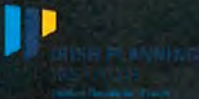


**SUBMISSION ON DRAFT LOUTH
COUNTY DEVELOPMENT PLAN
2021 - 2027**



**Submission on the Draft Louth
County Development Plan 2021-
2027 on behalf of Mr Bill Baldwin,
Murnaghan Brothers Ltd, and John
and Patrick McParland**

22nd December 2020

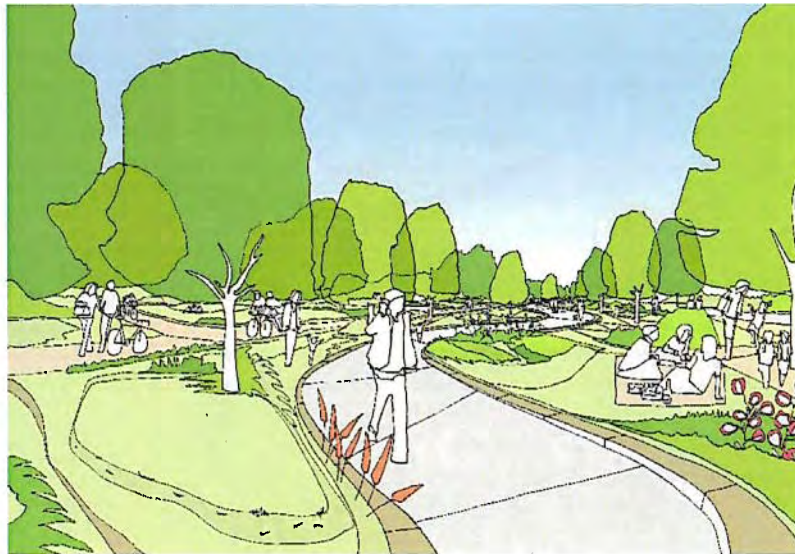


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- Appendix 1: Extract from the Development Plan Guidelines (2007)
- Appendix 2: Relevant Planning Policy Context
- Appendix 3: Masterplan



Artist's Impression of Significant Linear Park/Open Space on the Subject Lands

EXECUTIVE SUMMARY

Introduction and Context

- This submission is made on behalf of a consortium of landowners, including Mr Billy Baldwin, Murnaghan Brothers Ltd, and John and Patrick McParland, in relation to development of lands on the south western boundary of Dundalk Town Centre.
- The subject lands are located on and abut the south eastern boundary of Dundalk Town Centre. The Ardee Road, R171, runs along the northern boundary of these lands with direct access to Dundalk Town Centre at a distance of approximately 2 kilometres. This would be approx. 20 minutes' walk on the footpaths adjacent the R171 leading directly to the Dundalk Town Centre or a 5 minute cycle on the R171.

Proposal and Benefits of Development on the Subject Lands

- It is our considered view that these three land parcels, proposed to be zoned as Strategic Land Reserve in the Draft Louth County Development Plan 2021-2027 are suitable for development for significant residential communities over the Development Plan period.
- This submission is supported by a concept masterplan document prepared by Henry J Lyons Architects which sets out how a residential community can be delivered at this location, and how there would be a number of significant public benefits delivered as part of such a development.
- It is considered that, in addition to representing an appropriate site in itself for sustainable residential development, the subject site has significant strategic potential in terms of infrastructure, including contributing directly to the delivery of a strategic road link through the land, a new railway station to the south of Dundalk, and a significant linear park which has the potential to contribute in a major way to the green network in Dundalk and County Louth.
- As indicated in the Masterplan, there are a number of significant planning benefits that can be delivered as part of development on this site. These are summarised below:
 - Delivery of a planned and co-ordinated community of up to circa 1,300 no. new homes in a variety of typologies.
 - Act as a key catalyst for the new Link Road from R178 Carrickmacross Road to R171 Old Ardee Road,
 - Deliver the first phase of a strategic link road through the site, as an extension of the Link Road from R178 Carrickmacross Road to R171 Old Ardee Road, to link to N52 to the south, providing a strategic link through not only the subject lands but also the Business and Technology Lands to the south, opening up those lands for development and investment.
 - The statutory 10% social housing requirement would automatically be delivered as part of this development, equating to circa 130 no. units. A specific objective can be implemented by way a specific objective for this particular site to deliver an increased quantum of social housing and/or an

element of affordable housing.

- Potential for the development to act as a catalyst for the new railway station to the south of Dundalk.
- Opportunity to deliver a significant public open space by way of a regional standard linear park, integrated with the retained trees and hedgerows, of a scale in excess of that normally required under the Development Plan (i.e. 15%).
- Upgrades to the R171 comprising of provision of improved footpath and cycleway facilities, improving linkages with Dundalk town centre.
- Provision of local and/or neighbourhood scale facilities such as retail, retail services and community facilities in conjunction with the new residential community.
- Delivery of educational facilities, such as childcare, primary and secondary schools to serve the new development and the wider community.

Infrastructure Assessment and Land Use Evaluation

- It is respectfully submitted that there are a number of anomalies in the infrastructure assessment and land use evaluation (attached at Appendix 2 of the Draft Development Plan). In summary, these issues are:
 - The infrastructure assessment and land use evaluation is not considered to accurately represent the suitability of the subject site.
 - A number of zoned lands have not been included in the infrastructure assessment and land use evaluation. The lands not included have therefore not been assessed in terms of their suitability for zoning.
 - The subject site is included within a much broader parcel of land (identified as Site 11) and this, it is respectfully submitted, distorts the scoring for the subject lands. It is considered that some western part of Site 11 would score significantly more poorly than the eastern part of Site 11. This distorts the potential that the eastern lands could have for development; and
 - The assessment appears to give equal weight to Blackrock and Dundalk town centres. This is not considered an appropriate approach, and rather the focus should be on development in proximity to Dundalk town centre.
- It is considered that a re-evaluation of the infrastructure assessment and land use evaluation will determine that the subject lands are suitable for development in policy terms.

Consideration under Tests in the Development Plan Guidelines

- It is considered that a key test in relation to the suitability of land for zoning is set out at Section 4.11 of the Development Plan Guidelines (June 2007). Whilst of some vintage, the tests set out in the Development Plan Guidelines are reinforced by the guiding principles of the NPF for housing. When examined against the criteria in the Development Plan Guidelines, the subject lands perform very strongly. This is assessed in detail in this submission, however the following is noted in particular:
 - The site is proximate to the town centre and associated services and facilities and is suitable for the controlled expansion of the town.
 - The Core Strategy of the Draft Louth County Development Plan 2021 - 2027 has clearly demonstrated the requirement for additional zoning for residential purposes, having regard to the higher-tiered policy requirements.
 - The subject site has significant strategic potential in terms of infrastructure, including contributing directly to the delivery of a strategic road link through the land, a new railway station to the south of Dundalk, and a significant linear park which has the potential to contribute in a major way to the green network in Dundalk and County Louth.
 - In infrastructure terms, Site 11 (of which the subject site forms part) of the infrastructure assessment and land use evaluation of the Draft Development Plan) is one of the 16 no. Tier 2 sites, and therefore scores as strongly as any other site in Dundalk in terms of infrastructure.
 - The site is of a generous size/scale and will, if appropriately zoned, deliver a planned and co-ordinated community which will include provision of local and/or neighbourhood scale facilities such as retail, retail services and community facilities in conjunction with the new residential community.
 - The site is relatively flat. It is located adjoining an existing road artery to the town centre, such road also containing existing water, foul water and surface water services. It is only a short distance to the railway station. The site is not prone to flooding, other than a small portion of the site to the north-west, which in any event would accommodate an access road (finished levels of which can avoid any flood risk). Whilst the site contains a number of important trees and hedgerows, this is seen as an opportunity for incorporating these features into a sustainable new development. The site is therefore inherently suitable in physical terms for development.
 - There are two national monuments on the subject lands. One of these, located towards the south-west portion of the site, is recorded as a 'rath' but does not appear on the grounds. The other is Killaly graveyard, to the extreme south-west corner of the site. Due to the fact of the location of the national monuments on a significant site, both can be retained, protected and incorporated into a sustainable development and do not in any way affect the potential of the lands to contribute to the planned and co-ordinated development of Dundalk.
 - The site contains relatively significant sections of trees and hedgerows. A

carefully considered development scheme could retain these existing features and integrate them into a network of open spaces on the site. This would have significant ecological and biodiversity benefits.

- Having regard to the above, it is respectfully submitted that the subject site is a prime site for zoning, in accordance with the test set out in the Development Plan Guidelines.

Recommendations for the Louth County Development Plan 2021 - 2027

- It is respectfully submitted that the subject lands are highly appropriate for residential development in the next Development Plan period, i.e. 2021 – 2027. It is submitted that the County Council should advance material amendments to the Draft Plan to facilitate the following:
 - (i) Amend the Draft Plan to change the ‘Strategic Reserve’ zoning on the subject lands to ‘A2 New Residential’. The portion of the subject lands zoned ‘H1 Open Space’ should be retained in that zoning.
 - (ii) Include an extension of the new Link Road from R178 Carrickmacross Road to R171 Old Ardee Road through the subject lands and extending south through the Business and Technology lands to the south to connect to the existing roundabout on the N52. This would require an amendment to both Table 7.4 of the Draft Plan, the associated text, and the maps.
 - (iii) Require that the extended link road be delivered as part of the first phase of development on the subject lands, insofar as it is contained within the subject lands.
 - (iv) Include specific objectives for the subject site, associated with the residential development, specifically:
 - a. Inclusion of 25% public open space to include a linear park
 - b. Reservation for a new railway station
 - c. Upgrades to the R171, to include improved footpath and cycle way connections to the Crescent in Dundalk town centre;
 - d. Delivery of education and community infrastructure to support a sustainable community at this location;
 - e. To require an additional 10% social and/or affordable be delivered on the site, in addition to the 10% social housing required under Part V of the Planning and Development Act 2000, as amended.

1.0 INTRODUCTION

- 1.1 On behalf of Mr Bill Baldwin, Murnaghan Brothers Ltd, and John and Patrick McParland, we wish to make a submission on the Draft Louth County Development Plan 2021-2027 in relation to the potential development of the three adjoining parcels of land under their ownership to the south west of the Dundalk Town Centre.
- 1.2 As will be set out in detail in the submission, it is our considered view that these three land parcels, proposed to be zoned as Strategic Land Reserve in the Draft Louth County Development Plan 2021-2027 are suitable for development for significant residential communities over the Development Plan period.
- 1.3 There are a number of key elements to this submission, specifically:
- (i) The subject lands are suitable for residential development in principle when examined against the tests set out in the relevant planning policy context, particularly the tests set out in the Development Plan Guidelines (2007);
 - (ii) The subject lands offer significant strategic potential, in terms of infrastructure, including contributing directly to the delivery of a strategic road link through the land, a new railway station to the south of Dundalk, and a significant linear park which has the potential to contribute in a major way to the green network in Dundalk and County Louth; and
 - (iii) There are certain anomalies in the infrastructure assessment and land use evaluation, both in a general sense and specifically in respect of the subject lands, which under emphasise the suitability of the subject lands for development in the next Development Plan period.
- 1.4 This submission is supported by a concept masterplan document which sets out how a residential community can be delivered at this location, and how there would be a number of significant public benefits delivered as part of such a development.
- 1.5 Having regard to the preceding sections, it is respectfully submitted that the subject lands are highly appropriate for residential development in the next Development Plan period, i.e. 2021 – 2027. In particular, the subject lands offer significant strategic potential, in terms of infrastructure, including contributing directly to the delivery of a strategic road link through the land, a new railway station to the south of Dundalk, and a significant linear park which has the potential to contribute in a major way to the green network in Dundalk and County Louth.
- 1.6 It is submitted that the County Council should advance material amendments to the Draft Plan to facilitate the following:
- (v) Amend the Draft Plan to amend the 'Strategic Reserve' zoning on the subject lands to 'A2 New Residential'. The portion of the subject lands zoned 'H1 Open Space' should be retained in that zoning.
 - (vi) Include an extension of the new Link Road from R178 Carrickmacross Road to R171 Old Ardee Road through the subject lands and extending south through the Business and Technology lands to the south to connect to the existing roundabout on the N52. This would require an amendment to both

Table 7.4 of the Draft Plan, the associated text, and the maps.

- (vii) Require that the extended link road be delivered as part of the first phase of development on the subjects, insofar as it is contained within the subject lands.
- (viii) Include specific objectives for the subject site, associated with the residential development, specifically:
 - a. Inclusion of 25% public open space to include a linear park
 - b. Reservation for a new railway station
 - c. Upgrades to the R171, to include improved footpath and cycle way connections to the Crescent in Dundalk town centre;
 - d. Delivery of education and community infrastructure to support a sustainable community at this location;
 - e. To require an additional 10% social and/or affordable be delivered on the site, in addition to the 10% social housing required under Part V of the Planning and Development Act 2000, as amended.

2.0 BASIS AND METHODOLOGY FOR SUBMISSION

2.1 In preparing this submission to promote the residential zoning of the subject lands, an objective assessment has been carried out based on the following methodology:

- (i) Review the subject site characteristics;
- (ii) Assess the potential benefits that a residential zoning on the subject site could deliver;
- (iii) Assess the relevant national, regional and local planning policy context (refer to Appendix 1);
- (iv) Critically assess the suitability of the subject site for zoning in accordance with the tests set out in relevant planning policy;
- (v) Seek to determine whether the subject lands are more sequentially preferable for zoning than other lands proposed to be zoned in the Draft Louth County Development Plan 2021 – 2027.

2.2 Based on the above, this submission is structured as follows:

- Section 3 provides an overview description of the site location and characteristics, and an outline of the provisions in the Draft Louth County Development Plan 2021 – 2027 that are applicable to the subject site;
- Section 4 provides an account of the benefits that a zoning on the site could deliver;
- Section 5 provides a review of and Commentary on the Draft Louth County Development Plan 2021 – 2027 Infrastructure Assessment and Land Use Evaluation;
- Section 6 sets out the suitability of the site for development, as assessed against relevant planning policy guidance;
- Section 7 provides a recommendation for amendments to the Draft Development Plan.

3.0 SUBJECT SITE

Description

- 3.1 As shown on Figure 3.1 below, the subject lands are located on and abut the south eastern boundary of Dundalk Town Centre. The Ardee Road, R171, runs along the northern boundary of these lands with direct access to Dundalk Town Centre at a distance of approximately 2 kilometres. This would be approx. 20 minutes' walk on the footpaths adjacent the R171 leading directly to the Dundalk Town Centre or a 5 minute cycle on the R171.
- 3.2 Dundalk is the largest town and administrative centre in the county. It has a population of approx. 40,000 and provides employment to 14,000. It is strategically placed on the Dublin to Belfast Economic Corridor and provides business and commuting connections south to the second largest town in the County, Drogheda, and Dublin and north to Newry and Belfast via the M1 and the railway line.

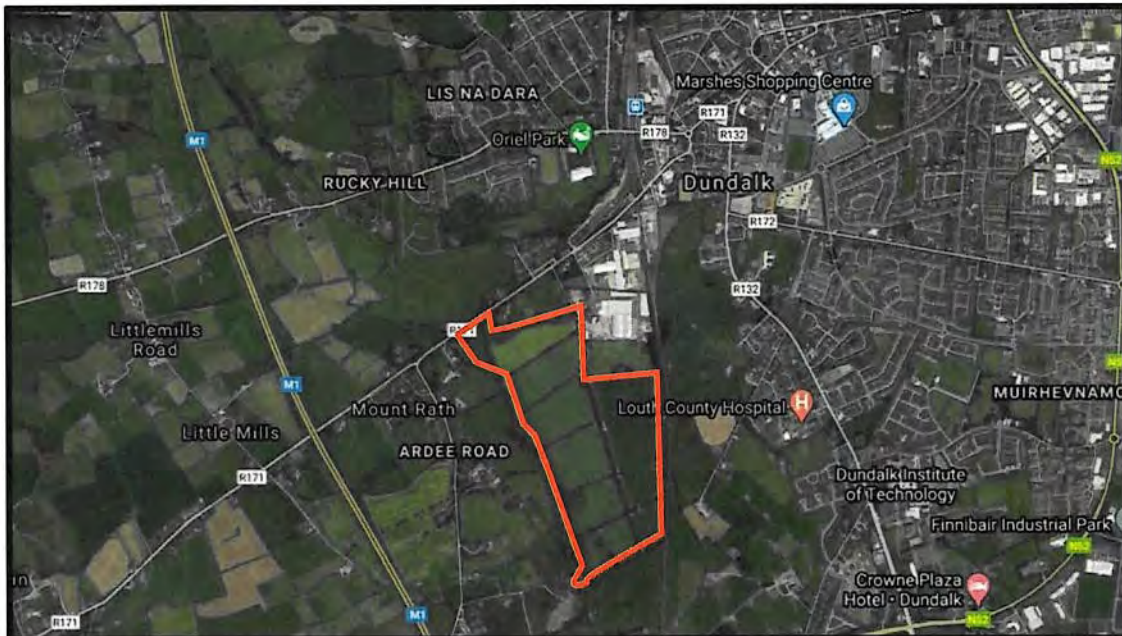


Figure 3.1: Site Location
Source: Google Maps

- 3.3 The railway line between Dundalk and Drogheda passes along the eastern boundary of the subject lands. There are two public transport links in close proximity to the subject lands. There is a bus stop (Grammar School, Stop 109521) approx. 1 km to the north east of the subject lands on the R171, which is 10 minutes by foot or 4 minutes by bike, providing connections between Dundalk and Ardee on the 167 Bus Éireann. 300 metres north from the Grammar School bus stop is the Dundalk Train Station for regional connections to Drogheda and Dublin to the south and international journeys to Newry and Belfast to the north.
- 3.4 There are a range of retail centres and service establishments and facilities within 1.5 / 2 km's of the subject lands on the southern entry to Dundalk Town Centre, such

as Tesco Extra, Lidl, the Marshes Shopping Centre, Dundalk Garda Station and An Post and schools, which include of Dundalk Grammar School, St Malachy's Girls National School, St Brigid's Special Needs School and the Redeemer Boys and Girls National School.

- 3.5 The subject lands, on their north western corner, are connected to Dundalk Town Centre by the Brewery Business Park, which contains a number of commercial and industrial companies, such as Dundalk Oil Products Limited, Hydroscond Ireland and Cargotec Ireland. Brookfield House residential property, shares the northern boundary and St John of God Respite Care Centre shares the north eastern boundary. There are no neighbouring properties adjoining the southern, eastern and western boundaries.
- 3.6 The three parcels of land are greenfield land in agricultural use. The three parcels are split up into 12 segments of land with mature trees, hedging and vegetation bordering the majority of these segments of land. The Killally Graveyard, reclaimed famine mortuary, forms part of the south western corner of the subject lands. The flooding assessment of this area, from the Strategic Flood Risk Assessment accompanying the Draft Louth County Development Plan 2021-2027, shows the parcel of land in the north west corner to have areas in flood zones, category A and B, meaning flood risk in this area is likely and requires management.

Subject Site in the Draft Louth County Development Plan 2021-2027

- 3.7 The subject three parcels of land are categorised L1 Strategic Reserve in the draft Louth County Development Plan 2021-2027. Refer to Figure 3.2 overleaf. These lands are reserved for the orderly expansion of Dundalk in the future and are considered generally not available until after the expiration of the draft plan period.
- 3.8 The basis of the Strategic Reserve categorisation for the subject lands derives from the Draft Plan's Infrastructure Assessment and Land Use Evaluation of all potential available residential development lands in Dundalk.
- 3.9 There is a linear strip of land in the centre of the subject land parcels and an area in the south west corner identified as H1 Open Space category in the Draft Plan.
- 3.10 The trees and cluster of trees on the subject lands are designated to be of Special Amenity Value in the Draft Plan.
- 3.11 Parts of north western section of subject lands and north eastern and eastern boundary are in both flood zone A and B that have been identified in the OPW Catchment Flood Risk Assessment and Management Study and the Strategic Flood Risk Assessment that accompanies the Draft Plan.

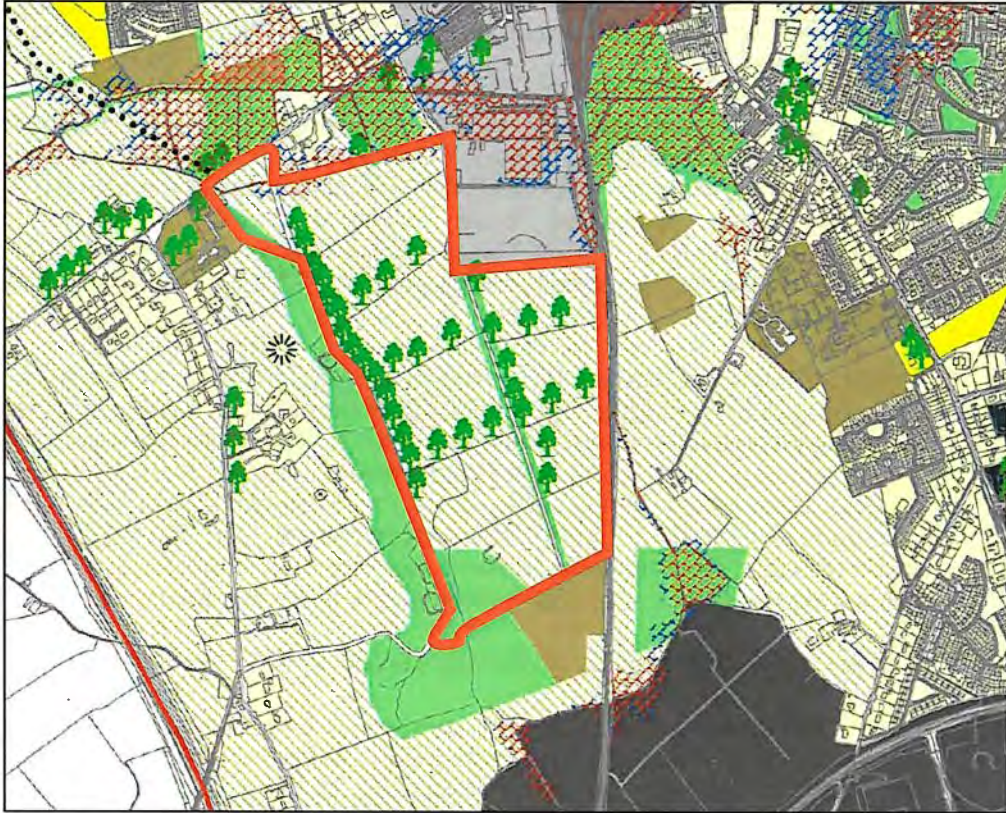


Figure 3.2: Extract from 'Composite Map' of the Draft Louth County Development Plan 2021 - 2027

4.0 BENEFITS OF PROPOSED RE-ZONING FOR RESIDENTIAL PURPOSES

- 4.1 This submission is supported by a concept masterplan document prepared by Henry J Lyons Architects which sets out how a residential community can be delivered at this location, and how there would be a number of significant public benefits delivered as part of such a development.
- 4.2 The Masterplan is enclosed at Appendix 2 of this submission. It is considered that, in addition to representing an appropriate site in itself for sustainable residential development, the subject site has significant strategic potential in terms of infrastructure, including contributing directly to the delivery of a strategic road link through the land, a new railway station to the south of Dundalk, and a significant linear park which has the potential to contribute in a major way to the green network in Dundalk and County Louth.

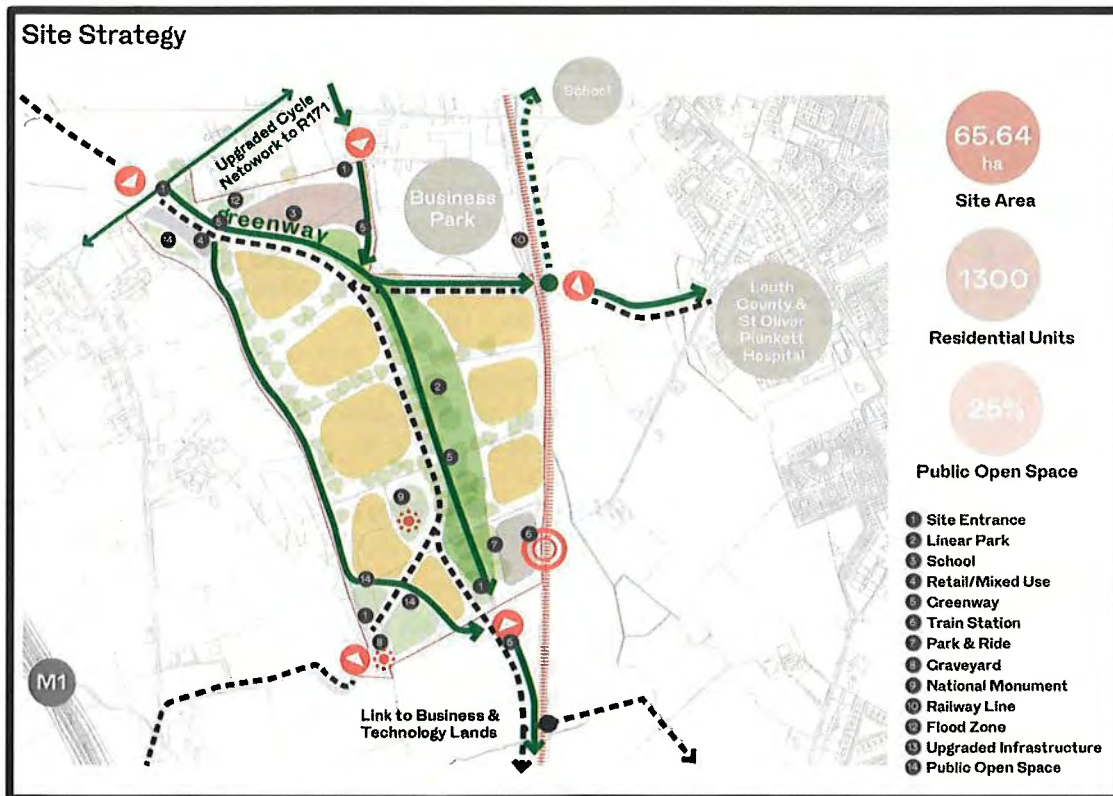


Figure 4.1: Extract from Masterplan

- 4.3 As indicated in the Masterplan, there are a number of significant planning benefits that can be delivered as part of development on this site. These are summarised below:

- Delivery of a planned and co-ordinated community of up to circa 1,300 no. new homes in a variety of typologies.
- Act as a key catalyst for the new Link Road from R178 Carrickmacross Road to R171 Old Ardee Road, which is identified at Table 7.4 (Key Road and Bridge

Projects) of the Draft Louth County Development Plan as a key project for Dundalk. Section 7.8.4 of the Draft Plan states that *“The delivery of these link roads will be developer driven and are likely to be constructed in sections”*. It is essential therefore that lands through which these roads travel, and lands to which they connect, are zoned for development.

- Furthermore, deliver the first phase of a strategic link road through the site, as an extension of the Link Road from R178 Carrickmacross Road to R171 Old Ardee Road, to link to N52 to the south, providing a strategic link through not only the subject lands but also the Business and Technology Lands to the south, opening up those lands for development and investment.
- The statutory 10% social housing requirement would automatically be delivered as part of this development, equating to circa 130 no. units.
- In addition to the statutory 10% social housing requirement pursuant to Part V of the Planning and Development Act 2000, as amended, implement a specific objective for this particular site to deliver an increased quantum of social housing and/or an element of affordable housing. The development is of a scale which could appropriately integrate additional social or affordable elements into an overall sustainable residential community.
- Potential for the development to act as a catalyst for the new railway station to the south of Dundalk. The site adjoins the existing railway line. Policy Objective MOV 14 of the Draft Plan seeks *“To secure, in co-operation with Iarnród Éireann, improved rail services for the mid and south Louth areas and in particular to seek to examine the feasibility of re-opening the rail station in Dunleer and providing additional new rail stations for south Dundalk, north Drogheda, and the mid-Louth area”*. There would be significant benefit to a railway station at this location, to serve the new development on the subject lands, as well as the ‘Business and Technology (E2)’ zoned lands to the south. There are various mechanism which could be progressed to assist the delivery of the railway station, such as:
 - (a) A special Development Contribution Scheme under Section 49 of the Planning and Development Act, 2000, as amended, to require developments to contribute to the cost of the delivery of the railway station; and/or
 - (b) Limit the quantum of development that can be occupied on site prior to the delivery of the railway station, or in the absence of alternative suitable public transport provision.
- Furthermore there is an opportunity to deliver a significant public open space by way of a regional standard linear park, integrated with the retained trees and hedgerows, of a scale in excess of that normally required under the Development Plan (i.e. 15%). A public open space of regional status at circa 25% of the site area would deliver an open space in region of 12.5 hectares. For comparison purposes, St. Stephen’s Green in Dublin is circa 9 hectares.
 - The site contains relatively significant sections of trees and hedgerows. A carefully considered development scheme could retain these existing features and integrate them into a network of open spaces on the site.

- This would have significant ecological and biodiversity benefits.
 Policy Objective SC 15 of the Draft Plan seeks “To facilitate and encourage open space areas and greenway corridors to be planned for on a multifunctional basis incorporating measures to promote and protect ecosystems, climate change measures and to incorporate key landscape features including archaeological considerations into their design”.



Figure 4.2: Artist's Impression of Significant Linear Park/Open Space on the Subject Lands

- Upgrades to the R171 comprising of provision of improved footpath and cycleway facilities, improving linkages with Dundalk town centre.
- Provision of local and/or neighbourhood scale facilities such as retail, retail services and community facilities in conjunction with the new residential community.
- Delivery of educational facilities, such as childcare, primary and secondary schools to serve the new development and the wider community.

5.0 REVIEW AND COMMENTARY ON THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 INFRASTRUCTURE ASSESSMENT AND LAND USE EVALUATION

Introduction

5.1 It is respectfully submitted that there are a number of anomalies in the infrastructure assessment and land use evaluation (attached at Appendix 2 of the Draft Development Plan).

5.2 The observer welcomes the approach of Louth County Council in terms of the infrastructure assessment and land use evaluation as an objective means of identifying the most appropriate lands for development over the plan period. However, we have a number of concerns in relation to the methodology undertaken in the assessment in relation to Dundalk. These are discussed below under the following headings:

- Site Selection and Range
- Infrastructure Assessment
- Land Use Evaluation

Site Selection and Range

5.3 The subject lands are located within 'Site 11' in the Dundalk Assessment.

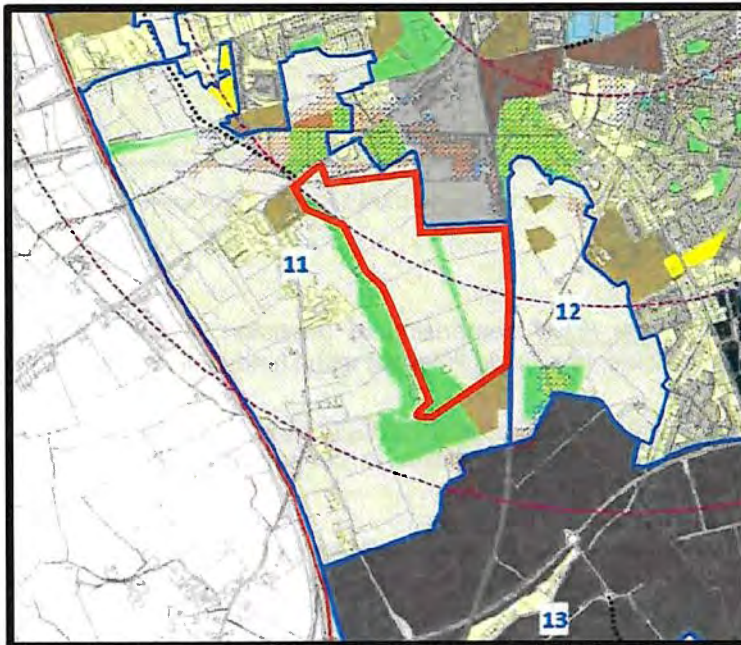


Figure 5.1: Site 11 and the Subject Site (outlined in red)

5.4 In the first instance, we wish to note that it is not clear to us why only 18 no. sites were examined. Section 1 of the infrastructure assessment and land use evaluation, under the heading of 'methodology', states that *"the assessment involved a review*

of undeveloped lands . . .”. No further description of the methodology for site selection is included. On review of Map 2, ‘Dundalk Tiered Assessment Map’, which identifies the 18 no. sites assessed, it is unclear why some sites have not been included in the assessment. In some cases, these sites are proposed to be zoned for development. In particular we note the following:

- (i) Tourism and Leisure zoning to the north-east of the town, adjoining the settlement boundary. Part of this zoning includes Dundalk Stadium, however the zoning extends significantly beyond that.

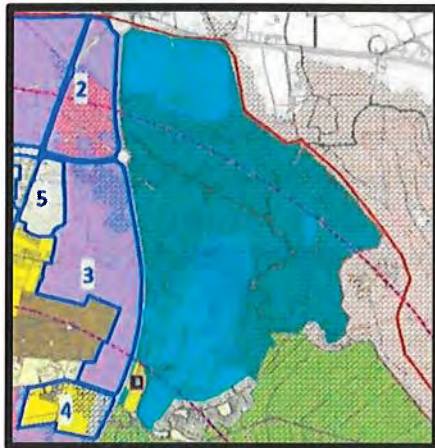


Figure 5.2: Tourism & Leisure Lands to the North-East of Dundalk

- (ii) General Employment zoning to the west of the town adjoining the M1.



Figure 5.3: General Employment Zoning to the West of Dundalk

- (iii) General Employment zoning to the south of the town, adjoining the settlement boundary along the Clermont Road. A small part of this zoning includes existing light industrial/employment uses, however there is additional land zoned beyond the existing uses.



Figure 5.4: General Employment Zoning to the South of Dundalk

- (iv) Neighbourhood Centre zoning to the south-west of the town, adjoining the settlement boundary.

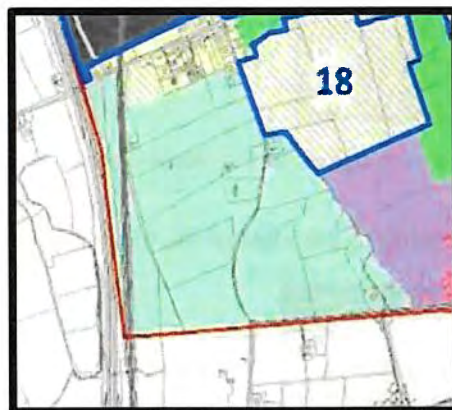


Figure 5.5: Neighbourhood Centre Zoning to the South-West of Dundalk

Infrastructure

- 5.5 Section 1.1.5 of the infrastructure assessment and land use evaluation, as attached at Appendix 2 of the Draft Development Plan, states that:

"In order for a parcel of land to be identified as 'Tier 1' there shall be no infrastructure impediments restricting the development of the lands i.e. all transportation and water services infrastructure needs to be in place. Sites which may require minor additional works or investment have also been identified as Tier 1 in certain circumstances. This is dependent on the nature and scale of the works required.

The identification of a site in Tier 2 highlights to landowners and potential investors that there are deficiencies in infrastructure that need to be addressed prior to the lands being developed. The nature of the deficiencies can vary between lands and settlements".

- 5.6 It is noted that none of the 18 no. sites assessed in Dundalk are allocated as Tier 1. 16 no. sites are Tier 2, and the remaining 2 no. sites are identified with a red dot, meaning that they are identified as 'Provision of infrastructure unlikely during the Plan period'. Site 11 is one of the 16 no. Tier 2 sites, and therefore scores as strongly as any other site in Dundalk in terms of infrastructure.
- 5.7 Below is an extract from the Draft Development Plan showing the basis for the infrastructure assessment for Site 11. Many of the 'traffic' items (left hand column) identified appear to relate to the R178. Whilst part of 'Site 11' extends to the R178, the subject land does not rely on the R178 for development. Rather, the subject site has direct access to the R171 to the north. Therefore, it is considered that the constraints noted in the table below would not affect the development of the subject lands as distinct from the development of 'Site 11'.
- 5.8 The following is also noted:
- It is accepted that the link road between the R178 and the R171 would assist with facilitating development at this location. The development of the subject lands could act as a catalyst for this link road – the access to the subject lands on the R171 is located directly adjacent to where the proposed link road would connect to the R171.
 - The proposed development could directly deliver some, and contribute to the cost of the remainder of, upgrade works required to the R171.

Site 11	Footpath and Cycleway along R178	Can service part of the site, future upgrades would be needed. Drainage Area Plan to address. Dependent on size of development
	Construction of the R178 (Carrickmacross Road to the R171) (Old Ardee Road) Link Road c.0.8km in length.	
	McEntee / R178 junction upgrade	
	Traffic Calming over 800m along the R178	
	Traffic calming along the R171 Ardee Road	
	Upgrade Ardee Road / Haggardstown Road junction	
	On street cycleway along the Ardee Road	

Figure 5.6: Extract from Infrastructure Assessment of the Draft Louth County Development Plan 2021 - 2027

Land Use

- 5.9 Whilst the infrastructure assessment and land use evaluation is considered to be an entirely appropriate mechanism for determining the appropriateness of land for zoning to facilitate future development, it is respectfully submitted that the 'sites' assessed are of a significant size and a more granular level approach would be appropriate.
- 5.10 For example, the subject site (i.e. the site subject to this submission) is the easternmost land included in 'Site 11' and due to the fact that 'Site 11' is of such a large size, the subject site by association scores more poorly than it should in relation to 'proximity to the town centre', as well as other criteria. 'Site 11' scores '5' (the worst score achievable in the 'proximity to town centre' category). This is despite the fact that from 'Market Square' in Dundalk to the northern point of the subject site is only 2 kilometres (a 20 minute walk). Some parts of Site 11 are significantly in excess of this.
- 5.11 By contrast, 'Site 15', located a circa 4.6 kilometre travel distance to the south of 'Market Square' scores '3' under the 'proximity to the town centre' category, presumably due to its location within the catchment of Blackrock. Blackrock is a satellite settlement in an out of centre location. It is not a town centre in the same way as Dundalk. It is misleading to allocate the same weighting to Blackrock town centre as to Dundalk town centre. 'Site 16' is marked in a similar way, scoring a '4' on account of its location within the Blackrock catchment. Similarly, 'Site 9' scores a '4' in the same category, despite being a similar distance (circa 2km) from 'Market Square' at its closest point, i.e. it's south-west corner. Parts of Site 9 extend well beyond 2 kilometres from Market Square.
- 5.12 The figure below is an extract of the scoring matrix as included in the Draft Development Plan.

Settlement - Dundalk																			
Tiered Assessment Analysis																			
Land Use	EMP	EMP	EMP	RES	SR	SR	SR	EMP	RES	SR	SR	SR	SR	BT+RES	MU	RES	RES/SR	SR	SR
Infrastructure Type	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7	Site 8	Site 9	Site 10	Site 11	Site 12	Site 13	Site 14	Site 15	Site 16	Site 17	Site 18	
Roads	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
Footpath	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
Public Lighting	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
Water	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
Wastewater	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
Tier 1 or Tier 2	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
Land Use Evaluation																			
Proximity to Town Centre	5	5	5	5	5	5	5	5	4	5	5	5	5	5	3	4	5	5	
Contribute to Consolidated/compact growth	4	4	4	4	4	4	5	4	2	5	3	4	4	4	4	4	5	5	
Proximity to shops and services	3	3	3	3	3	3	5	3	3	5	4	3	2	2	4	4	4	4	
Proximity to schools	N/A	N/A	N/A	4	4	4	5	N/A	2	4	4	N/A	N/A	4	4	3	3		
Infill/Backland	5	5	5	5	5	5	5	4	3	5	5	5	4	4	5	5	5		
Availability to public transport	3	3	3	3	4	4	5	3	3	1	3	3	4	4	4	5	5		
Flooding	1	4	4	4	1	1	1	4	1	1	1	1	1	1	3	3	1	1	
Total	21	24	24	28	26	26	31	23	12	26	5	21	20	24	28	28	28		

Figure 5.7: Tiered Assessment Analysis of the Draft Louth County Development Plan 2021 - 2027

5.13 Having regard to the above, it is submitted that the subject lands should be a site in their own right in the infrastructure assessment and land use evaluation. In the event that this were the case, it is respectfully submitted that the site would score as follows:

Criteria	Site 11	Description
Proximity to town centre	4	The site is circa 2 kilometres from the centre of Dundalk (at Market Square). This is equivalent to a 20 minute walk or an 5 minute cycle. Only Sites 4, 15 and 16 scored anything other than a '5' under this criteria. Whilst within the catchment of Blackrock, sites 15 and 16 are more peripheral than the subject site to Dundalk town centre. Blackrock should not have the same pull or weight as Dundalk town centre.
Contribute to consolidated/compact growth	3	The subject site is an edge of centre location, adjoining lands zoned for 'Transportation Development Hub'. Whilst there is undeveloped land to the east (Site 12), the subject site is already well connected with and related to the built up area of Dundalk. The development of the subject site has the potential to contribute to consolidated and co-ordinated growth.

Proximity to shops and services	3	The site is circa 2 kilometres from the centre of Dundalk (at Market Square). This is equivalent to a 20 minute walk or an 5 minute cycle. The site is therefore easily accessible to Dundalk town centre.
Proximity to schools	3	Being close to Dundalk town centre, the subject site is also close to a significant number of schools, most notably Dundalk Grammar School which is a circa 1 kilometre travel distance and Louth Mixed National School, approximately a 1.2 kilometre travel distance
Infill/Backland	5	Score as per the Draft Development Plan maintained
Availability to public transport	1	Score as per the Draft Development Plan maintained
Flooding	1	Score as per the Draft Development Plan maintained
Total	20	

Figure 5.8: Analysis of Land Use Scoring for the Subject Lands

- 5.14 It is noted that the highest scoring site in the evaluation which is zoned or partly zoned for residential development (other than Strategic Reserve) are Site 4 (zoned Residential) and Site 16 (zoned part Residential, part Strategic Reserve) both at 28 points, followed by Site 15 (zoned Residential) at 24 points. It is a curiosity as to why both Sites 4 and 16 score more poorly than Site 11, yet they still have a proposed 'Residential' zoning. This is not addressed in the land use evaluation in any way. In fact, it is compounded by the fact that Site 11 performs more strongly than both Sites 4 and 15 in terms of infrastructure.

Summary and Conclusion

- 5.15 Having regard to the above, it is respectfully submitted that Louth County Council should consider:
- (i) A comprehensive review of all existing undeveloped zoned land within Dundalk to ensure that all zoned lands are assessed in the infrastructure and land use evaluation;
 - (ii) In respect of Site 11, reconsider the extent of this site. Site 11 is a significant extent of land and it is considered that some western part of Site 11 would score more poorly than the eastern part of Site 11. This distorts the potential that the eastern lands could have for development; and
 - (iii) Re-examine the weighting system in the land use evaluation, which currently appears to give equal weight to Blackrock and Dundalk town centres. This is not considered an appropriate approach, and rather the focus should be on development in proximity to Dundalk town centre.

- 5.16 It is considered that the carrying out of the steps outlined above would result in the subject lands being identified as being suitable for zoning for residential development in the Louth County Development Plan 2021 – 2027.

6.0 SUITABILITY OF SUBJECT LANDS FOR DEVELOPMENT

Introduction

6.1 A key determinant, and first step, as to whether a particular site is suitable for zoning is whether or not that land exhibits certain key characteristics.

6.2 In terms of guiding principles, Section 6.6 of the National Planning Framework (NPF) states the following:

- *“Prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.*
- *Tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.*
- *Integrate housing strategies where settlements straddle boundaries (county and/ or regional).*
- *Utilise existing housing stock as a means to meeting future demand”.*

6.3 It is considered that a key test in relation to the suitability of land for zoning is set out at Section 4.11 of the Development Plan Guidelines (June 2007). Whilst of some vintage, the tests set out in the Development Plan Guidelines are reinforced by the guiding principles of the NPF for housing, as set out above.

6.4 Paragraph 4.11 of the Guidelines states that:

“Under Section 95 (1) of the Act, planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of residential land does not occur at any time during the period of the plan. The Part V Housing Supply Guidelines set out how planning authorities can meet their obligations in this regard”.

6.5 We concentrate here on the suitability of the subject lands for zoning for residential development. In this regard, Paragraph 4.12 of the Guidelines states:

“In addition to the above, when considering the suitability of specific lands for development, within the process of preparing zoning objectives in making a development plan, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates, statutory obligations and Government policy. Matters typically relevant to the proper planning and sustainable development of areas, inter alia, include:

- *Need*
- *Policy Context*
- *Capacity of Water, Drainage and Roads Infrastructure*
- *Supporting Infrastructure and Facilities*
- *Physical Suitability*

- *Sequential Approach*
- *Environmental and Heritage policy, including conservation of habitats and other sensitive areas”.*

6.6 A detailed description of each of these headings is provided in the Guidelines, and is included at Appendix 1 of this submission for convenience of reference.

6.7 Set out below is an assessment of the subject site under each criteria.

Assessment under Development Plan Guidelines Criteria

Need

6.8 The need for additional zoning has clearly been established in the Core Strategy of the Draft Development Plan. Some of the key findings are as follows:

- At present, Dundalk and Drogheda combined have a population share of 56.7% of the County’s population (Table 2.6 of the Draft Louth County Development Plan 2021 – 2027).
- The NPF’s Implementation Roadmap provides that Louth’s projected population, in conjunction with the permitted 25% headroom, will be in the range of 141,500-148,375 persons by 2026 (Section 2.5.3 of the Draft Louth County Development Plan 2021 – 2027). Using the higher projected growth rate and factoring into the equation that this Plan runs from 2021 to 2027, the population projection for the County in 2027 is 149,966 persons, representing an increase in population of 21,082 on the 2016 Census figure (see Table 2.8 of the Draft Louth County Development Plan 2021 – 2027).
- Section 2.5.4 of the Draft Louth County Development Plan 2021 – 2027 states that the bulk of the projected population and household growth in County Louth is directed to the RGC’s of Drogheda and Dundalk (69%) in accordance with the principal objectives of the NPF, RSES and as provided for in the Settlement Hierarchy. It is further acknowledged that reversing the trend of combined population growth occurring in the lower tier towns, villages and open countryside is necessary.
- To achieve the objective stated above, the Draft Louth County Development Plan 2021 – 2027 provides for 69% of the projected population growth to be targeted to Drogheda and Dundalk and 8.7% to Ardee and Dunleer, the residual 22% of projected population will be allocated to the remaining settlements including Self Sustaining Towns, Towns and Villages and the Rural Area. As indicated then in Table 2.9 of the Draft Plan, 36.3% of the 69% is to be allocated to Dundalk, and 32.8% to Drogheda.
- The bulk of the projected population and household growth in County Louth is directed to the RGC’s of Drogheda and Dundalk (69%) in accordance with the principal objectives of the NPF, RSES and as provided for in the Settlement Hierarchy. It is consistent with reaching a population of 50,000 in each of the towns by 2031 as set out in the RSES and supports consolidated development in these large centres to facilitate economic growth and broaden the employment base.

- Table 2.14 of the Draft Plan then identifies the following for Dundalk:

Housing Allocation 2021-2027:
2,606

Lands with potential to deliver Infill or Brownfield Development (ha):
30

Units delivered on Infill/ Brownfield Lands:
1,743

Total Lands Zoned for New Residential uses (ha):
269

- The Core Strategy has therefore clearly demonstrated the requirement for additional zoning for residential purposes, having regard to the higher-tiered policy requirements.

Policy Context

6.9 The amount of land to be zoned has been addressed above under the 'need' heading.

6.10 As to the location of the land to be zoned, it is respectfully submitted that the subject lands are sequentially preferable for zoning. The reasons for this are explained in detail in this submission and are summarized as follows:

- The subject site has significant strategic potential in terms of infrastructure, including contributing directly to the delivery of a strategic road link through the land, a new railway station to the south of Dundalk, and a significant linear park which has the potential to contribute in a major way to the green network in Dundalk and County Louth.
- The infrastructure assessment and land use evaluation as attached at Appendix 2 of the Draft Louth County Development Plan 2021 – 2027 is not considered to accurately represent the suitability of the subject site. In particular:
 - A number of zoned lands have not been included in the infrastructure assessment and land use evaluation.
 - In infrastructure terms, Site 11 (of which the subject site forms part) is one of the 16 no. Tier 2 sites, and therefore scores as strongly as any other site in Dundalk in terms of infrastructure.
 - The subject site is included within a much broader parcel of land (identified as Site 11) and this, it is respectfully submitted, distorts the scoring for the subject lands. It is considered that some western part of Site 11 would score significantly more poorly than the eastern part of Site 11. This distorts the potential that the eastern lands could have for development; and

- (iv) The assessment appears to give equal weight to Blackrock and Dundalk town centres. This is not considered an appropriate approach, and rather the focus should be on development in proximity to Dundalk town centre.

- 6.11 It is considered that a re-evaluation of the infrastructure assessment and land use evaluation will determine that the subject lands are suitable for development in policy terms.
- 6.12 Having regard to the above, it is considered that a revision is required to the Draft Plan to make it consistent with the policy requirements of the Development Plan Guidelines.

Capacity of Water, Drainage and Roads Infrastructure

- 6.13 The Guidelines state that (at paragraph 4.16):

“When making decisions to zone land, regard must be had to the existing and future availability of, or the capacity to provide, infrastructure. Where services are not available, there should be a reasonable expectation of their being provided in the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure, within the plan period or a reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development.”

- 6.14 As stated above, in infrastructure terms, Site 11 (of which the subject site forms part) of the infrastructure assessment and land use evaluation of the Draft Development Plan) is one of the 16 no. Tier 2 sites, and therefore scores as strongly as any other site in Dundalk in terms of infrastructure.

Supporting Infrastructure and Facilities

- 6.15 The Guidelines state that (at paragraph 4.17):

“Consideration must be given to the future availability of, or the capacity to provide, supporting infrastructure, such as community facilities, health-care, schools, public open space, retail and other service provision and public transport when allocating land for development. There should be a reasonable expectation that these can be delivered in the lifespan of the plan. The nature of the proposed land-use and the extent of zoning designation will determine what facilities are necessary, when and to what scale. Also, regard should be had to the outcome of the current review and updating of the 1999 Residential Density Guidelines, wherein there will be a central focus on delivering integrated, quality new developments which facilitate sustainable communities.”

- 6.16 The site is of a generous size/scale and will, if appropriately zoned, deliver a planned and co-ordinated community which will include provision of local and/or neighbourhood scale facilities such as retail, retail services and community facilities in conjunction with the new residential community. The link that the development of the site would have to critical infrastructure, specifically the key link road (the new Link Road from R178 Carrickmacross Road to R171 Old Ardee Road extended

through the subject lands and extending south through the Business and Technology lands to the south to connect to the existing roundabout on the N52) and the railway station, mean that the subject site is key to the release of this infrastructure.

- 6.17 The delivery of this infrastructure, along with other infrastructure described elsewhere in this submission, would be directly triggered by the development of these lands.

Physical Suitability

- 6.18 The site is relatively flat. It is located adjoining an existing road artery to the town centre, such road also containing existing water, foul water and surface water services. It is only a short distance to the railway station.
- 6.19 The site is not prone to flooding, other than a small portion of the site to the north-west, which in any event would accommodate an access road (finished levels of which can avoid any flood risk).
- 6.20 Whilst the site contains a number of important trees and hedgerows, this is seen as an opportunity for incorporating these features into a sustainable new development.
- 6.21 The site is therefore inherently suitable in physical terms for development.

Sequential Approach

- 6.22 The Guidelines state that (at paragraph 4.19):

"In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan".

- 6.23 Dundalk Town Centre is approximately 2 kilometres from the site. This would be approx. 20 minutes' walk on the footpaths adjacent the R171 leading directly to the Dundalk Town Centre or a 5 minute cycle on the R171.
- 6.24 There are two key public transport links in close proximity to the subject lands. There is a bus stop (Grammar School, Stop 109521) approx. 1 km to the north east of the subject lands on the R171, which is 10 minutes by foot or 4 minutes by bike, providing connections between Dundalk and Ardee on the 167 Bus Éireann. 300 metres north from the Grammar School bus stop is the Dundalk Train Station for regional connections to Drogheda and Dublin to the south and international journeys to Newry and Belfast to the north.

- 6.25 There are a range of retail centres and service establishments and facilities within 1.5 / 2 km's of the subject lands on the southern entry to Dundalk Town Centre, such as Tesco Extra, Lidl, the Marshes Shopping Centre, Dundalk Garda Station and An Post and schools, which include of Dundalk Grammar School, St Malachy's Girls National School, St Brigid's Special Needs School and the Redeemer Boys and Girls National School.
- 6.26 The site is therefore proximate to the town centre and associated services and facilities and is suitable for the controlled expansion of the town.
- 6.27 The issue of proximity to the town centre and contribution to consolidated growth is addressed as part of the infrastructure assessment and land use evaluation as attached at Appendix 2 of the Draft Louth County Development Plan 2021 – 2027.
- 6.28 Whilst the principle of the assessment approach at Appendix 2 of the Draft Plan is welcomed, as set out at Section 5 of this submission, it is respectfully submitted that the 'sites' assessed are of a significant size and a more granular level approach would be appropriate. This leads to a poor score under some criteria (including proximity to the town centre and contribution to consolidated growth) where in fact the subject lands should score more positively. The following is noted in particular:
- The subject site (i.e. the site subject to this submission) is the easternmost land included in 'Site 11' and due to the fact that 'Site 11' is of such a large size, the subject site by association scores more poorly than it should in relation to 'proximity to the town centre', as well as other criteria. 'Site 11' scores '5' (the worst score achievable in the 'proximity to town centre' category). This is despite the fact that from 'Market Square' in Dundalk to the northern point of the subject site is only 2 kilometres (a 20 minute walk / 5 minute cycle). Some parts of Site 11 are significantly in excess of this.
 - By contrast, 'Site 15', located a circa 4.6 kilometre travel distance to the south of 'Market Square' scores '3' under the 'proximity to the town centre' category, presumably due to its location within the catchment of Blackrock. Blackrock is a satellite settlement in an out of centre location. It is not a town centre in the same way as Dundalk. It is misleading to allocate the same weighting to Blackrock town centre as to Dundalk town centre. 'Site 16' is marked in a similar way, scoring a '4' on account of its location within the Blackrock catchment. Similarly, 'Site 9' scores a '4' in the same category, despite being a similar distance (circa 2km) from 'Market Square' at its closest point, i.e. it's south-west corner. Parts of Site 9 extend well beyond 2 kilometres from Market Square.

Environmental and Heritage policy, including conservation of habitats and other sensitive areas

- 6.29 There are two national monuments on the subject lands. One of these, located towards the south-west portion of the site, is recorded as a 'rath' but does not appear on the grounds. The other is Killaly graveyard, to the extreme south-west corner of the site. Due to the fact of the location of the national monuments on a significant site, both can be retained, protected and incorporated into a sustainable

development and do not in any way affect the potential of the lands to contribute to the planned and co-ordinated development of Dundalk.

- 6.30 The site also contains relatively significant sections of trees and hedgerows. A carefully considered development scheme could retain these existing features and integrate them into a network of open spaces on the site. This would have significant ecological and biodiversity benefits.

Summary and Conclusion

- 6.31 Having regard to the above, it is respectfully submitted that the subject site is a prime site for zoning, in accordance with the test set out in the Development Plan Guidelines.

7.0 RECOMMENDATIONS FOR THE LOUTH COUNTY DEVELOPMENT PLAN 2021 – 2027

7.1 Having regard to the preceding sections, it is respectfully submitted that the subject lands are highly appropriate for residential development in the next Development Plan period, i.e. 2021 – 2027. In particular, The subject lands offer significant strategic potential, in terms of infrastructure, including contributing directly to the delivery of a strategic road link through the land, a new railway station to the south of Dundalk, and a significant linear park which has the potential to contribute in a major way to the green network in Dundalk and County Louth.

7.2 It is submitted that the County Council should advance material amendments to the Draft Plan to facilitate the following:

- (ix) Amend the Draft Plan to change the 'Strategic Reserve' zoning on the subject lands to 'A2 New Residential'. The portion of the subject lands zoned 'H1 Open Space' should be retained in that zoning.
- (x) Include an extension of the new Link Road from R178 Carrickmacross Road to R171 Old Ardee Road through the subject lands and extending south through the Business and Technology lands to the south to connect to the existing roundabout on the N52. This would require an amendment to both Table 7.4 of the Draft Plan, the associated text, and the maps.
- (xi) Require that the extended link road be delivered as part of the first phase of development on the subject lands, insofar as it is contained within the subject lands.
- (xii) Include specific objectives for the subject site, associated with the residential development, specifically:
 - a. Inclusion of 25% public open space to include a linear park
 - b. Reservation for a new railway station
 - c. Upgrades to the R171, to include improved footpath and cycle way connections to the Crescent in Dundalk town centre;
 - d. Delivery of education and community infrastructure to support a sustainable community at this location;
 - e. To require an additional 10% social and/or affordable be delivered on the site, in addition to the 10% social housing required under Part V of the Planning and Development Act 2000, as amended.



APPENDIX 1 – SECTION 4.12 OF THE DEVELOPMENT PLAN GUIDELINES (JUNE 2007)

4.12 In addition to the above, when considering the suitability of specific lands for development, within the process of preparing zoning objectives in making a development plan, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates, statutory obligations and Government policy. Matters typically relevant to the proper planning and sustainable development of areas, *inter alia*, include:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

(a) Need

4.13 The amount of land to be zoned for any particular land-use must be clearly based on, and justified by, a realistic assessment of need. The survey and analysis stage of plan preparation should provide the baseline data to determine future land requirements. A number of factors need to be taken into consideration when determining the location and quantity of land to be zoned. The Regional Planning Guidelines provide regional population growth and target projections. The assessment of need for additional residential land will be set out in the local authority's housing strategy and calculated in accordance with the recommendations of the Housing Supply Guidelines.

With regard to other land-uses, it will be necessary to estimate likely future requirements based on past trends, outstanding planning permissions, expected take-up rates, availability of suitable services and infrastructure, projected population levels and economic context. This process should assess the capacity of existing built-up areas to accommodate additional development, either by facilitating increased density or by securing redevelopment of areas in need of renewal. As has been noted, land is a finite resource. It is important therefore to ensure its efficient use by maximising the re-use of previously developed land and the conversion and re-use of existing buildings.

4.14 Planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect. In relation to uses other than residential, planning authorities should endeavour to make reasonable and logical estimates of anticipated needs and zone sufficient land to meet such needs. In the case of all zoning of land, the location of such lands, particularly in the case of residential, should also take account of the location policies in section 5.3 of the NSS. The demands of individual landowners should not distort the preferred amount and location of lands to be zoned. Regard must also be had to section 10 (8) of the Act, which states that there can be no presumption that any land zoned in a particular development plan will remain so zoned in any future development plan.

(b) Policy Context

4.15 Both the amount of land to be zoned for development and the proposed location of that land will also need to be influenced by other plans and strategies, from national and regional to local levels so that local authorities play their full part in supporting the implementation of those national and regional strategies. Particular regard must be had to the National Spatial Strategy (particularly section 5.3 of the NSS which details the housing development issues), Regional Planning Guidelines and the infrastructure plans and programmes of State and semi-state bodies. In addition, regard must be had to any other relevant guidelines and directives, including those listed in Appendix A.

(c) Water, Drainage and Roads Infrastructure

4.16 When making decisions to zone land, regard must be had to the existing and future availability of, or the capacity to provide, infrastructure. Where services are not available, there should be a reasonable expectation of their being provided in the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure, within the plan period or a reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development.

(d) Supporting Infrastructure and facilities

4.17 Consideration must be given to the future availability of, or the capacity to provide, supporting infrastructure, such as community facilities, health-care, schools, public open space, retail and other service provision and public transport when allocating land for development. There should be a reasonable expectation that these can be delivered in the lifespan of the plan. The nature of the proposed land-use and the extent of zoning designation will determine what facilities are necessary, when and to what scale. Also, regard should be had to the outcome of the current review and updating of the 1999 Residential Density Guidelines, wherein there will be a central focus on delivering integrated, quality new developments which facilitate sustainable communities.

(e) Physical Suitability

4.18 The development plan should strive to ensure that the form and location of new development offers the best "value for money" in terms of efficient use of existing infrastructure, while minimising the need for costly new infrastructure. Where land in green-field locations is to be zoned, account should be taken, in considering the different options available, of the land's capacity for development by way of the most cost effective means of providing the necessary infrastructure. An example in this regard would include lands for housing development giving rise to costs arising from pumping of wastewater where other lands could be developed in the vicinity on a gravity-based drainage system. It is also vitally important to take account of the physical suitability of lands for development, notably lands subject to, or with potential impacts on, flood risks. Further guidance on this issue is contained at Appendix E.

(f) Sequential Approach

4.19 In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development: (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being

given preference (i.e. 'leapfrogging' to more remote areas should be avoided); (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan.

(g) Heritage Policy 4.20

Zoning should take account of built and natural heritage designations. See mandatory objectives 3 and 6 below.



APPENDIX 2 – PLANNING POLICY ASSESSMENT

Suitability of Developing the Subject Lands in the Context of National Planning Framework 2018

The National Planning Framework introduces a policy shift whereby the focus of new development needs to be within existing settlements rather than sprawling out into the countryside. The NPF sets a target for at least 40% of all new housing development should be within or close to the existing built form of cities and towns. This type of compact growth in residential development will allow towns to evolve sustainably and be attractive places for people to live near jobs and services and facilities.

The NPF notes the benefits of more compact urban development will have on the environment by:

- Reducing large development land accumulation which will, in some cases, preserve prime agriculture lands and rich habitats;
- Utilising existing infrastructure and reducing the need to travel long distances, reducing energy consumption and carbon emissions;
- Improving the viability of public transport services / facilities, and
- Enhancing public health by encouraging and facilitating active lifestyles in a more walkable and cycle friendly urban environment.

The NPF's preference for where future homes in Ireland will be located and how they will be delivered are:

- In places which supports growth, can provide infrastructure efficiently, are accessible by a range of local services and encourage use of public transport, walking and cycling to reduce CO2 emissions, and
- In Larger towns (where large scale housing demand exists) where homes and supporting services can be delivered efficiently which will ease pressure on the States revenue reserve in the long run.

In order to address the deficit in national housing provision that has built up since 2010 and to meet projected population and economic growth, annual housing output will need to increase to 30,000 to 35,000 per annum to 2027.

Dundalk forms part of the Dublin to Belfast Economic Corridor which is the largest national and international economic agglomeration on the Island of Ireland. It links the two largest cities and towns on the island of Ireland through road and national rail links supporting economic growth and competitiveness, on a regional, national and international level. The Corridor is also a national entry to major ports and airports, such as Dublin Airport, Belfast International Airport and Belfast City Airport.

To capitalise on the continued economic potential of this international corridor, the Government supports the effective planning and development of the main centres of population and economic growth on the corridor path, such as Dundalk.

The development of the subject lands, which adjoin and connect to the Dundalk Town Centre, will encourage more sustainable modes of travel and will cater for forecasted population and employment growth in the Dublin to Belfast Economic Corridor.

Suitability of Developing the Subject Lands in the Context of the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031

Similar to the NPF the EMRA RSES targets a greater proportion of future housing development (30%-40%) to be within or close to built-up areas in Ireland. This compact and urban growth is directed to Regional Growth Centres that can effectively support significant population and economic growth, such as Dundalk with its high level of self-sustaining employment and services. The RSES has set a target population in Dundalk to exceed 50,000 by 2031. The RSES identifies Dundalk as one of the fastest growing towns in the country and promotes its sustainable and compact growth to city scale. Central to this sustainable and compact growth would be facilitating urban expansions in Dundalk, such as the Mount Avenue masterplan lands and other lands. The emphasis for the majority of housing to be provided in defined settlements at appropriate housing and tenure typologies needs to be pursued in urban areas across the country, such as Dundalk.

The RSES, in the same way as the NPF, pays regard to the importance of the Dublin to Belfast Economic Corridor. There are a number of factors that will enable this corridor to prosper. Examples include:

- Compact and focused growth of the Regional Growth Centres to city scale, such as Dundalk;
- Drive the link between Dundalk and Newry for cross border synergy in services and functions and their protection, especially post Brexit, and
- Improve access to rail, road and communications between Dublin and Belfast.

The Dublin to Belfast Corridor is a significant spine connecting the two largest cities on the Island of Ireland via the regional centres of Drogheda, Dundalk and Newry. The assimilation of Drogheda, Dundalk and Newry provides a valuable growth network for cross-boundary interlinked regional development.

The development of the subject lands, which adjoin and connect to the Dundalk Town Centre, will encourage more sustainable modes of travel and will cater for forecasted population and employment growth in the Dublin to Belfast Economic Corridor.

Existing Local Policy and Zoning Objectives of the Subject Lands

To understand the evolution of the proposed zoning requirements in the Draft Louth County Development Plan 2021-2027 for the subject lands and to inform the masterplan concept design of the subject lands, it is necessary to outline the existing zoning context for these subject lands in the Dundalk and Environs Development Plan 2009-2015.

The Dundalk and Environs Development Plans 2009-2015, adopted in July 2011 and subject of 3 number of variations, remains the current development plan for Dundalk in conjunction with the Louth County Development Plan 2015-2021. The Louth County Development Plan 2015-2021 is an over-arching strategic framework document for entire county. It has been subject to 2 number of variations.

The subject lands are zoned Residential 2, have a new and improved road network passing through the northern sections of all three parcels of land, contain a linear strip of recreational, amenity and open space area in centre and north west corner and the south west corner of the land parcels (Note: the minimum public open space requirement percentage of the gross site area in the Louth County Development Plan 2015-2021 is 15%). The subject lands are bordered by a recreational, amenity and open space area and a transportation development hub at its northern boundary, recreational amenity and open space along its western

boundary and community, education and recreation and civic and community centre at its southern boundary. The subject lands eastern boundary is also bordered by Residential 2.

When the first variation of the Dundalk and Environs Development Plan was adopted, in August 2011, the subject lands were zoned Phase 3 and the Residential 2 and the open space areas were retained. A proposed cycle route was included on the R171 along the northern boundary of the northern land parcel.

Residential 2 lands are to provide for new residential communities and supporting community facilities, subject to the availability of services and therefore have a lower priority compared to Residential 1 lands which have access to services and are prioritised over un-serviced lands.

It is envisaged that Phase 1 lands would accommodate housing during the lifetime of the Development Plan (up to 2015) and following this, Phase 2 and 3 would subsequently be developed. In accordance with policy CS2 of the Dundalk and Environs Development Plan 2009-2015 (Variation No. 1) Core Strategy, *'Only on the completion of the development of 75%...'* of Phase 1 lands, *'...shall subsequent phasing be considered for additional residential development...'* Furthermore, policy CS3 releases Phase 2 Residential 1 and Phase 3 Residential 2 lands for development on the expiration of current committed sites planning permissions, which have not been extended, unless no other Consolidation of the Urban Core or Phase 1 sites are available for development. The chances of the subjects lands being development under this zoning system are and therefore very low. In the Draft Louth County Development Plan 2021-2027, the subject lands have been zoned as Strategic Land Reserve and are not considered available for development within the new plan period to 2027.



APPENDIX 3 – MASTERPLAN

Prepared by



VIRTUS

Henry J Lyons

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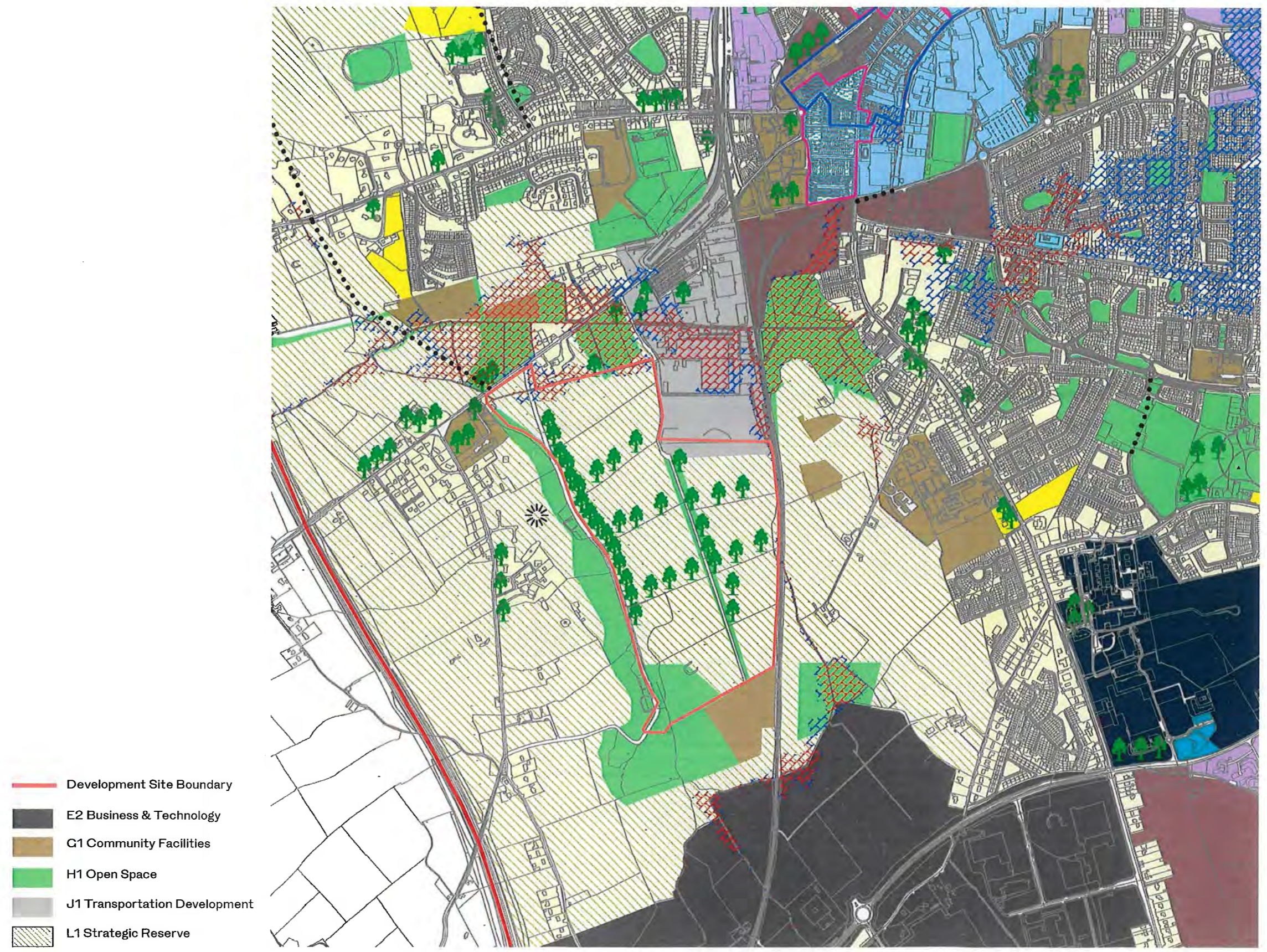
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Existing Site

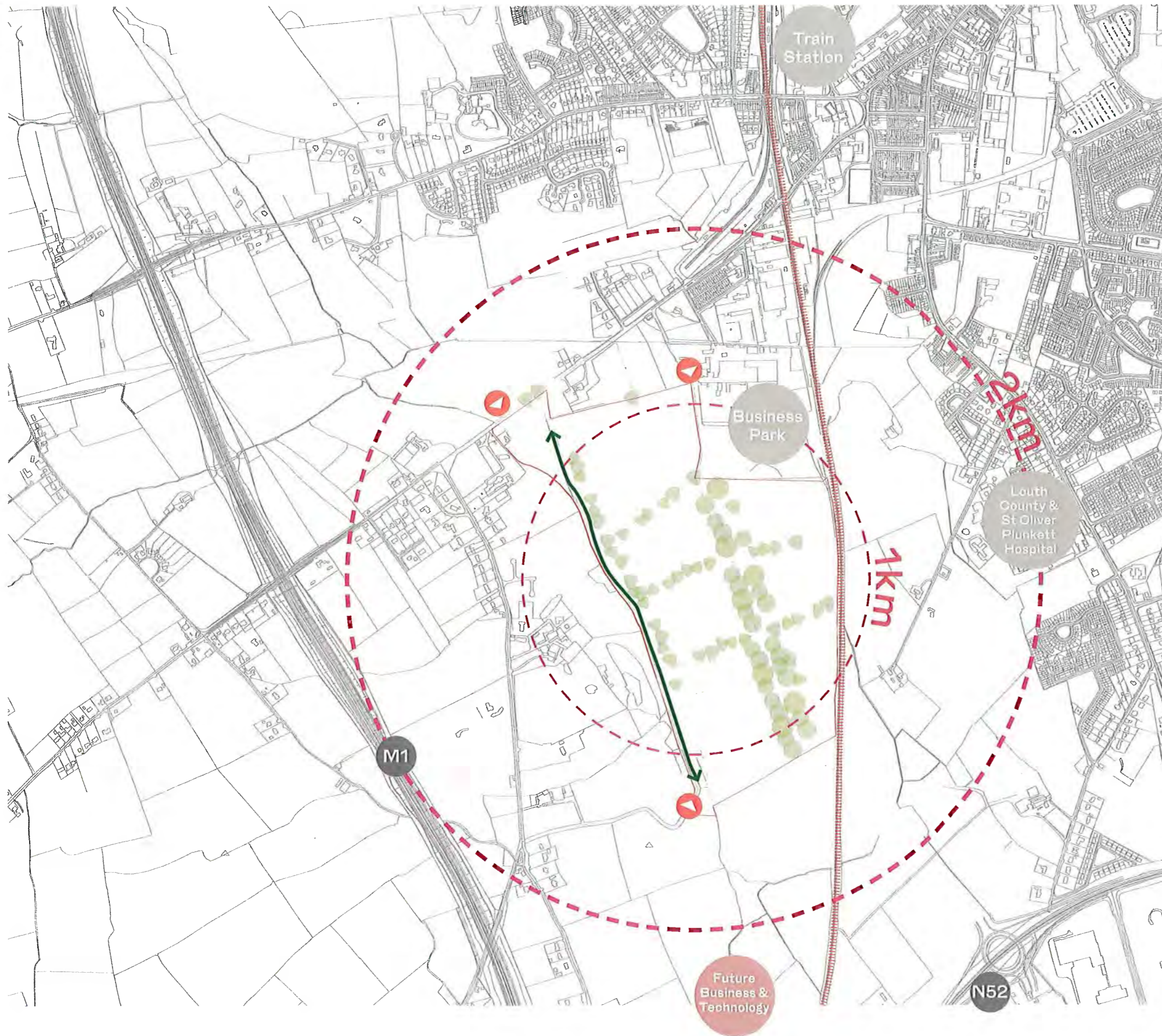


— Development Site Boundary

Existing Site - Development Plan (DRAFT)

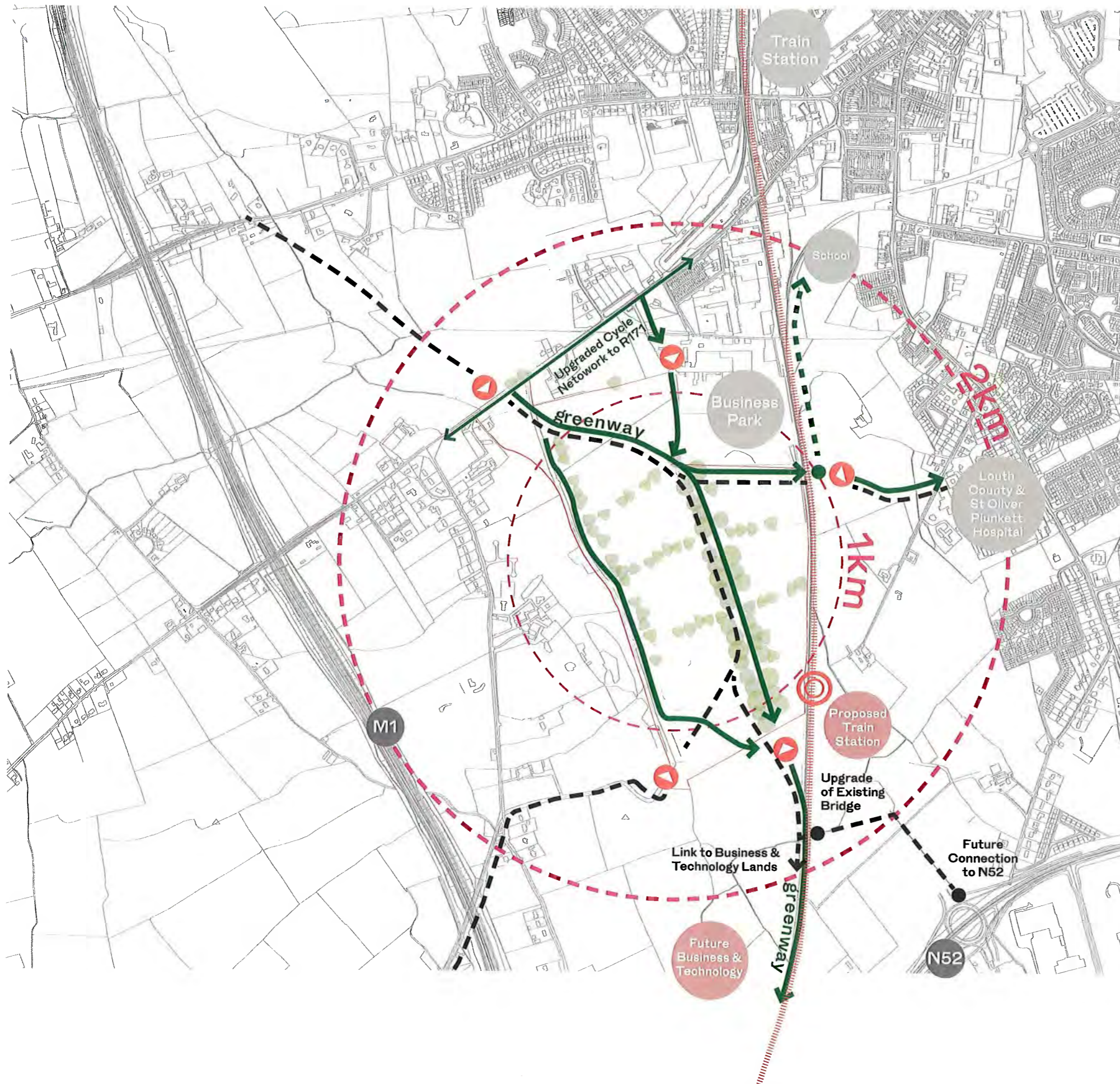







Site Connections



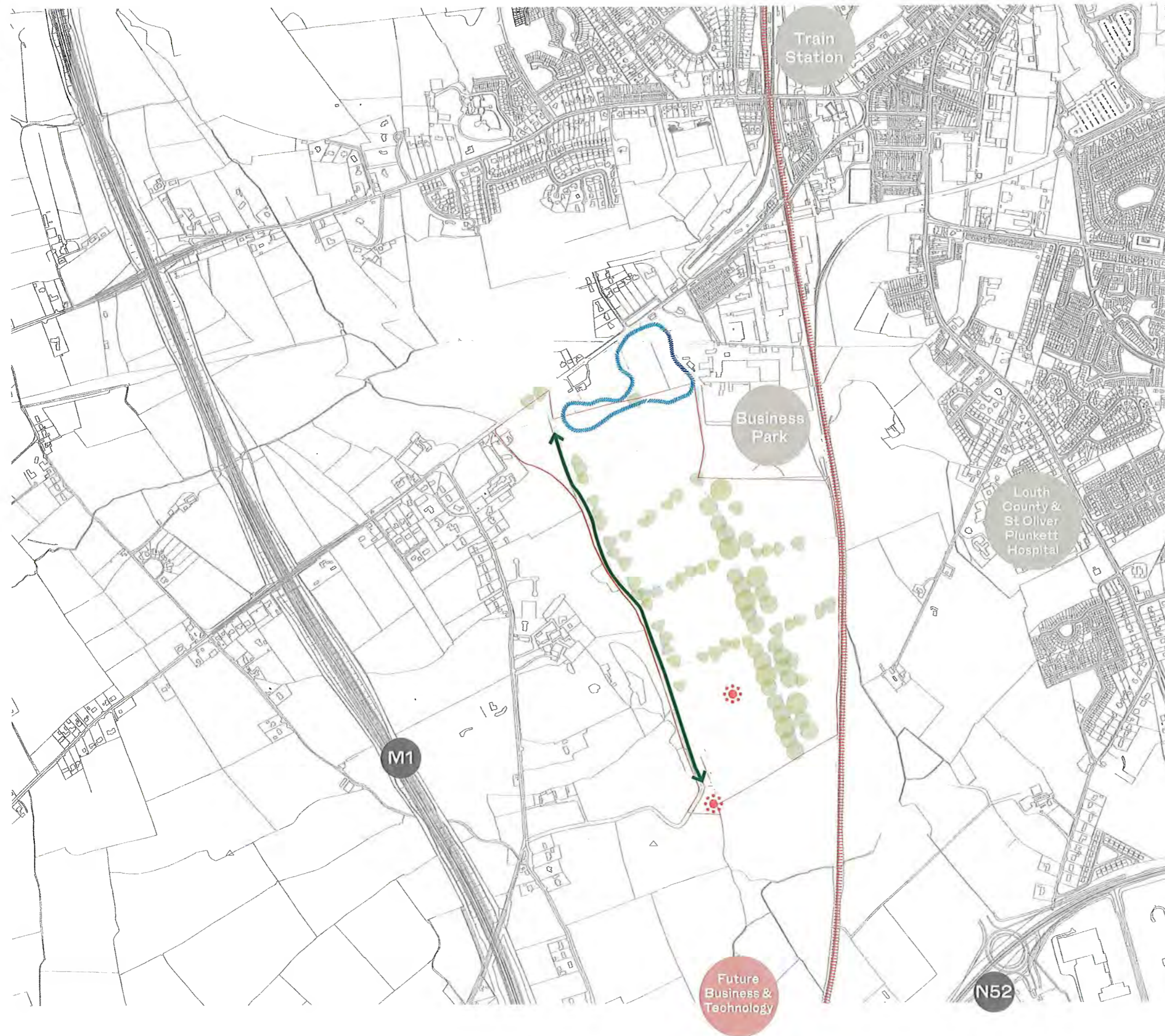
-  Site Entrances
-  Development Site Boundary
-  Proposed Road Infrastructure
-  Pedestrian / Cycle Links
-  Rail Network

Site Connections - Opportunities



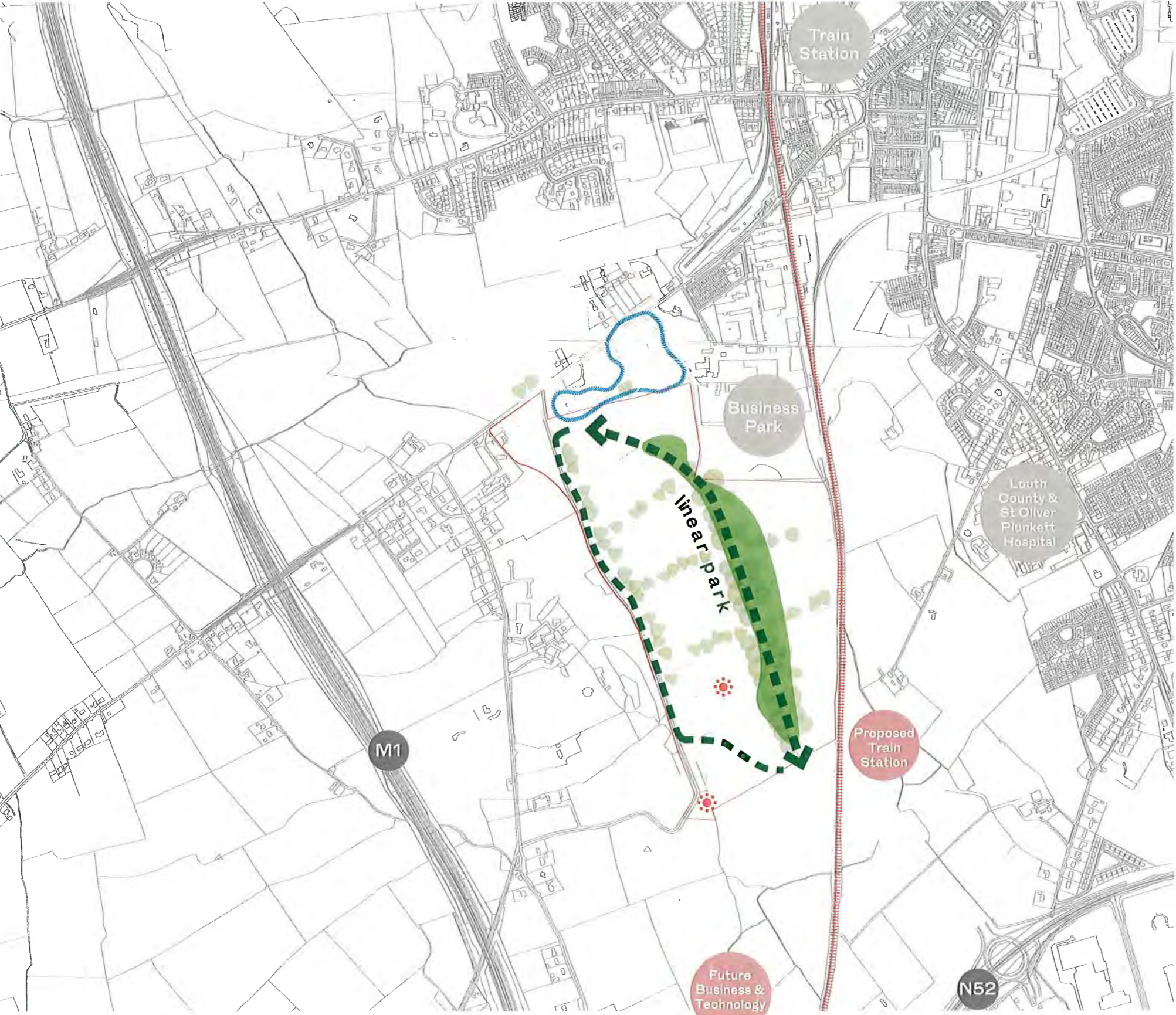
-  Site Entrances
-  Development Site Boundary
-  Proposed Road Infrastructure
-  Proposed Greenway / Cycle Links
-  Rail Network

Site Character - Constraints



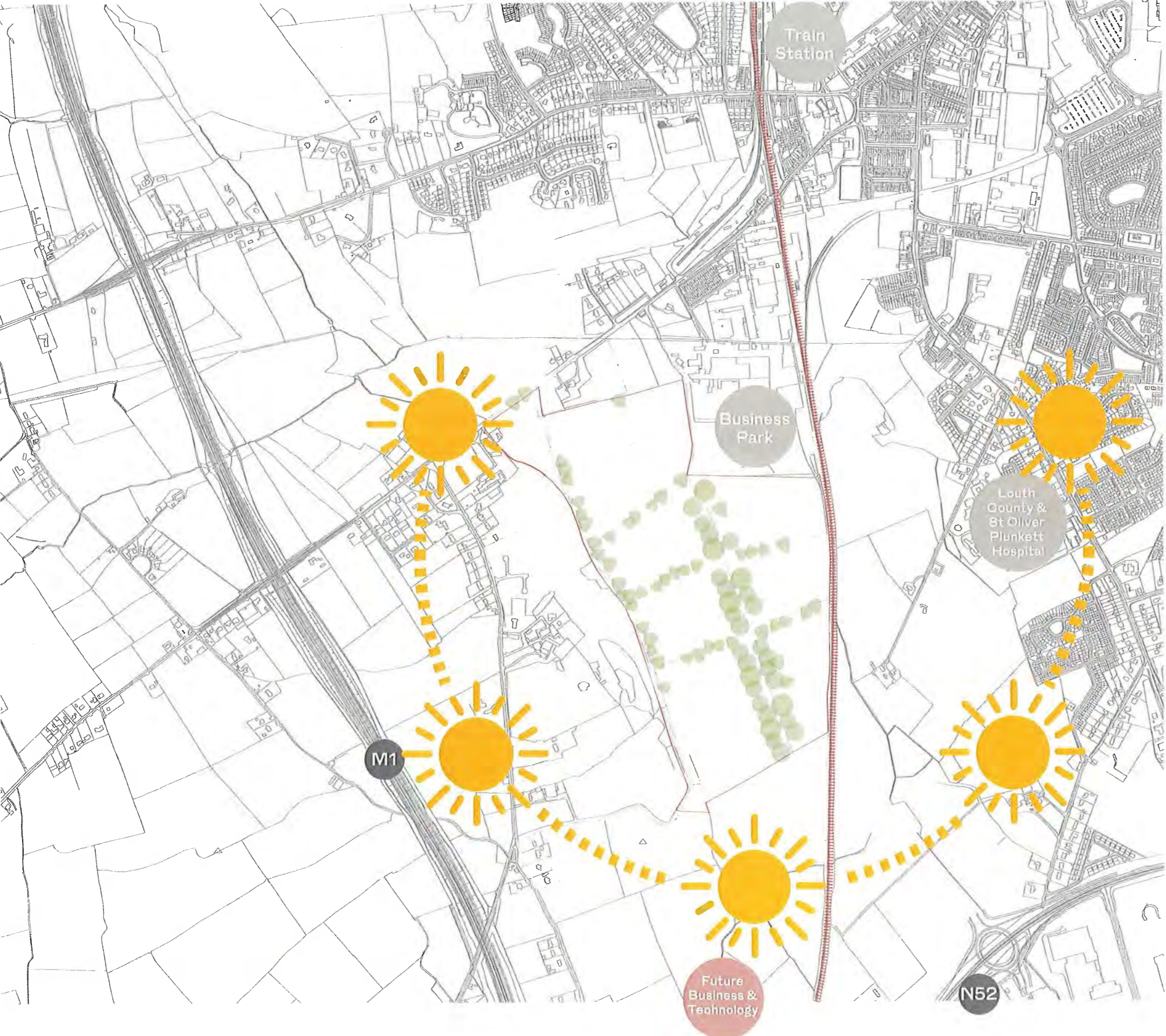
- Development Site Boundary
- National Monument
- Floodzone
- Rail Network
- Existing Trees/Hedgerows

Site Character - Opportunities



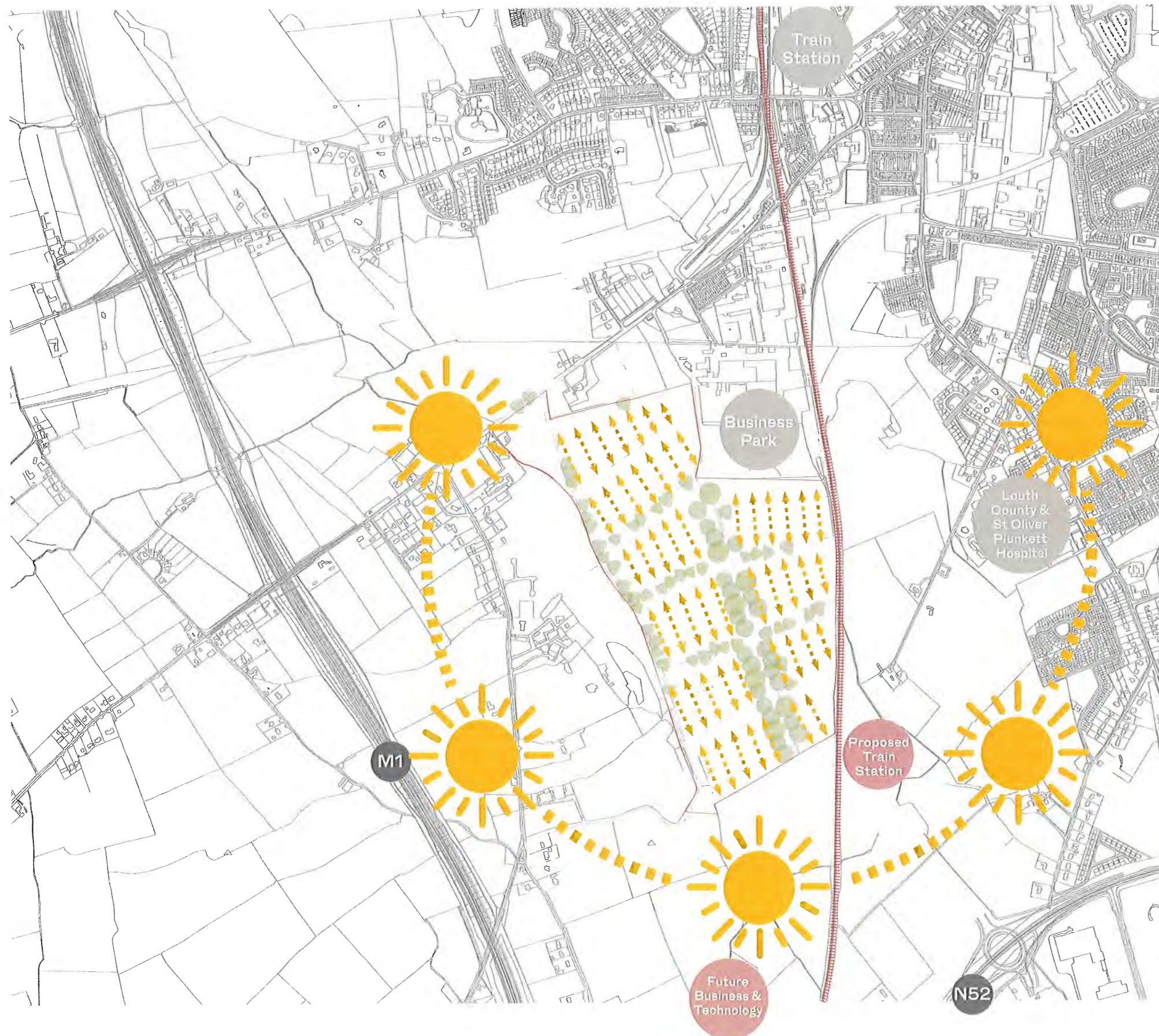
- Development Site Boundary
- National Monument
- Floodzone
- Rail Network
- Public Open Space / Linear Park

Site Orientation - Constraints



- Development Site Boundary
- Sunpath
- Rail Network

Site Orientation - Opportunities



Development Plots - Constraints



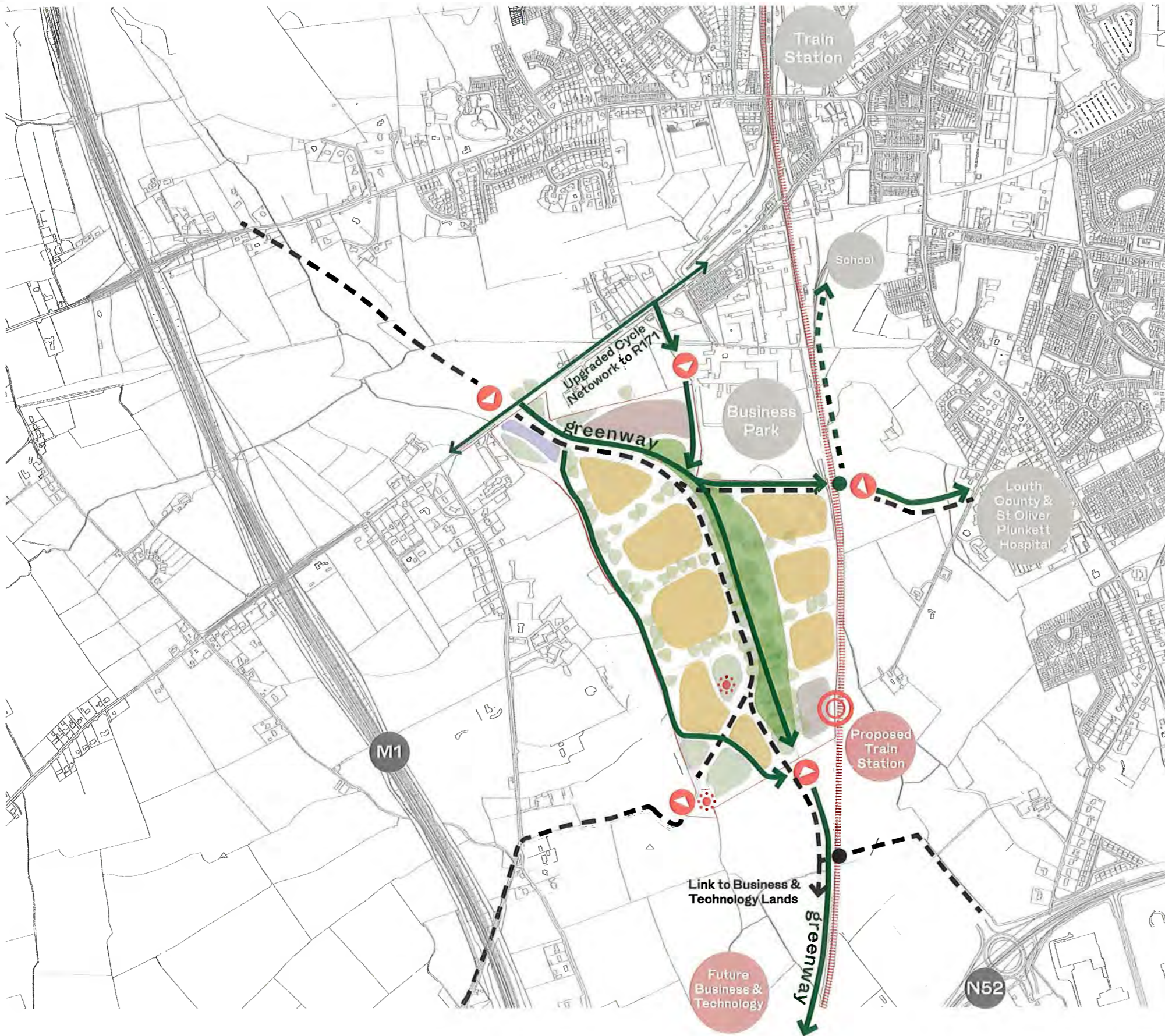
- Development Site Boundary
- Wayleave
- Floodzone
- Rail Network
- Public Open Space











Development Plots - Opportunities



- Development Site Boundary
- Wayleave
- Floodzone
- Rail Network
- National Monument
- Development Plots
- Public Open Space

Site Strategy



-  Site Entrances
-  Development Site Boundary
-  Proposed Road Infrastructure
-  Proposed Greenway / Cycle Network
-  Rail Network
-  Retail / Mixed Use
-  Residential Development
-  Public Open Space / Linear Park
-  Train Station / Park & Ride
-  Community / School



Artist's Impression - Linear Park Looking South Along Proposed Greenway

Site Strategy



65.64
ha

Site Area

1300

Residential Units

25%

Public Open Space

- ① Site Entrance
- ② Linear Park
- ③ School
- ④ Retail/Mixed Use
- ⑤ Greenway
- ⑥ Train Station
- ⑦ Park & Ride
- ⑧ Graveyard
- ⑨ National Monument
- ⑩ Railway Line
- ⑫ Flood Zone
- ⑬ Upgraded Infrastructure
- ⑭ Public Open Space



Artist's Impression - View of Indicative Residential Development

Henry J Lyons

Ardee Road, Dundalk
Concept Masterplan

December 2020



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