



**PLANNING SUBMISSION RE DRAFT LOUTH COUNTY
DEVELOPMENT PLAN 2021-2027**

In respect of

**LANDS AT RED BARNES ROAD
DUNDALK**

Prepared by

GENESIS PLANNING CONSULTANTS

On behalf of

RUTH CONNOLLY

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Ronan Woods

-

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1 INTRODUCTION

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 Ruth Connolly to examine and assess the existing policy context, settlement envelope in Dundalk and to prepare this submission to the Planning Authority on her behalf.
- 1.1.3 In terms of background our client is in ownership of a landholding in the Red Barns road area of Dundalk and is currently examining options for moving the lands forward for development.
- 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 2015-2021 CDP and the Regional Spatial Economic Strategy for the Eastern and Midland Region (RSES).
- 1.1.5 The analysis undertaken by Genesis Planning identified a number of areas of interest which demonstrate that the subject lands are appropriate for inclusion in the settlement envelope for Dundalk. These are set out in this report.

1.2 Background to Submission

- 1.2.1 Ruth Connolly has engaged Genesis Planning to make a submission on her behalf to the Planning Authority on the draft County Development Plan 2021 – 2027, specifically in relation to her lands at Roseville, Red Barns Road, Dundalk, Co. Louth.
- 1.2.2 In totality the subject lands occupy approximately 8.75ha at Roseville, approximately 500m north-east of Dundalk Retail Park on the Red Barns Road (R172) which runs from Point Road on the southern boundary of the Castletown River/Dundalk Harbour to Blackrock before terminating at the 'Old' Dublin Road (R132).
- 1.2.3 This submission to the Planning Authority outlines proposals for the subject lands to be included in the settlement envelope of Dundalk and zoned for residential development in the forthcoming CDP.

2 SUBJECT LANDS IN CONTEXT

2.1 Subject Lands

2.1.1 The subject lands occupy approximately 8.75ha in the Red Barns road area of Dundalk, in the townland of Marsh South. As per the Louth County Development Plan 2015-2021, Dundalk is designated 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.'

2.1.2 Multiple access points to the site exist from the Red Barns road are present currently given an existing dwelling directly adjacent, with access to the residual lands also established. Views are confined to the immediate stretch of Red Barns Road which runs along the eastern boundary of the subject lands.

2.1.3 At a local context the subject lands lie immediately adjacent to lands identified for 'Consolidation of Urban Core', and within the settlement envelope of Dundalk.



Figure 1: Location of lands at Roseville, Red Barns Road, Dundalk



Figures 2 & 3: Access from Red Barns Rd. to existing dwelling on site (left), access to residual lands (right)

2.2 Current Planning Context

2.2.1 Under the current Louth CDP 2015-2021 the subject lands are included within the settlement boundary of Dundalk as indicated below (lands outlined and hatched in red), however they are not currently zoned under any land use classification; also known as 'white lands'.

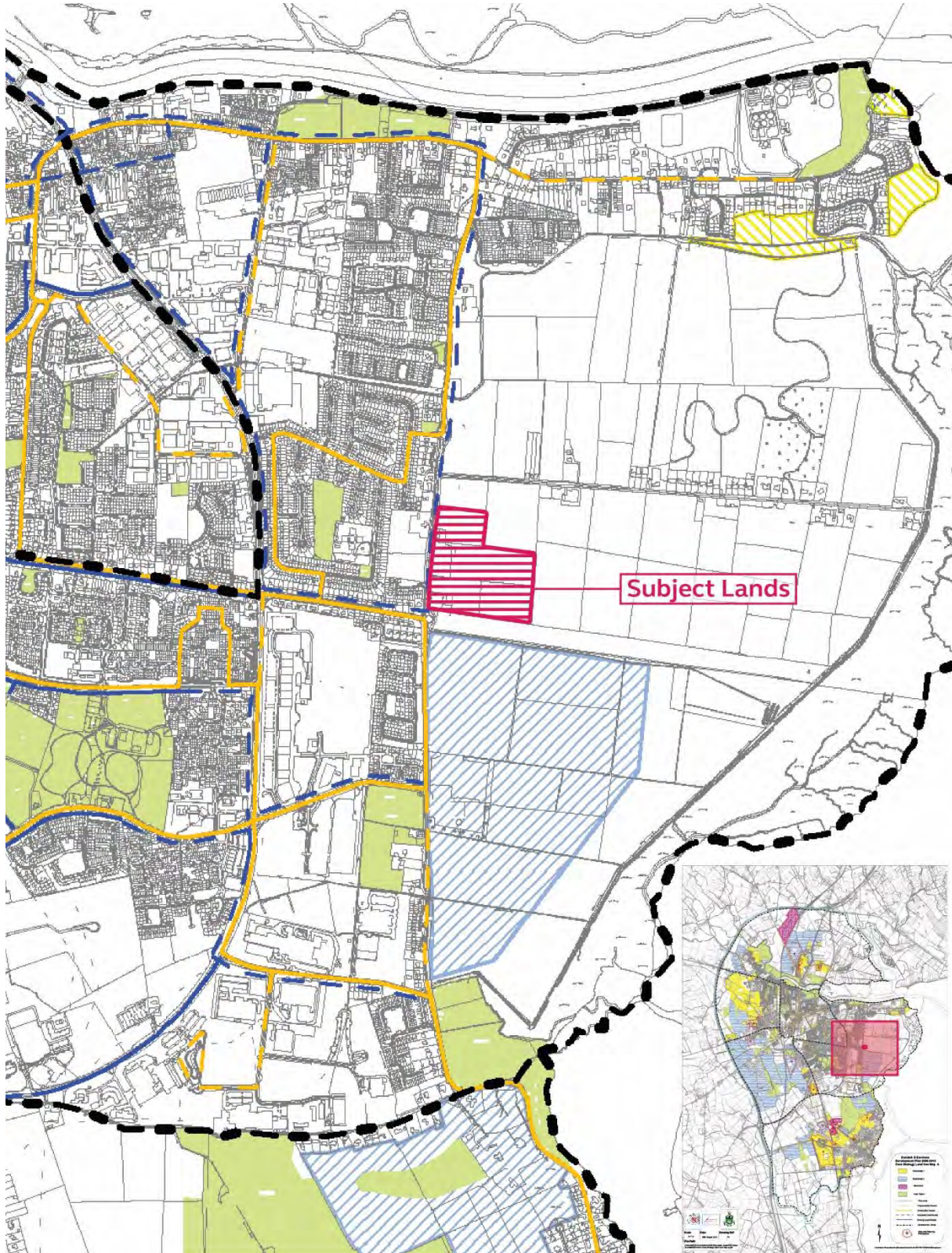


Figure 4: Dundalk Zoning Map & subject site (Source: Louth County Development Plan 2015-2021)

2.3 Surrounding Site Context

2.3.1 Located on the periphery of the town centre/urban core of Dundalk, the subject lands are in close proximity to existing residential developments, as well as local amenities, retail centres and employment generating land uses.



Figure 5: Surrounding context of the subject lands with Town Core identified opposite and west

2.4 Planning History & Context

2.4.1 A review of the planning register identified 2no. applications previously granted in respect of the subject lands for the existing dwellings.

File Number	55526527
Development Description	Dwelling house and demolish existing dwelling house (Grant)
File Number	55521924
Development Description	Dwelling house and septic tank (Grant)

Table 1: Previous planning application for subject lands



Figure 6: Location of existing dwellings on subject lands

2.4.2 In summary, part of the subject lands has already been developed for residential use. Figure 6 above indicates the location of the existing dwellings.

- 2.4.3 Also of relevance to the planning history and context is planning application reference 19413 relating to the lands located on Red Barns road immediately opposite the subject site.
- 2.4.4 We note this development has been deemed acceptable by the Planning Authority in terms of location, and in particular on assessment relating to flood risk matters. This proposed development (currently under appeal) is seeking permission for a total of 81 new residential dwellings and the refurbishment of the existing Rose Cottage.
- 2.4.5 We highlight this adjacent development site was deemed acceptable by the Planning Authority despite being located on lands which are more vulnerable to flooding than our client's subject lands. We refer the Planning Authority to planning decision as dated 31/05/2019 which has deemed this adjacent residential scheme as acceptable.
- 2.4.6 For ease of reference figure 7 below demonstrates the coastal flood zone areas as per the OPW CFRAM tidal flood maps in the area around the subject lands and the site pertaining to application 19413.
- 2.4.7 Of particular relevance we highlight the lands relating to application 19413 is located on lands which are subject to an 0.5% Tidal AEP event (1 in 200-year flood event), whereas our clients lands (the subject lands) are at a higher topographical level, and only partly designed as being at risk of a 0.1% tidal AEP event.

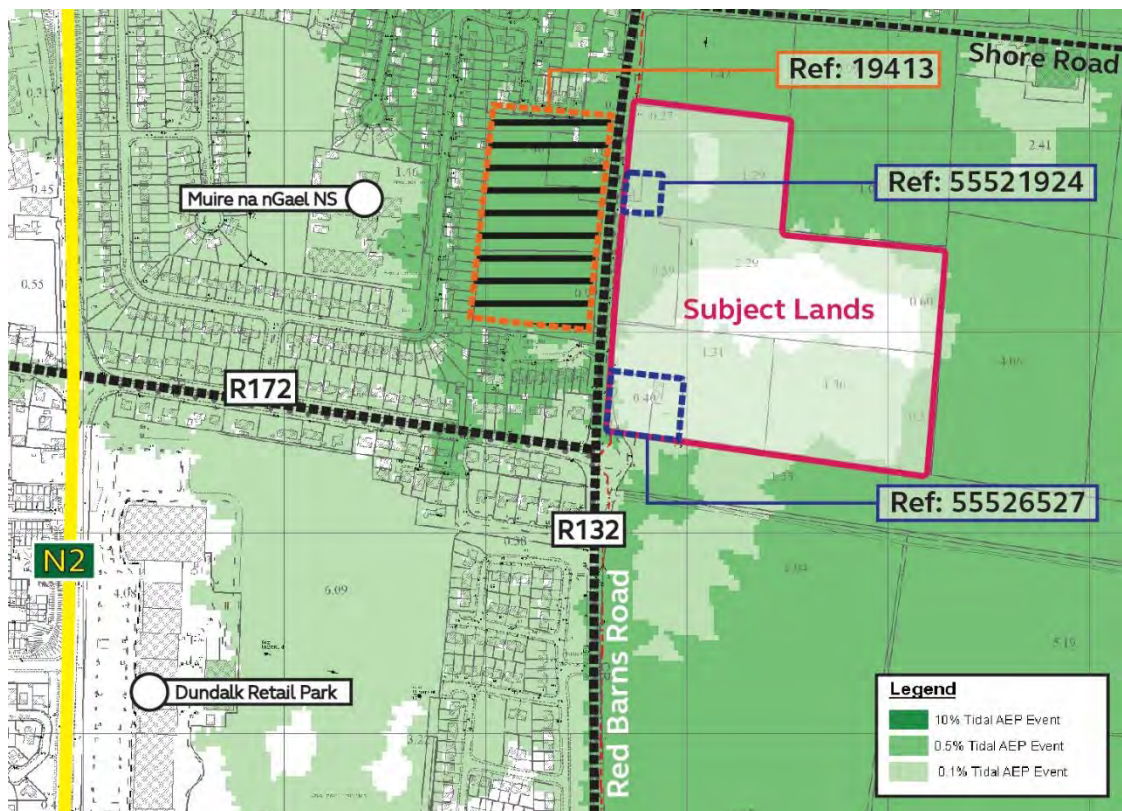


Figure 7: Tidal Flood Extents around subject lands as per CFRAM/OPW maps

- 2.4.8 Of particular relevance in this regard we highlight page 72 of the guidelines 'The Planning System and Flood Risk Management Guidelines states:

'The minimum floor levels for new developments should be set above the 1 in 100 year river flood level (1 in 200 coastal flood level) including an allowance for climate change, with appropriate freeboard.'

2.4.9 We submit this is particularly relevant to our client’s lands as it is clear the existing ground levels are largely already above the 1 in 200 coastal flood level, and a site layout can readily be achieved so that the minimum floor level is above the 1 in 200 coastal flood level.

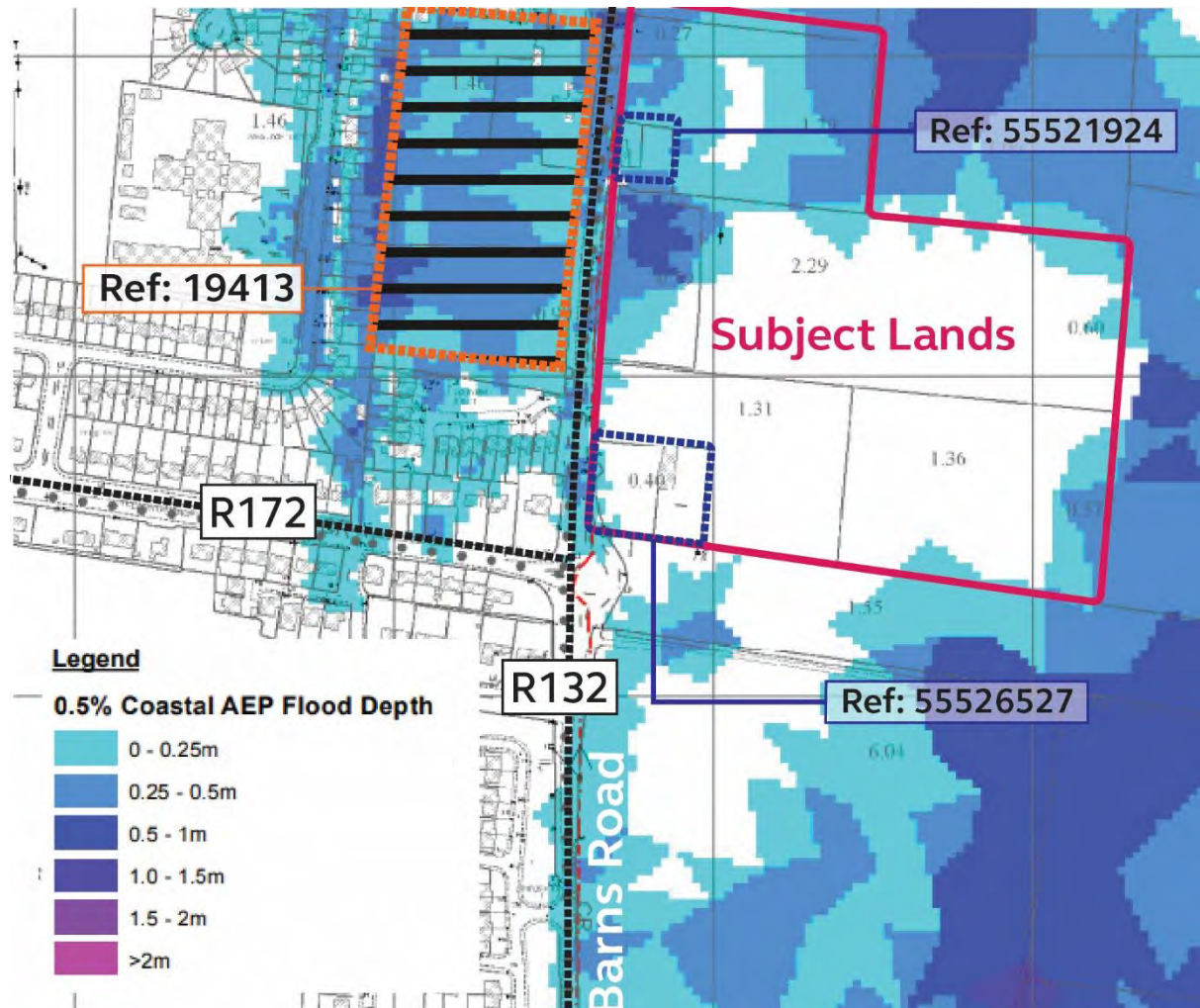


Figure 8: Tidal Flood depths associated with the subject lands as per CFRAM maps

- 2.4.10 We highlight this is consistent with the planning rationale incorporated into application 19413.
- 2.4.11 On this basis, and to ensure consistency in terms of assessing land uses in this locality the approach by the Planning Authority should therefore not ‘blanket zone’ lands which are only ‘marginally’ at risk of 1:1000 AEP tidal flood events.
- 2.4.12 We submit it is therefore appropriate for the subject lands to be acceptable for residential development (in terms of flood risk) as it can be demonstrated that the requirements of the section 28 guidelines ‘The Planning System and Flood Risk Management’ can be complied with.

2.5 Land context

2.5.1 We note the draft CDP proposes a 'spot zoning' under table 13.2 which seeks

'To preserve the ecological value and character of the lands and to provide appropriate recreational and amenity facilities.'

Table 13.2: Spot Objectives

Spot Objective Number	Location	Objective
1	Dundalk	To preserve the ecological character and biodiversity value of the Nature Conservation Area.
2	Dundalk	To preserve the ecological value and character of the lands and to provide appropriate recreational and amenity facilities.
3	Dundalk	To provide for the development of a retirement village.
4	Ardee	To provide a public park with a minimum area of 12 acres (4.9 hectares) as part of a residential development.
5	Ardee	To provide for the development of housing for older people, specifically designed for flexibility and adaptability to accommodate the physical and cognitive needs of residents as they develop over time.
6	Drogheda	To provide a minimum of 40% of public open space as part of any residential development on these lands.

2.5.2 In response we submit this 'blanket zoning' of our client's lands, and indeed the entirety of the area which spot objective no.2 relates to, is inappropriate. Existing dwellings, associated curtilages, farmlands and zoned lands are included within this blanket zone, and no site-specific assessment has been undertaken by the Planning Authority to determine what are the ecological/character value of the lands in this zone.

2.5.3 We submit this spot objective therefore requires either removal, or considerable revision to relate only to lands which identified as being of ecological/character value.

2.5.4 In respect of our client's subject lands we request this spot objective therefore be removed and does not apply going forward.

2.6 Housing Context & Policy

2.6.1 We note section 3 of the draft plan sets out the policies and objectives for housing in the county going forward.

2.6.2 Of relevance we note objective HOU15 and HOU32 which seek:

'To promote development that facilitates a higher, sustainable density that supports compact growth and the consolidation of urban areas, which will be appropriate to the local context and enhance the local environment in which it is located.'

'To encourage and promote the development of underutilised infill, corner and backland sites in existing urban areas subject to the character of the area and environment being protected.'

2.6.3 We request these objectives be maintained going forward.

- 2.6.4 We also request that a further objective be included in the development plan that covers scenarios such as our client's lands (ie an agricultural holding) so that one-off dwellings are permitted, either in the form of serviced sites or as stand-alone dwellings.
- 2.6.5 We submit such a policy objective will be a sustainable response to facilitate land-owners of suburban lands to accommodate family members, and represent both an appropriate response to outer-suburban low-density contexts and also be a sustainable means of enabling infill development on lands that will otherwise not be developed.
- 2.6.6 It is our considered opinion that this approach will be wholly consistent with relevant NPF objectives to achieve urban consolidation in a manner appropriate to context, in particular objective 3a which seeks '*To deliver at least 40% of all homes nationally within the built-up footprint of existing urban settlements*'.

2.7 Land use zoning objectives

- 2.7.1 We note section 13.19 of the draft plan sets out the land use zoning objectives for the county going forward.
- 2.7.2 Of particular relevance to our client's lands is the proposed 'H1 Open Space' zoning objectives as shown below.

13.19.21 Open Space (H1)

Objective

To preserve, provide and improve recreational amenity and open space.

Guidance

This zoning refers to areas of 'active' and 'passive' open space. Development that will improve the facilities or quality of the

open space, amenity or recreational facilities, or contributes to the enjoyment of the space will be considered.

Generally Permitted Use

Cycleway/Walkway trails, Park/Playgrounds, Recreational/Amenity Open Space, Recreational/Sports Facility.

Open for Consideration

Allotments, Bring Banks, Coffee Shop/Tea Room, Car Park for recreational purposes, Community Facility, E- Charging Facility, Restaurant, Recycling Facility (Civic & Amenity), Telecommunications Structures, Utilities.

- 2.7.3 In response we submit this 'blanket zoning' of our client's lands as 'Open Space H1' is entirely inappropriate, given the established agricultural and residential use of the lands. Existing dwellings, associated curtilages, farmlands and zoned lands are included within this blanket zone, and the extent of Open Space H1 is inappropriate, given no open space is existing or proposed for this location.
- 2.7.4 We submit this 'Open Space H1' zoning objective therefore requires to be amended so that it either does not include our client's lands, or the objectives/generally permitted uses/open for consideration be amended to include for (i) agricultural developments and (ii) residential developments.
- 2.7.5 We submit our amendments to the objectives for open space H1 will therefore reflect and accommodate existing land uses in this locality, which has not been captured or provided for in the proposed draft zoning objectives.

3 REVIEW OF CURRENT PLANNING POLICY CONTEXT

3.1 NPF

3.1.1 The National Planning Framework sets out strategic objectives which Planning Authorities are to have regard to. Specifically we highlight:

- Objective 3a *'To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements'*.
- 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 7 *'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'*.

3.1.2 Also of relevance is under appendix 3 of the NPF which sets out a tiered approach to zoning of lands. In summary:

- (I) Serviced lands should be identified;
- (II) Serviceable lands should be identified.
- (III) Contiguous lands should be identified

3.1.3 We submit the NPF sets out a clear policy direction for strengthening of existing urban areas and a move away from rural based one-off housing. Use of contiguous, sequential sites is advocated and the tiered approach to zoning of lands set out. Of particular relevance appendix 3 states that tier 1 serviced zoned lands *'will generally require the lands to [be] within the footprint of or spatially sequential within the identified settlement.'*

3.1.4 Further of particular note is objectives 72a and 72b:

- *'Planning Authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan'*.
- *'When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.'*

3.1.5 Planning Authorities through the plan process should identify 'serviced lands' and consider the same as a priority through the development plan process.

3.1.6 In response we submit the subject lands are appropriate for zoning as envisaged by the NPF given:

- The lands are serviced, with there being an existing dwelling already constructed on site, and the residual lands are 'serviceable' from the existing utilities and infrastructure installed on Red Barns Road.
- Objectives 3, 5 & 7 of the NPF are therefore complied with.
- The lands are contiguous to existing developed lands and in close proximity to the urban core of Dundalk.

3.2 Regional Spatial Economic Strategy – Eastern & Midland Region

3.2.1 The RSES for the eastern and midland region 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.’*

3.2.2 The RSES recognises the importance of the Dublin to Belfast economic corridor and the strategic function of this eastern corridor as a driver for regional economic development. As the largest economic agglomeration on the island of Ireland, the cities and towns along the corridor are home to a population of around 2 million people:

‘Cross boundary coordination is a significant element of the Strategy and will be even more so with the onset of Brexit, playing a critical role in supporting economic growth and competitiveness.’

3.2.3 From 2006 to 2016 the Region grew by 15% - an increase of over 300,000 people – exceeding the state average growth rate of 12% over the same period. The Region contains some of the fastest growing communities in the Country which increases demand for housing, infrastructure and services in those areas.

3.2.4 Being located along the eastern corridor and close to the border with Northern Ireland, Dundalk is strategically placed to benefit from the growth strategy outlined in the RSES, in particular it’s proximity northern city of Newry - the linkages with which are heavily referred to (most notably the Drogheda-Dundalk-Newry corridor).

3.2.5 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.’*
- *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.*

3.2.6 As the subject lands are strategically positioned on the ‘sequential periphery’ to the town core of Dundalk it is clear the inclusion of the lands within the settlement envelope of Dundalk will be consistent with the objectives set down by the RSES, facilitating compact growth and offering a viable alternative to rural one-off housing.

3.3 Louth County Development Plan (CDP) 2015 – 2021

Overview & Context

3.3.1 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 the general public as to how development proposals are likely to be assessed. The plan also informs the decisions of the Planning Authority in deciding the suitability of different types of development in the county.

3.3.2 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.'

3.3.3 Under the current Louth CDP 2015-2021 the subject lands are included within the settlement boundary of Dundalk however they are not currently zoned under any land use classification, also known as 'white lands'. As such there are no zoning objectives currently associated with the subject lands.

Core Strategy

3.3.4 The core strategy of the CDP focuses on building strong urban centres and protecting rural hinterlands, in particular the preferred development strategy is aimed at building '*Critical mass in the large growth towns of Dundalk & Drogheda.*'

3.3.5 Of specific relevance is section 2.3 which states the strategic aims of the core strategy which amongst other things, aims to:

- Prioritise sustainable development at appropriate locations within the towns of **Dundalk** and Drogheda as economic drivers for the County
- To support the creation of a compact urban form in all settlements in County Louth

3.3.6 Also worth noting is section 2.9 which refers to the future growth of the county:

'In order to promote and facilitate the achievement of critical mass within the Gateway of Dundalk and develop Drogheda as an important strategic urban settlement some 60% of future population growth is directed towards these two towns.'

Settlement Strategy

3.3.7 The settlement hierarchy within the county aims to promote sustainable residential development within existing towns and villages and to make provision for sustainable housing in the rural areas of the county. It is based on factors such as size of population, range of services, the extent and range of community and other facilities available.

3.3.8 The Louth County Development Plan 2009-2015 sets out a clearly identifiable four level settlement hierarchy, composed of both urban and rural settlements. This settlement hierarchy is based on factors such as size of population, range of services, the extent and range of community and other facilities available.

3.3.9 As stated previously Dundalk is designated as a Level 1 settlement, policy objectives of reference within the settlement strategy include:

SS 2: To facilitate the development of Dundalk and Drogheda and to maintain their positions at the top of the settlement hierarchy.

- 3.3.10 In response to the above, incorporating the subject lands within the settlement envelope of Dundalk in the 2021-2027 CDP would be consistent with all relevant policies and objectives as identified in the current CDP, facilitating compact growth and offering a viable alternative to rural one-off housing.

Housing Strategy

- 3.3.11 The principle aim of a housing strategy is to ensure that the proper planning and sustainable development of the area of the Development Plan provides for the housing of the existing and future population of the county in an appropriate manner. Determining housing demand during the lifespan of the Development Plan is fundamental to the overall Housing Strategy.

- 3.3.12 Key principles of the housing strategy include:

- To promote socially balanced and inclusive communities in all housing areas across Louth,
- To provide for varying identified needs in the County with respect to housing typology, size and mix,
- To monitor the housing strategy, allowing for adequate consultation with those who are central to the implementation of the policies of the strategy.

- 3.3.13 Key policies to note from the housing strategy include:

RES 2

'To enable every household to have available an affordable dwelling of good quality, suited to its needs, in a good environment and, as far as possible, at the tenure of its choice.'

RES 6

'To encourage and promote the creation of attractive mixed use sustainable communities which contain a variety of housing types and tenures with supporting community and residential amenities, and where Part V is visually and otherwise integrated into the overall development, thus counteracting undue segregation.'

3.4 Population Change & Demographics

- 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 and Dundalk & Environs according to the CSO census data.
- 3.4.2 As can be noted from table 1, 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 On this basis the population growth experienced both at County Level (39.8%), and at a local level in Dundalk & Environs Area (51.4%) all exceed the growth in the state (31.3%) and the Greater Dublin Area (37.5%) during the same period.

Census Year	State	Greater Dublin Area	Co. Louth	Dundalk & Environs.
1996	3,636,087	1,405,671	92,166	25,762
2002	3,917,203	1,535,446	101,801	27,399
% Change	7.7%	9.2%	10.5%	6.35%
2006	4,239,848	1,662,536	111,267	35,085
% Change	8.2%	8.3%	10%	28.05%
2011	4,588,252	1,804,156	122,897	37,816
% Change	8.2%	8.5%	10.45%	7.78%
2016	4,761,865	1,907,332	128,884	39,004
% Change	3.8%	5.7%	4.87%	3.14%
Total Change 1996-2016 (%)	31.0%	35.7%	39.8%	51.4%

Table 1: Population change of the State, the Greater Dublin Area, Louth and Dundalk & Environs and between 1996 and 2016 as derived from the CSO statistics

3.5 Housing Market

3.5.1 As the Planning Authority will note, the housing market in Dundalk has shown significant growth in recent years, influenced by it's 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.

3.5.2 However, on review of CSO data for new dwelling completions (Table 2 below), it is noted that units constructed in recent years within County Louth still remains low. 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 in the Dundalk & Environs Area.

Louth	2017 Q3	2017 Q4	2018 Q1	2018 Q2	2018 Q3	2018 Q4	2019 Q1	2019 Q2	2019 Q3	2019 Q4	2020 Q1	2020 Q2	2020 Q3
Single House	31	29	24	30	37	46	28	28	37	35	27	19	37
Scheme House	81	86	96	107	97	124	127	98	109	117	85	155	105
Apartment	2	5	5	16	2	15	19	9	14	52	2	14	7

Table 2: New dwelling completions in Louth, Type of Unit and Quarter (source: CSO)

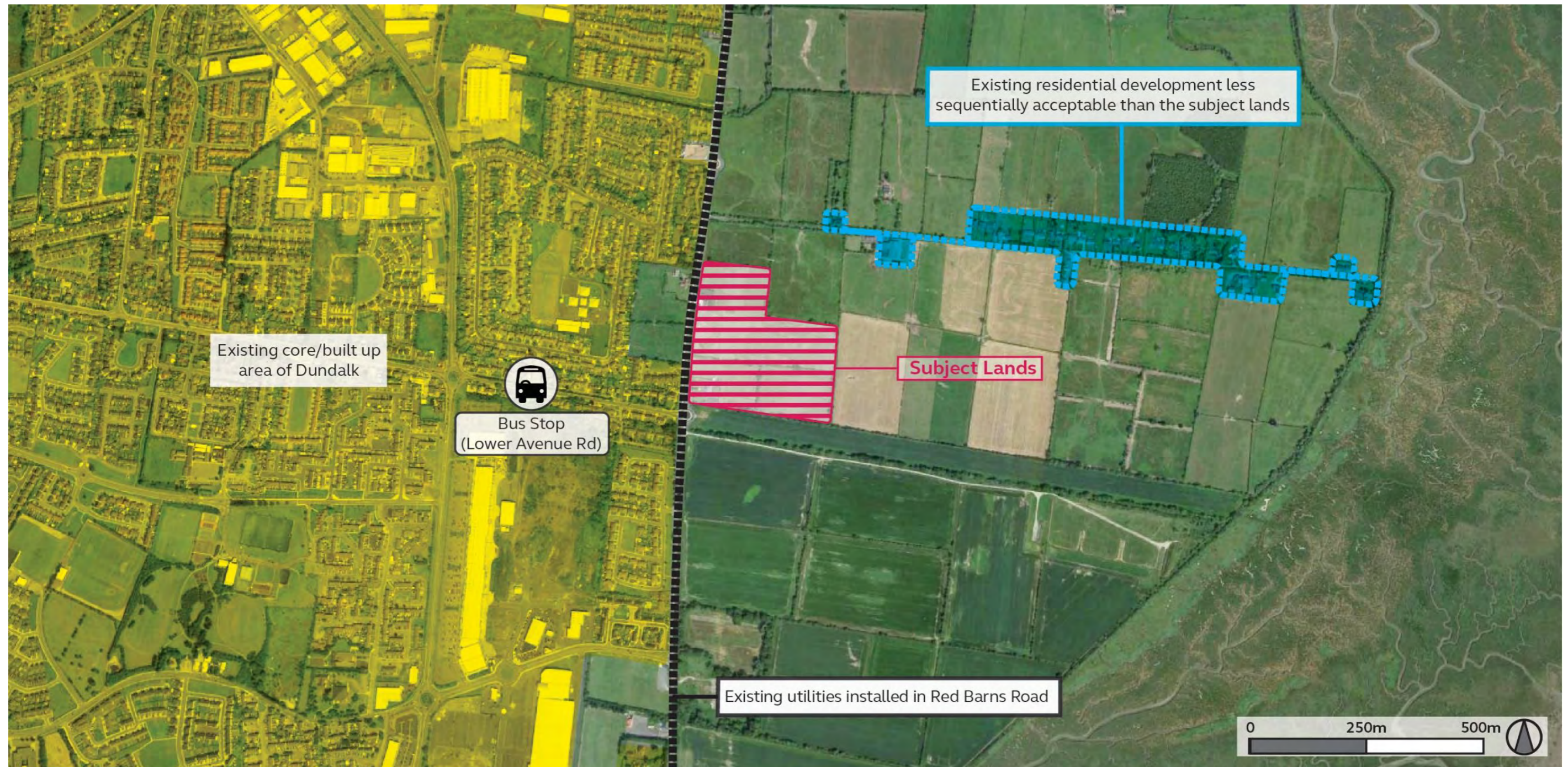
4 SEQUENTIAL DEVELOPMENT OF LAND, SERVICES & CONNECTIVITY

- 4.1 The merits of the sequential approach in land use planning are well established.
- 4.2 In this regard, as the Planning Authority will note, the development of land for residential purposes is influenced by multiple factors such as services, accessibility and existing infrastructure. A site may be in relatively close proximity to the town/village centre but due to the lack of existing infrastructure or other factors the site may not be developable during this plan period.
- 4.3 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 it's location, particularly as the subject lands are adjacent to existing services, infrastructure and strategically provide an opportunity to achieve infill development.

4.4 Specifically in response we highlight:

- The lands are serviced.
- The lands are directly accessible from the existing road infrastructure.
- The lands are within walking distance of local amenities.
- The lands are within walking distance (350m) of the bus route which passes along Lower Avenue Road.
- The lands are sequentially the next available parcel of lands for residential development, within the settlement boundary of Dundalk and directly adjacent to an existing dwelling.
- There are existing developments which are located further removed from the urban core, making the subject lands infill development and appropriate in sequential terms.

4.5 We submit these attributes make these lands sequentially acceptable for residential development via an appropriate land use zoning designation which reflects both the agricultural, residential and infill nature of the lands.

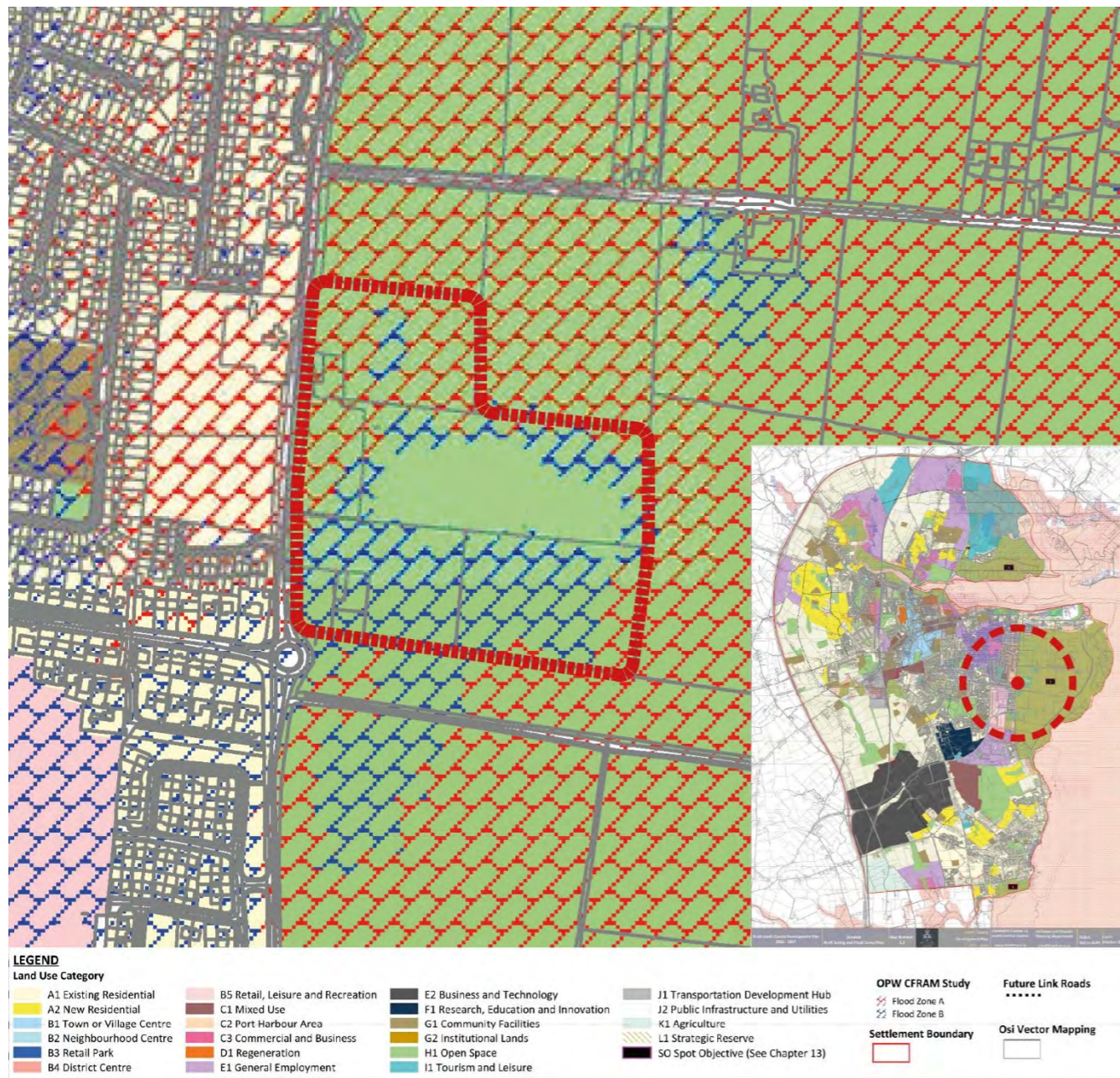


5 Proposed Zoning (As Per Draft 2021-2027 CDP)

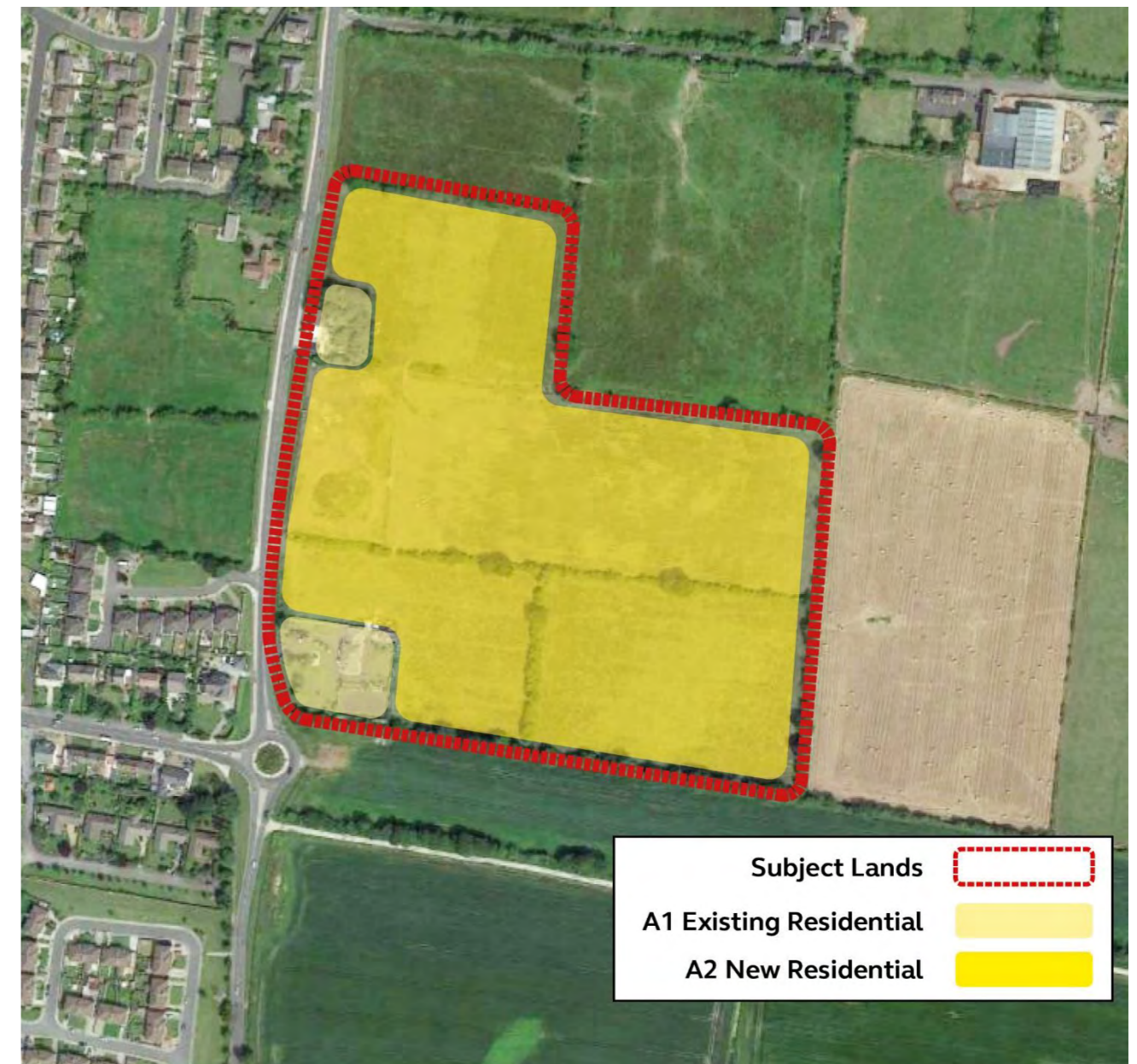
- 5.1 We note the subject lands are designated as per the published draft CDP 2021-2027 as 'H1 Open Space'. For reference we refer to this 'H1 – Open Space' zoning as shown below.
- 5.3 On review it is our considered assessment that this designation proposed for the subject lands is not appropriate going forward given:
- It fails to recognise the established residential dwelling on the lands or the agricultural use.
 - The lands are serviced and sequentially appropriate for development as per the approach set out for zoning under the NPF and Development Plan Guidelines.
 - The lands can be developed to meet all section 28 guideline and policy requirements.
- 5.4 In the context of our client's proposal and intent to erect residential dwelling(s) on family lands adjacent to the existing family homestead, we request the Planning Authority to revise the proposed zoning.

6 Recommended Zoning (Draft 2021-2027 CDP)

- 6.1 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
- 6.2 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 where the existing dwellings are located are zoned 'A1 Existing Residential'
 - The residual lands where the applicant intends to develop are zoned both as A1 and A2 Residential.
 - The land use zoning matrix includes an objective so that one-off dwellings are permitted, either in the form of serviced sites or as stand-alone dwellings.



Proposed Zoning for subject lands (outlined in red) under Draft Louth CDP 2021-2027



Recommended Zoning for subject lands (outlined in red) under Draft Louth CDP 2021-2027

7 SUMMARY AND CONCLUSION

7.1 This submission relates to the parcel of lands as identified at Red Barns Road, Dundalk, Co. Louth. In summary, this submission requests the following:

- **That the Planning Authority include the subject lands as outlined within the settlement envelope for Dundalk Town.**
- **That the Planning Authority include lands already developed under planning as 'A1 Existing Residential' in the forthcoming Louth CDP 2021-2027**
- **That the Planning Authority include the residual lands identified as 'A2 New Residential' in the forthcoming Louth CDP 2021-2027**
- **In terms of housing policies that a further objective be included in the development plan that covers scenarios such as our client's lands (ie an agricultural holding) so that one-off dwellings are permitted, either in the form of serviced sites or as stand-alone dwellings.**
- **That the spot objective under table 13.2 be amended so that the 'blanket zoning' of our client's lands, and indeed to entirety of the area which spot objective no.2 relates to is removed. We request this spot objective does not apply going forward given our client's existing dwelling, agricultural lands and appropriateness of the subject lands for development purposes.**
- **In terms of land use zoning objectives, we submit the 'blanket zoning' of our client's lands as 'Open Space H1' is entirely inappropriate, given the established agricultural and residential use of the lands. Existing dwellings, associated curtilages, farmlands and zoned lands are included within this blanket zone, and the extent of Open Space H1 is inappropriate, given no open space is existing or proposed for this location.**

We submit this 'Open Space H1' zoning objective therefore requires to be amended so that it either does not include our client's lands, or the objectives/generally permitted uses/open for consideration be amended to include for (i) agricultural developments and (ii) residential developments. our amendments to the objectives for open space H1 will therefore reflect and accommodate existing land uses in this locality, which has not been captured or provided for in the proposed draft zoning objectives.

7.2 In terms of our justification that the lands are appropriate for development, we again refer the Planning Authority to CFRAM maps and tidal flood levels, which do not render our client's lands as inappropriate for development. We also refer to the comparable lands adjacent, which have already been deemed acceptable in terms of flood risk under application 19413.

7.3 As per the tiered approach for zoning required under the NPF we submit our client's lands are entirely appropriate for development, being serviced and appropriate in physical terms for development for residential purposes, given they are serviced.

7.4 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 zoning is consistent with the strategy and objectives as set out in the NPF.

- 7.5 Relevant policy objectives under the NPF set out strategic objectives which provide clear policy support for strengthening of regional growth centres such as Dundalk. We again highlight:
- Objective 3a *'To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements'*.
 - 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 7 *'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'*; and
- 'In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.'*
- 7.6 As the subject lands are strategically positioned within the settlement boundary of Dundalk, the zoning of the lands for 'A1 Existing Residential' and '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.
- 7.7 As the subject lands are strategically positioned adjacent to the town core of Dundalk, it is clear the inclusion of the lands within the settlement envelope of Dundalk will be consistent with the objectives set down by the RSES, facilitating compact growth and offering a viable alternative to rural one-off housing.
- 7.8 The population growth experienced at County Level (39.8%), and at a local level in Dundalk & Environs Area (51.4%) both substantially exceed the national growth rate (31.3%) and the Greater Dublin Area (37.5%) from the period 1996-2016. This would suggest is a greater need for residential units being needed in Dundalk. This demand is supported by policy objectives at both the national, regional and local level to provide additional units in Dundalk.
- 7.9 The lands will provide a sustainable location for a residential dwelling proximate to employment centres, existing residential developments, local amenities and public transport infrastructure.
- 7.10 In this context we trust the Planning Authority will have regard to the contents of this submission in the preparation of the Louth County Development Plan 2021-2027.
- 7.11 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 in accordance with Part II Section 11 of the Planning and Development Acts.