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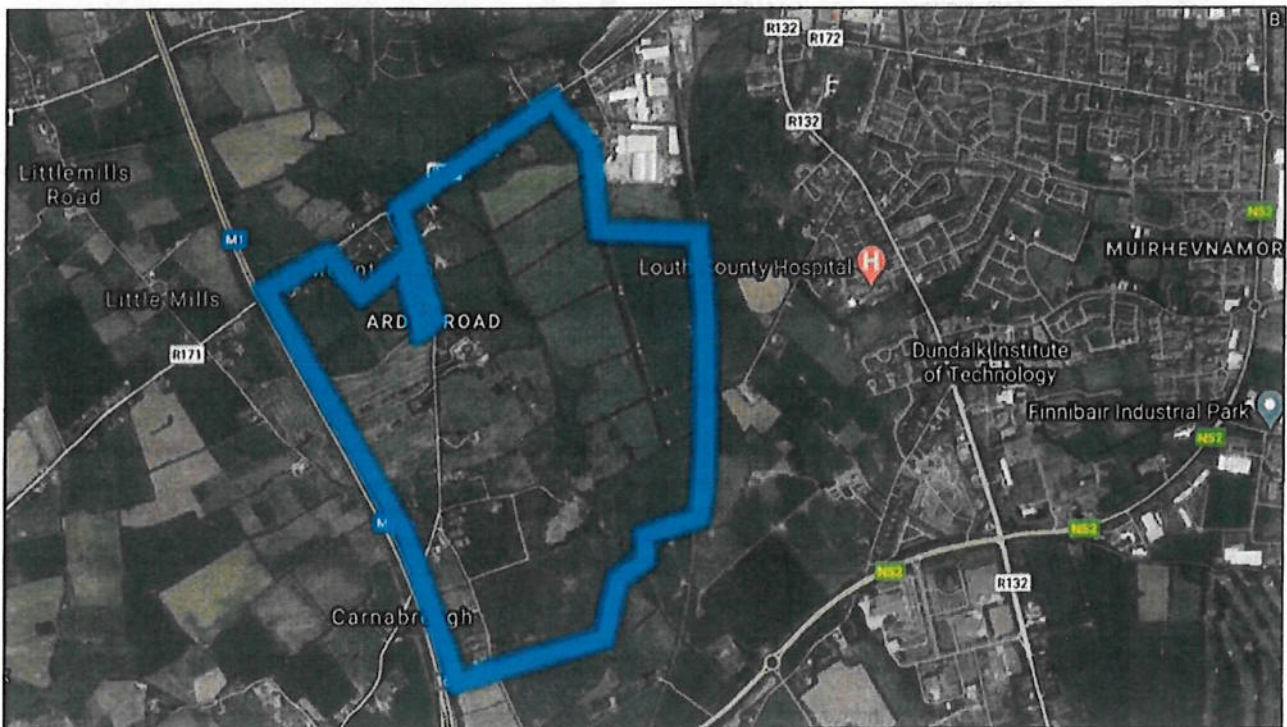
Louth County Council
22 DEC 2020
Customer Services
Dundalk

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SUBMISSION ON DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Introduction

We, P. Herr & Associates, wish to make a submission on the Draft Louth County Development Plan 2021-2027. Our submission relates to the appropriateness of the south-west sector of Dundalk to accommodate additional employment zoning. The lands in question are identified approximately below.



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The central points of this submission are:

- ✓ Dundalk is a Regional Growth Centre as set out in National Planning Framework (NPF). It is strategically located within the Dublin-Belfast Economic Corridor which is noted in the NPF as being the largest economic agglomeration on the island of Ireland.
- ✓ The lands south west of Dundalk, particularly the lands adjacent the Brewery Business Estate, are considered directly contiguous with the urban fabric of Dundalk. They provide a logical extension to the existing employment development at Brewery Business Estate. The development of these lands for high quality employment floorspace will support Louth County Council (LCC) in meeting its economic goals over the Development Plan period, as well as supporting the strategic objectives of the Regional Spatial and Economic Strategy (RSES) and the NPF.
- ✓ These strategically important lands have been earmarked for future development in previous iterations of the County Development Plans. Despite these longstanding ambitions, we note that much of these lands, including those which abut Dundalk's urban edge, are now proposed to be zoned 'Strategic Land Reserve'. This effectively precludes their development until 2028 at the earliest under the Draft Plan.
- ✓ The development of these lands will result in a number of infrastructure improvements. In particular, the lands south west of Dundalk 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.

We strongly consider that lands which abut the Brewery Business Park can assist the Council to meet its short-medium term employment land requirements in a sustainable way, as well as facilitating the future wider (strategic) expansion to the south west of Dundalk (within the confines of the M1) over the plan period and beyond. We, therefore, request that the forthcoming LCDP provides for 'E1 General Employment' zoning on the lands which abut the south west edge of Dundalk Town Centre.

Suitability of Lands for Employment

It is considered that lands are sequentially preferable for zoning. The reasons for this are:

- a. The lands directly south west of Dundalk are sustainably located, adjacent Dundalk's urban area and is therefore sequentially preferable.
- b. The zoning of lands directly south west of Dundalk, adjacent the Brewery Business Estate and north of the Business and Technology lands to the south would result in clustered development as promoted by Policy Objective EE 20.
- c. The lands south west of Dundalk have 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 outdoor network in Dundalk and County Louth.

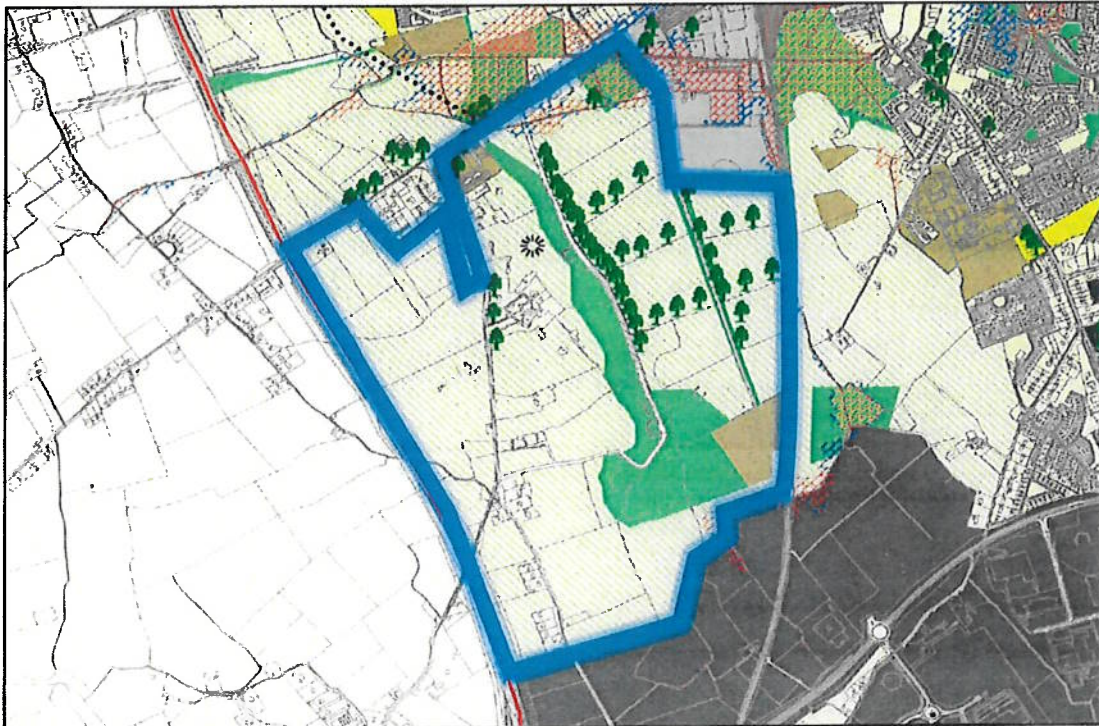
- d. Dundalk is a Regional Growth Centre and is located along the Dublin to Belfast Economic Corridor and therefore economic development should be directed here in the first instance in line with Policy Objective EE 37 of the Draft Plan which promotes Dundalk as a primary centre for employment in the County that will allow the town to function as a driver for economic growth in the border area.
- e. The Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031 has identified Dundalk as Regional Growth Centre and recognises its significant potential to function as a driver for economic development in the Region.

Review of the Draft Louth County Development Plan 2021 - 2027

Lands South West of Dundalk in the Draft Louth County Development Plan 2021-2027

The lands south west of Dundalk are predominantly categorised L1 Strategic Reserve in the Draft Plan. 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.

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 development lands in Dundalk.



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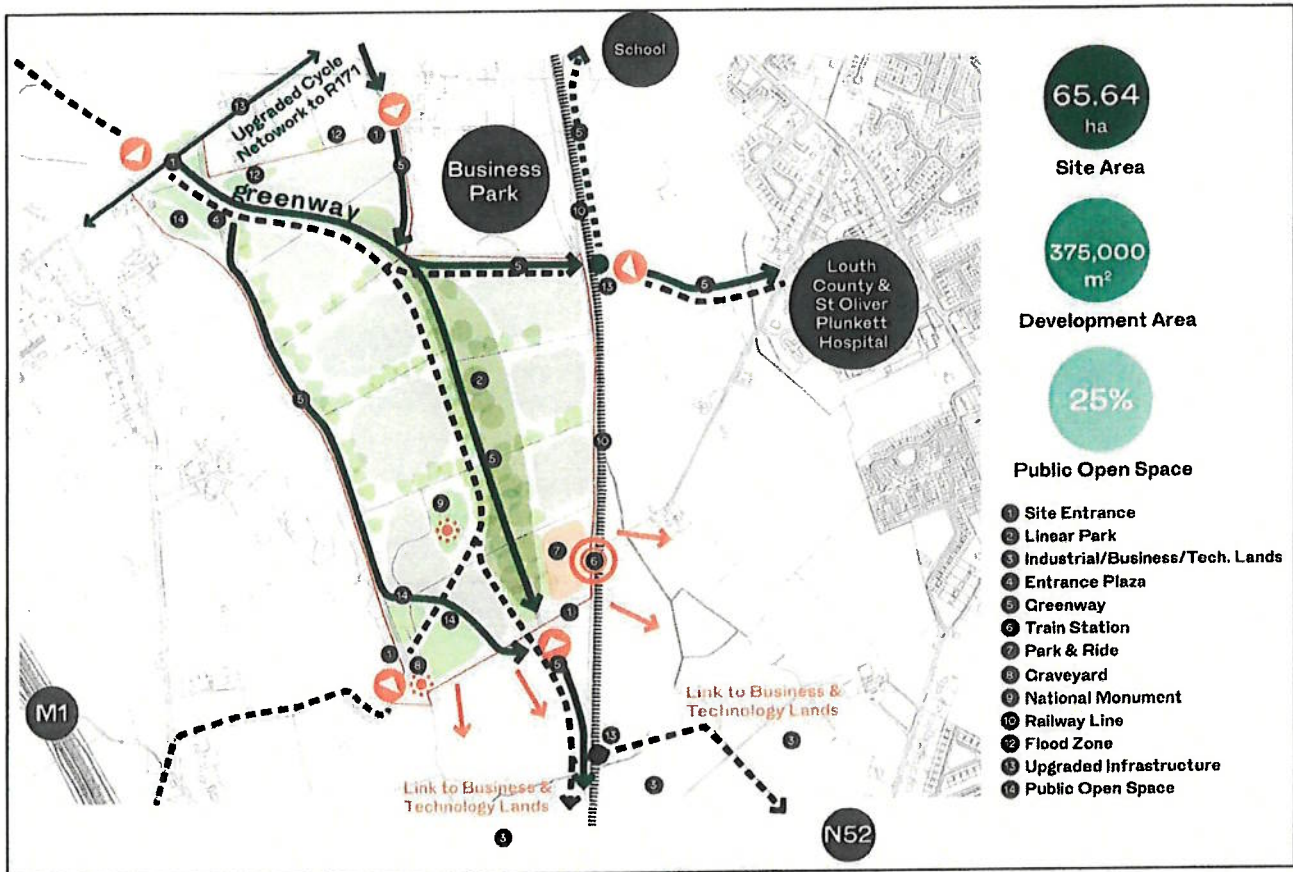
The lands south west of Dundalk correlate to 'Site 11' in the Dundalk Assessment. We have a number of concerns in relation to the methodology and approach used by the Council in relation to the infrastructure assessment and land use evaluation, as follows:

- i. It appears that not all zoned undeveloped lands have been included in the assessment. It is submitted that there are significantly more parcels of zoned land than the 18 no. assessed by the Council. It is requested that a comprehensive review is undertaken by the Council.
- ii. Some of the 'sites' assessed are of a significant size. For example, 'Site 11' to the south-west of Dundalk is a large extent of lands. Due to the wide area which it covers, this should have been split into smaller parcels of land based on the sequential approach. In the case of Site 11, the lands which adjoin Dundalk's built form should be assessed separately from the lands which border the M1 and have no spatial relationship with the town centre at present. As a result of the assessment as it stands, the north eastern lands within Site 11 which are located only c.2km from the Market Square in the town centre have not been considered proximal to the town centre – scoring the maximum of 5 points under the 'proximity to the town centre' category.
- iii. The weighting system used in the land use evaluation 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.

Proposed Additional Employment Zoning to the South-West of Dundalk

It is considered that, in addition to representing an appropriate site in itself for sustainable employment development, the lands directly south west of Dundalk have significant strategic potential. Not only by being located within the Dublin-Belfast economic corridor but also in terms of providing a driver for new 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.

There are a number of significant wider benefits that can be delivered as part of developing these lands, and particularly the eastern portion of these lands, in addition to facilitating additional, much needed employment land. In terms of the eastern portion of these lands, some of the benefits that can be delivered are illustrated in the diagram below and are set out in written form further below.



- i. Trigger for **the new Link Road from R178 Carrickmacross Road to R171 Old Ardee Road**
 - o The new link road is identified at Table 7.4 (Key Road and Bridge Projects) of the Draft Louth County Development Plan as a key project for Dundalk.
 - o 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.
- ii. Furthermore, deliver the first phase of a **strategic link road** through the subject lands
 - o This would comprise 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 to the Business and Technology Lands to the south, opening up those lands for development and investment and future-proofing the economic and employment status of Dundalk.
- iii. Potential to deliver or contribute to the delivery of **the new railway station to the south of Dundalk**.
 - o The site adjoins the existing railway line.
 - o Policy Objective MOV 14 of the Draft Plan seeks *"To secure, in co-operation with Iarnród Éireann,*

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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.
- iv. 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%).
- 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, where possible. 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”.*
- v. **Upgrades to the R171** comprising of provision of improved footpath and cycleway facilities, improving linkages with Dundalk town centre.

Summary and Conclusion

Having regard to the above, it is respectfully submitted that the lands south west of Dundalk, particularly those closest to the town, are suitable for zoning, in accordance with the test set out in section 4 of the Development Plan Guidelines.

Specifically, we highlight the following:

- 1) The lands are positioned at an ideal location to ensure a high quality business park is provided; i.e. sustainably located proximal to public transport, road networks, the town centre, services and existing and proposed employment developments.
- 2) The lands are contiguous to the existing business park located adjacent and the Business and Technology lands to the south.
- 3) The lands are currently within the settlement envelope for Dundalk and would contribute to compact development.
- 4) The lands are directly accessible from the existing road infrastructure.
- 5) The lands are serviceable.

- 6) The lands are available for development in the short to medium term.
- 7) New employment land should be directed to Dundalk in the first instance being a Regional Growth centre and being located along the Dublin to Belfast Corridor.
- 8) The lands south west of Dundalk have 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.
- 9) There are two national monuments on the subject lands. 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.
- 10) The lands directly south west of the Dundalk contain 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.

✓ Padraig Herr