



19th December 2020

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

Louth County Council

21 DEC 2020

Customer Services
Dundalk

Dear Sir or Madam

DEVELOPMENT PLAN REVIEW.

EHP Services and P. Herr & Associates have been appointed by the Dundalk Golf Club Development Committee to make the following submission in respect of the zoning for Dundalk issued in respect of the draft Louth County Development Plan 2021-2027.

Please find enclosed a separate sheet of contact information in compliance with data protection legislation.

Our Client's submission relates to land located within the Golf Club grounds (see Map 1 overleaf). Our Client requests that this block of land be rezoned from H1 Open Space to G1 Community Facilities. Furthermore these permissions cannot be relied upon ever to be constructed fit County Plan.

The parcel of land is accessible from the Club's existing gated entrance and driveway to the clubhouse and car park. It forms part of a larger land block commonly referred to as the practice area. The driving range is located to the north. The subject site however is not used in any great capacity as a practice area or other use and is surplus to the current and future requirements of the Golf Club.

The subject site is surrounded by extensive residential development and undeveloped blocks of land zoned Residential 1 (RES1) and Residential 2 (RES2) in the Dundalk & Environs Development Plan 2009-2015 and proposed to be zoned A1 – Existing Residential and A2 – New Residential in Maps 1.1 and 1.2 of the draft County Plan (see Map 2 overleaf).

The following table provides a rough estimation of the total potential population that could be accommodated within the zoned but undeveloped lands surrounding the subject site. Using a basic calculation of approved SHD residential units and an approximate number of residential units (based on estimated site areas x development densities of 35 to 50 units per hectare¹ x an average occupation rate of 2.76 persons per household²) an estimated additional 6,625 new residents could be

¹ Section 5.11 – Guidelines for Planning Authorities: Sustainable Residential Development In Urban Areas (2009)

² Table 2.11 - Draft Louth County Plan 2021-2027

accommodated. When existing surrounding houses and estates (The Links, Hamilton Drive & Avenue, Seafield Drive & Ave, Marine Avenue, Crescent & Drive) are also included the lack of any social/communal facilities serving this substantial and growing community is all the more obvious and in need of urgent redress.

Potential Households & Population			
Area	Ha	New Residential Units	Potential Population Increase (persons) Average Occupation Rate @ 2.76 per household
A	6.5	@ 35 per Ha = 227.5	627.9 (227.5no. x 2.76)
		@ 50 per Ha = 325	897 (325no. x 2.76)
B	6.7	@ 35 per Ha = 234.5	647.2 (234.5no. x 2.76)
		@ 50 per Ha = 335	924.6 (335no. x 2.76)
C	7.5	@ 35 per Ha = 262.5	724.5 (262.5 x 2.76)
		@ 50 per Ha = 375	1,035 (375 x 2.76)
ABP-303253-18	n/a	483no.	1,333 (483no. x 2.76)
ABP-304782-19	n/a	158no.	436 (158no. x 2.76)
Total			6,625 persons

The Client formed the view that the distinct lack of overall integration and connectivity between existing houses and estates and those areas with extant permissions to develop more residential units could also be addressed with the provision of centrally located and readily accessible community/civic uses.

It is appreciated that the two neighbouring Strategic Housing Development (SHD) scheme included childcare facilities however we would submit that the scope and capacity of each facility was limited and aimed primarily at serving each development proposal rather than the wider existing or future community. Furthermore those permissions cannot or should not be relied upon ever to be constructed in order to provide these singular social facilities.

There is logic to requesting a sufficient block of zoned lands at the centre of this substantial residential and under-provisioned residential area. The provision of social and community services can promote greater physical and social cohesion between these disparate residential areas and a more tangible sense of community than would be created otherwise.

We envisage the subject site, if rezoned to G1 – Community Facilities, acting as a central core or hub of facilities within low key, high quality buildings and urban spaces providing a variety of medical, civic and community services including:

- Medical Centre -** Doctor, dentist, chiropodist, osteopathic clinics and affiliated pharmacy.
- Social Facilities -** Crèche, multipurpose community space e.g. meeting room, arts centre & gallery.
- Open Space/Recreation -** Playground, active and passive recreational facilities, parkland, hard and soft amenity spaces, integrated facility with Golf Club.

When community facilities are centrally located within the catchment population it serves and more readily accessible by alternative modes of transport i.e. walking and cycling it can enhance the opportunities for greater physical activity, wellbeing, participation in active recreational activities, community interaction and social cohesion. We would submit that the extent of existing and future residential development in the northern environs of Blackrock does not benefit from any great sense of community identity or social cohesion. We are confident that the proposed rezoning would not materially interfere within or detrimentally affect delivery of any of the strategic vision and/or

objectives set out in Chapter 4 of the draft County Plan. We would recommend the Forward Plans Team consider the proposed rezoning within context of a longer term perspective than just the lifespan of the draft County Plan but consider the benefits and necessity of such facilities and uses as these areas of zoned lands are developed in the coming years.

We note draft Policy Objective CS 10 seeks to prioritise the preparation of an Urban Area Plan (UAP) for Dundalk to supersede existing development and local area plans and it will be that plan which deals in more detail with the strategic vision of growth for the town and the necessary zoning objectives and planning policies. However it would be crucial that the UAP aligns with the draft County Plan zoning maps for Dundalk and strategic vision of development for the greater Dundalk area.

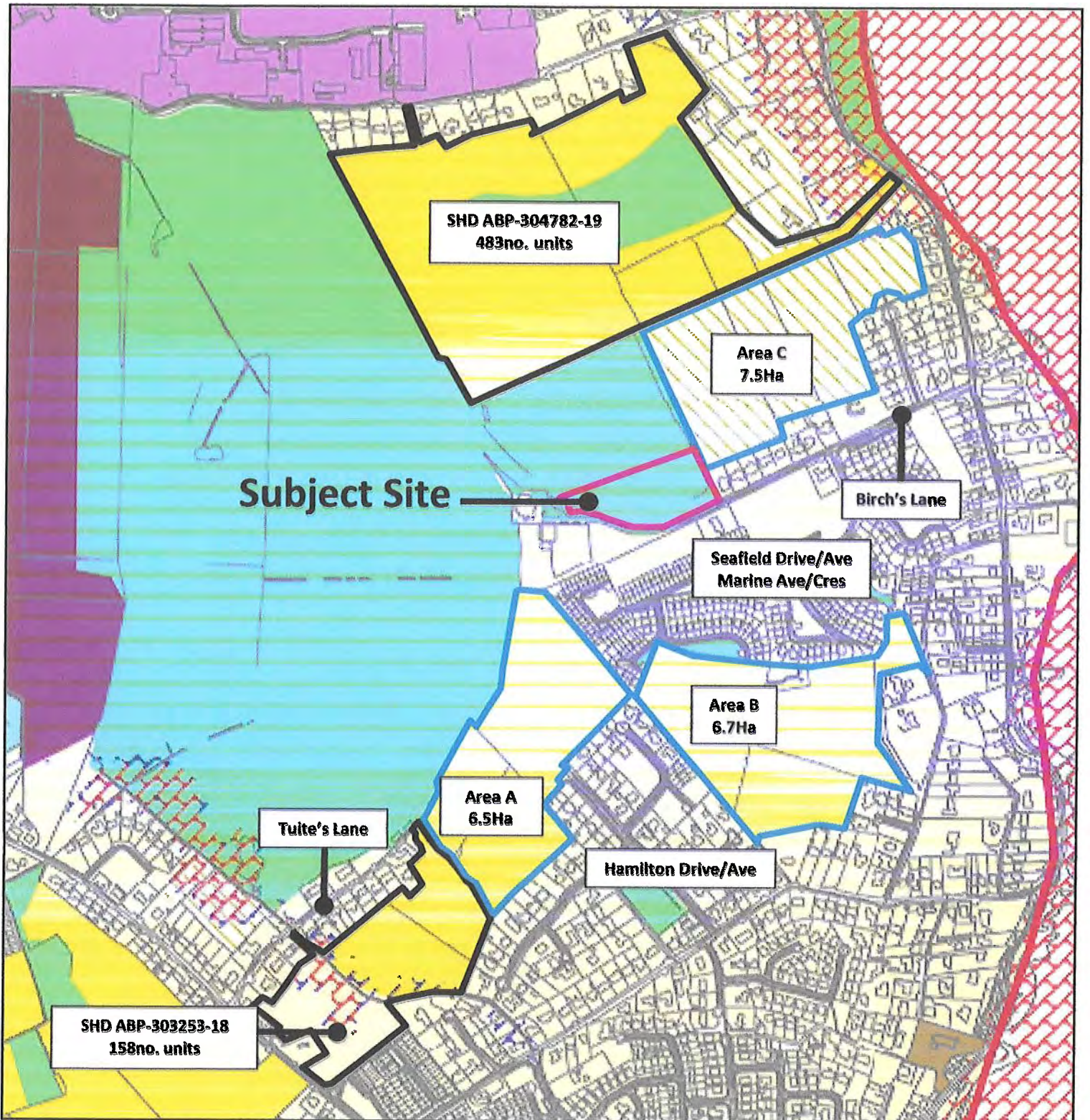
If the Forward Plans Team has any queries regarding the above submission please do not hesitate to contact us.



Map 1 - Site Location Map

Source: Google Maps 2020

Environmental **H**eritage **P**lanning



Map 2 – Draft Dundalk Zoning Map

Source: Draft Louth County Development Plan 2021-2027