building height and strategically positioned in terms of layout to provide a focal point both for internal views and when viewed from the main entrance via Marlbog Road.

3.7.6 Also, in terms of functions to be provided within the community building it will incorporate a creche, which can then also be used for community purposes outside of creche operating hours.



Proposed Site Layout Plan

03 Local Context & Concept

3.8 Proposed Zoning (as per Draft 2021-2027 CDP)

3.8.1 The subject lands are designated as per the published draft CDP 2021-2027 as:

- **'L1' Strategic Reserve**

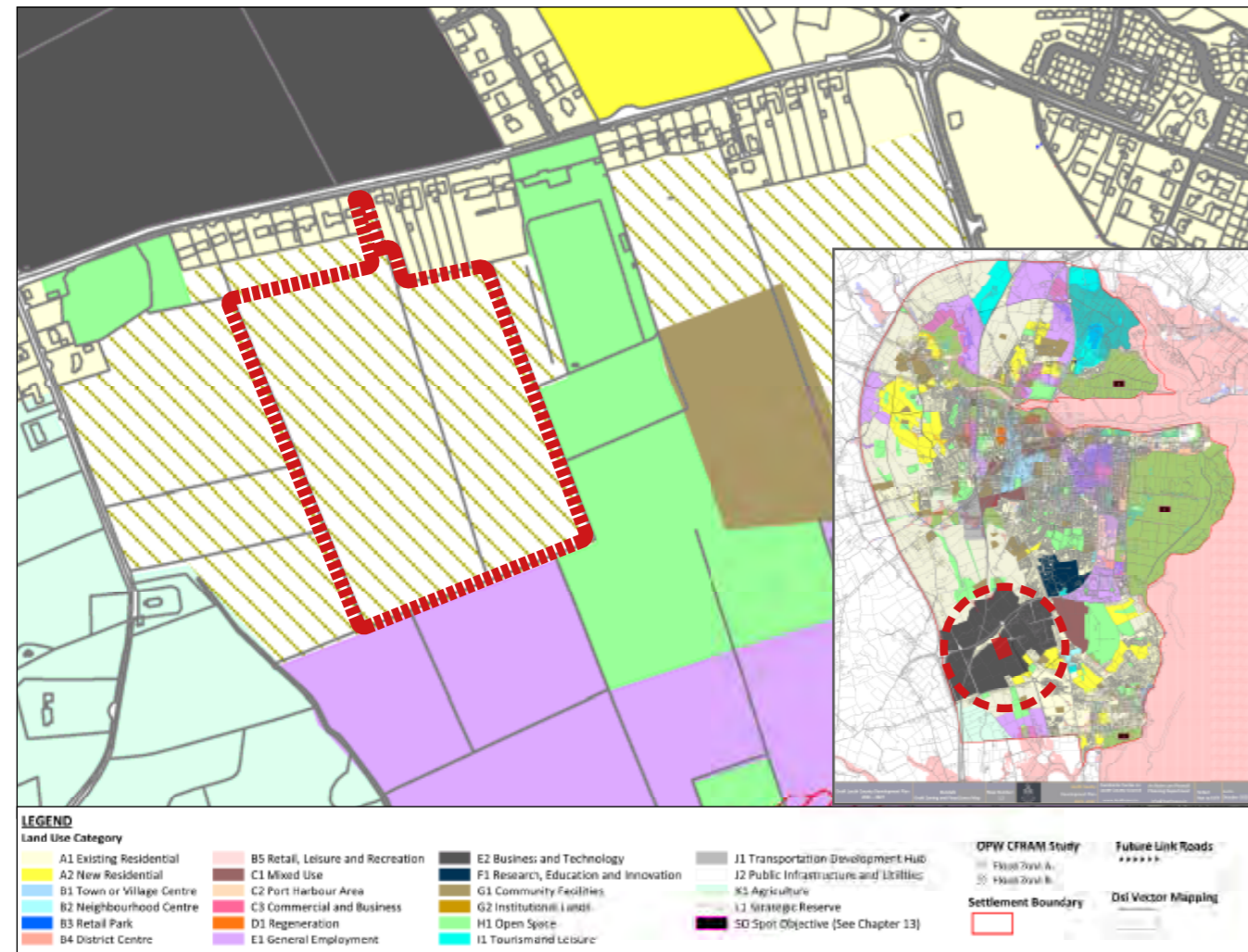
3.8.2 On review of the draft Louth CDP 2021-2027 zoning designation "L1 - Strategic Reserve" we note such lands are reserved for:

'strategically located lands that will generally not be available for development until after the expiration of this draft Plan', the objective of which is "to provide a land reserve for the orderly expansion of the settlement into the future.'

3.8.3 For reference we refer to this "A1 - Existing Residential" zoning as shown in the proposed draft CDP 2021-2027 below.

3.7.4 However, it is our considered assessment that this designation proposed for the subject lands is not appropriate going forward, as set out previously.

3.7.5 In the context of our client's SHD proposals being progressed to deliver housing units on the lands we request the Planning Authority to amend the proposed zoning as per section 3.9 and 3.10 below.



Proposed Zoning under Draft Louth CDP 2021-2027

3.9 Recommended Zoning

3.9.1 As the Planning Authority will note, the section 28 development plan guidelines state:

- Development plans should be strategic
- Development plans should be a catalyst for positive change and progress
- Development plans should anticipate future needs on an objective basis
- Socio-Economic Development is to be promoted

3.9.2 Going forward, as part of the 2021-2027 CDP we request:

- **The Planning Authority include the subject lands within the settlement envelope for Dundalk.**
- **The subject lands are zoned in entirety for 'A2 New Residential'.**
- **The Development Management Zoning Matrix permits alternative uses to be acceptable in principle.**

3.9.3 We refer to section 3.10 overleaf which demonstrates our justification is appropriate to the context.



Recommended Zoning under Louth County Development Plan 2021-2027

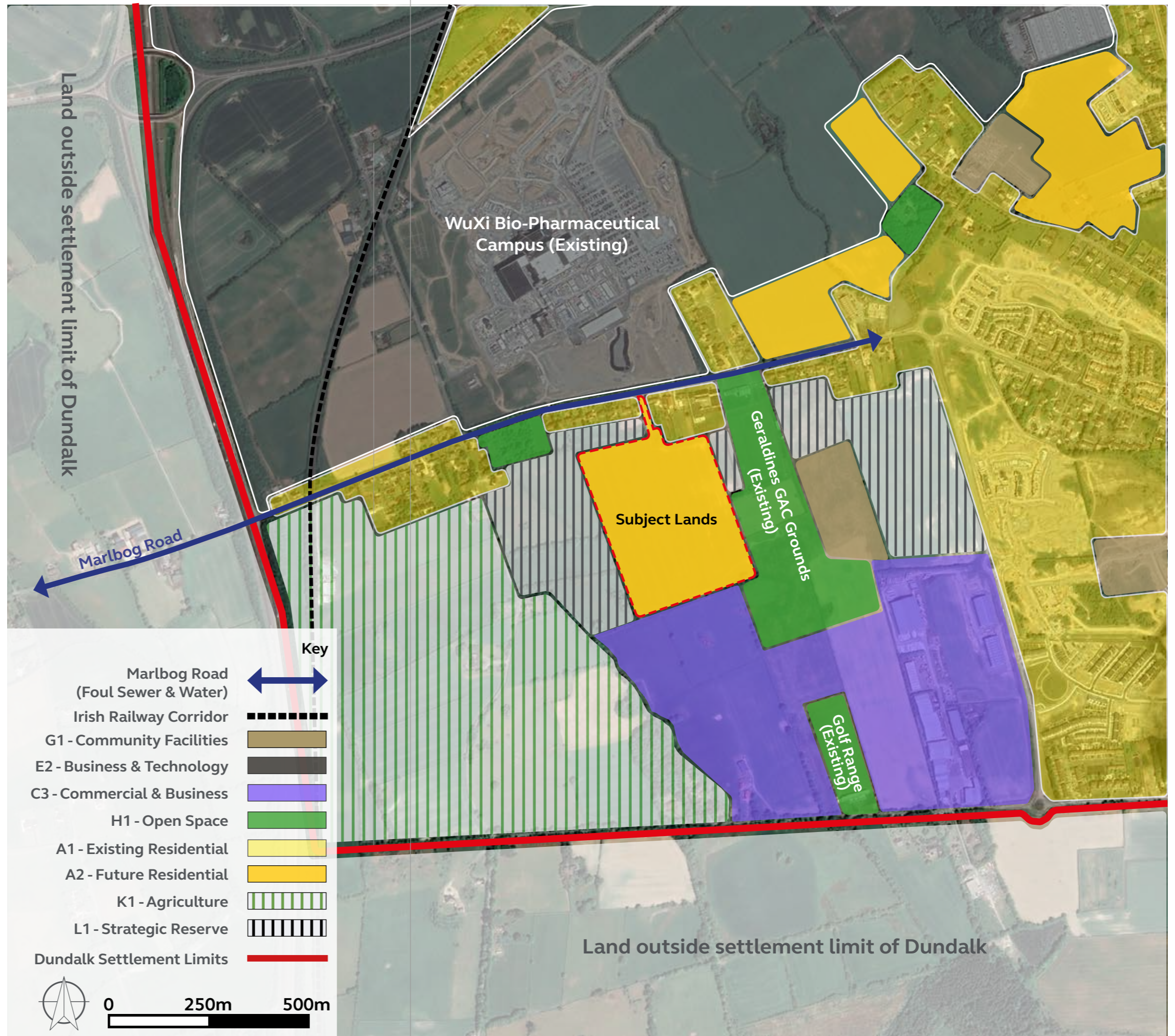
03 Local Context & Concept


3.10 Proposed Zoning & Context

3.10.1 On our review of the existing local context we highlight the surrounding land uses in the immediate vicinity are compatible with a proposed residential scheme on the subject lands. We highlight:

- The lands are adjacent to an existing school and GAA grounds. Delivery of a scheme at this location will be well served by local and wider community infrastructure.
- The development of the lands for a residential development is consistent with the residential profile of Marlbog Road and the wider environs of south Dundalk.
- The lands are proximate to the WuXi pharmaceutical campus.
- The lands are proximate to IDA lands directly north. We note expansion of this area for E2 - Business & Technology, is specifically proposed in the draft CDP as: *'lands [which] have been identified to attract and facilitate science and technology, research and development, major offices, global services (including financial services) high tech manufacturing based employment in high quality campus style developments.'*

- The lands are sequentially appropriate for residential development, given available lands to the east are already near-completion in terms of residential schemes.
- The lands will provide a sustainable location for a residential scheme- proximate to local employment centres and achieve a balance in terms of residential units close to centres of employment.
- The zoning of the lands avoid unsustainable travel patterns to nearby (existing & future) employment centres.
- We submit that zoning the subject lands as 'A2 - New Residential would be consistent and appropriate in land use terms.





04 | Summary & Conclusion

4.1 | Summary & Conclusion

4.0 SUMMARY & CONCLUSION



This submission relates to the parcel of lands at Marlbog Road, Haynestown, Dundalk.

In summary this submission requests:

- **The Planning Authority include the subject lands within the settlement envelope for Dundalk.**
- **The entirety subject lands are zoned for A2 New Residential.**
- **The Development Management Zoning Matrix permits alternative uses to be acceptable in principle and open for consideration.**

Key Points:

- With Dundalk recognised as a regional growth centre in the context of a Dublin-Belfast corridor (to be targeted for growth and investment as a key driver for the eastern and midland region), we submit that the proposed development is wholly consistent with the strategy and objectives as set out in the NPF.
- As the subject lands are strategically positioned within the settlement boundary of Dundalk, the zoning of the lands for 'A2 New Residential' is consistent with the objectives set down by the RSES in that it will improve the supply of residential units for Dundalk in a sustainable manner through the consolidation of the urban area.
- The population growth experienced at County Level in the Dundalk and Environs Area and at a local level in Haggardstown ED (59.46%), all exceed the national growth rate (31.3%) and the Greater Dublin Area (37.5%) from the period 1996-2016.
- There is a clear shortage of residential units being provided in Dundalk.

- In terms of location, the lands are adjacent to an existing school and GAA grounds. Delivery of a scheme at this location will be well served by local and wider community infrastructure.
- The development of the lands for a residential development is consistent with the residential profile of Marlbog Road and the wider environs of south Dundalk.
- The lands are sequentially appropriate for residential development, given available lands to the east are already near-completion in terms of residential schemes.
- The lands will provide a sustainable location for a residential scheme- proximate to local employment centres and achieve a balance in terms of residential units close to centres of employment.
- The zoning of the lands avoid unsustainable travel patterns to nearby (existing & future) employment centres.
- We submit that zoning the subject lands as 'A2 - New Residential would be consistent and appropriate in land use terms.

- The Haggardstown area in particular has seen an increased rate of development following the significant investment from a number of well-known multi-national companies in the locality, as well as higher level educational institutions (Dundalk Institute of Technology - DKIT) all within 2 to 3kms of the subject site.
- The addition of residential accommodation in the areas would provide a better ratio of job to residences in an area of Dundalk which is well catered for in terms of industry and employment, and zoned heavily for future industry/employment expansion.
- In this context we trust the Planning Authority will have regard to the contents of this submission.
- In terms of the forthcoming SHD proposal to deliver the lands for a residential scheme we request the Planning Authority to support this proposed SHD development via the development plan process with zoning as A2 New Residential.
- Going forward we welcome the opportunity to participate in all stages of the plan making process and we request that this submission be given full consideration by the Planning Authority.



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