

Draft Louth County Development Plan 2021-2027,

Forward Planning Unit,
Development Plan Review,
Louth County Council,
Town Hall, Crowe Street,
Dundalk,
Co. Louth
A91 W20C.

21st of December 2020

Dear Sir/Madam,

SUBMISSION RE: DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 – LANDS AT CARRICK ROAD, DUNDALK, CO.LOUTH

Tapemount Limited of _____ has retained Stephen Ward Town Planning and Development Consultants Limited to make this submission on the Draft Louth County Development Plan 2021-2027 having regard to their lands at Carrick Road, Dundalk County Louth.

Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, Co.Louth.

To assist Louth County Council in complying with the provisions of the Data Protection Act full details of our submission on behalf of Tapemount Limited are attached.

Stephen Ward



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1.0 SITE LOCATION AND CURRENT ZONING OBJECTIVES



Figure 1 - Location of Submission Lands – approximate site boundaries outlined in red

The submission lands are located to the north of the Carrickmacross Road, Dundalk approximately 1.2km west of the Dundalk Station and within 2km of Clanbrassil Street and Dundalk’s town centre. The lands are bound by the Carrickmacross Road (R178) to the south, existing housing on the east and west and Greenfield lands to the north. The Mounthamilton housing development is located to the south east on the opposite side of the R178). The lands outlined in red extend to approximately 7.55hectares and are currently zoned ‘Residential 1’ and ‘Residential 2’ in the Dundalk and Environs Development Plan 2009-2015 with part of the North West portion zoned Community, Education and Recreation. The majority affected by a road objective and associated buffer area. The submission lands fall within the Mount Avenue Masterplan Area. According to the Mount Avenue Masterplan, the link road indicated on the zoning map is to be the ‘Primary Link Road and circulation route’ within the Masterplan lands.

2.0 ZONING APPLIED BY THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2017

The submission lands are zoned ‘A1 Existing Residential’ and ‘L1 Strategic Reserve’ in the Draft Louth County Development Plan 2021-2027 as illustrated by Map 1.2 with the North West portion zoned ‘G1 Community Facilities’ (see figure 2). The L1 lands divide the landholding leaving A1 lands either side and unconnected. There is a dashed black line that indicates the route of a ‘Future Link Road’.

This submission seeks the zoning of the submission lands as ‘A2 New Residential’ in recognition of their proximity to the Dundalk Train Station, the Town Centre and as part of the wider Mount Avenue Masterplan growth area. It is submitted that lands identified as ‘Strategic Reserve’ isolates the lands identified for Community Facilities and will not facilitate the construction of the identified future link road. Analysis of the submission lands prepared as part of the Draft County Plan, though broad and generalised, indicates that infrastructure is available to release these land during the lifetime of the Louth County Development Plan. A preliminary analysis by Waterman Moylan Consulting Engineers contained at Appendix A also confirms the availability of existing services to the submission lands. We note the composite map shows the submission lands to be outside flood zone A and B.

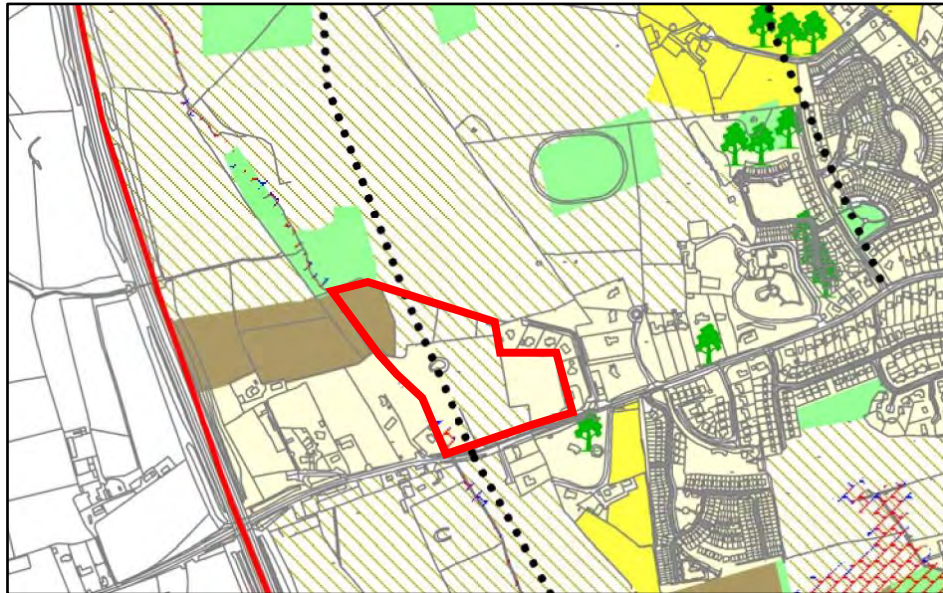


Figure 2 - Extract from the Dundalk Draft Zoning and Flood Zones Map 1.2 as contained in the Draft Louth County Development Plan



Zoning of the Mount Avenue Masterplan Lands

According to paragraph 2.14.5 of the Draft Plan “One of the primary locations for residential growth during this Plan will be in the Mount Avenue area to the west of the town centre”. The Draft Plan states, “whilst part of these lands will be released by the construction of the LIHAF funded Mount Avenue Link Road, there is c.38 hectares of land that are subject to a Master Plan with the capacity to deliver c.1,200 residential units in addition to a linear park and community facilities”. The Draft Plan does not indicate on a map the location of the new Mount Avenue Masterplan lands but it is described in Table 13.1 as “an area of c.38 hectares of land to the north-west of Dundalk Town Centre with frontage onto Mount Avenue, Greyacres Road, and Castletown Road”. The area as described includes c. 12ha of land zoned H1 Open Space according to the zoning map contained in the Draft Plan. Taking account of roads infrastructure required to serve this area as outlined by paragraph 2.14.7 and Chapter 7 of the Draft Plan (table 7.4) and associated land take, it is submitted that these lands will not provide the estimated 1,200 residential units and that additional residential zoned lands are required in the Mount Avenue Area.

According to the Draft Plan, the Council was successful in its LIHAF funding application for the Mount Avenue Road upgrade in Dundalk, which will support an initial development of 200 homes with a potential for up to 1,200 units on the wider lands (para. 3.2.1). The Local Infrastructure Housing Activation Fund (LIHAF) is a key element of Pillar 3 of Rebuilding Ireland – Build More Homes. The objective of the fund is to relieve critical infrastructure blockages to enable the accelerated delivery on key development sites in urban areas. According to the LIHAF project descriptions (March 2017), *“the proposal is for a new access road which will open up zoned residential lands for development circa 43 Ha in close proximity to Dundalk Town Centre and Dundalk railway station”*. It is submitted should insufficient lands be identified in the Mount Avenue Area, it would not make best use of the LIHAF road and would be contrary to Pillar 3 of Rebuilding Ireland.

3.0 EVALUATION OF THE SUBMISSION LANDS IN THE DRAFT PLAN

Part of the submission lands fall under the assessment of ‘Site 10’ in the Infrastructure Assessment and Land Use Evaluation contained at Appendix 2 of the Draft Plan. There is no account taken of the land ownership in the assessment so the lands identified as ‘Residential 1’ by the Dundalk and Environs Development Plan 2009-2015 and form part of our client’s landholding have not formed part of the assessment.

The traffic light system used in the Infrastructure Assessment and Land Use Evaluation identifies ‘Site 10’, which is an extensive area of land approximately 100 hectares, as Tier 2 by way of an amber colour that indicates that services are not available or further investment in infrastructure is required and this investment is likely to be provided during the lifetime of the Plan (p.3, emphasis added). As such, there is no impediment identified that prevents these lands coming forward within the lifetime of the Plan.

The lands to the north of the Mount Avenue Masterplan area ‘Site 9’ sit within the same tier as lands to the south of the masterplan area ‘Site 10’. However, the scoring system places ‘Site 10’ in a less favourable position. This is a broad brush approach. The lands referred to as a ‘Site’ are not a ‘site’ but a huge expanse of land stretching over 1km northwards from Carrickmacross Road, west to the M1 motorway and east to Mount Avenue. The area is in multiple ownerships and many varying characteristics including topography. It is submitted that the poor score for Site 10 only results in a poor score due to the pre-determined assessment. For example it receives severe marking in terms of ‘infill/backland’ development. The submission lands may not be infill/backland but in a town seeking to become established as a Regional Growth Centre, this is not a reason to apply a poor score to this particular criterion. It is submitted the submission lands would receive a low (good) core by way of a more site specified assessment. Figure 3 illustrates proximity to shops, schools and amenities as well as the Dundalk Train Station. The submission lands have full footpath connectivity to the train station and town centre.

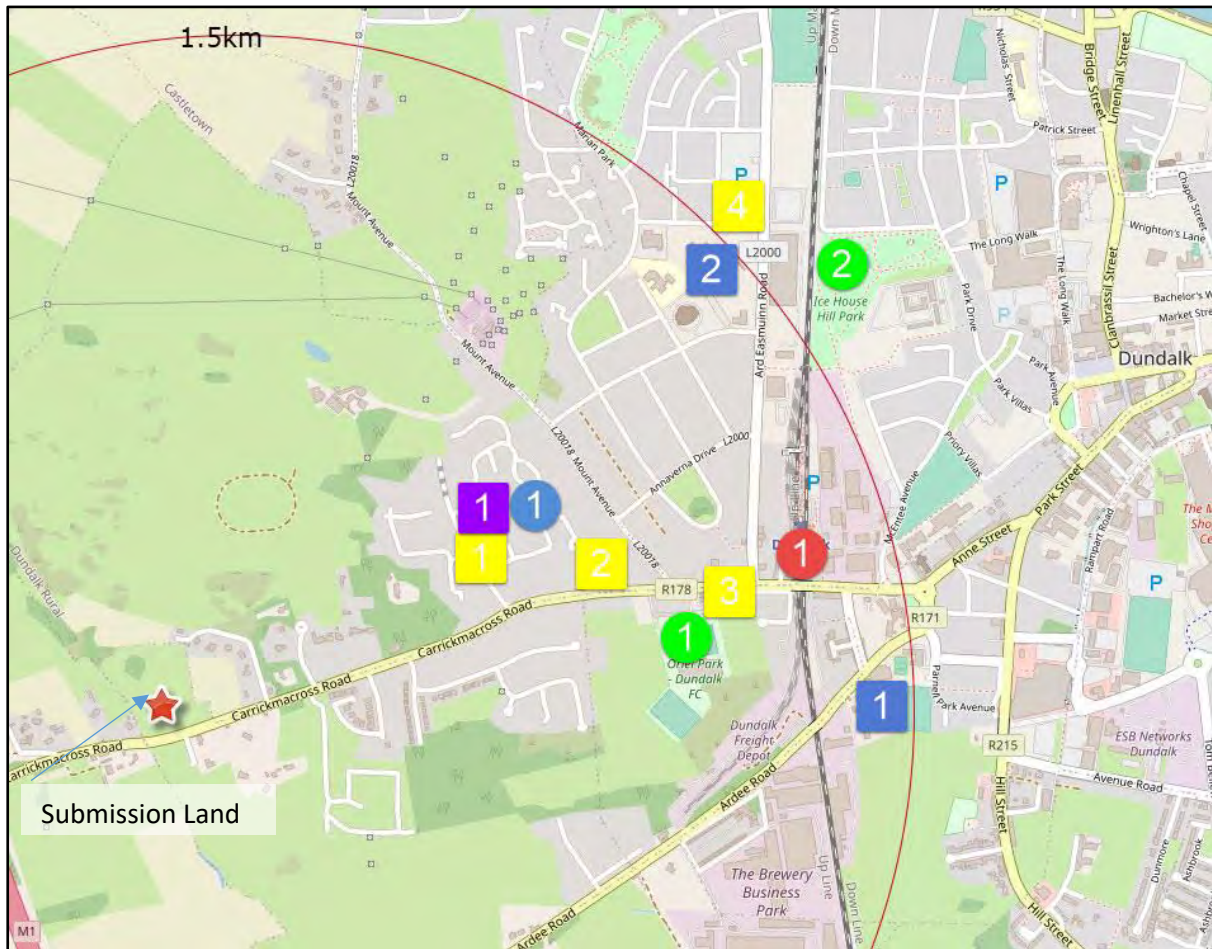


Figure 3 - Facilities and Services within 1.5km of the submission lands

	Dundalk Train Station		Pharmacy		Local Shops		Schools/Creche		Amenity Areas
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4.0 STRATEGIC RESERVE LANDS ARE CONTRARY TO REGIONAL PLANNING POLICY

According to paragraph 2.14.5 of the Draft Plan “With the quantum of residentially zoned lands available in excess of that required for the anticipated population growth during the life of this Plan, an analysis of the undeveloped residentially zoned lands was carried out”.

“Based on this analysis, which took account of the location of the land relative to the town centre, public transport, and local facilities, and the availability of services and infrastructure required to service the lands, the lands were prioritised and ranked accordingly”.

There has been no ranking or prioritising of residentially zoned lands in Dundalk. There are lands that are zoned ‘A1 New Residential’ and lands that are zoned ‘L1 Strategic Reserve’ which effectively ‘dezone’ any lands affected as they “shall not be available for development until after the expiration of the Plan” (Chapter 2, p.42). According to paragraph 13.19.26 of the Draft Plan the objective of zoning lands ‘Strategic Reserve’ is “to provide a land reserve for the orderly expansion of the settlement into the future”. Guidance on this objective states “These are strategically located lands that will generally not be available for development until after the expiration of this Draft Plan”.

It is submitted that the zoning of lands for the next Plan period leaves insufficient lands and restricts the growth of Dundalk for the next 6 years.

The de-zoning of substantial tracts of land within the settlement boundary for Dundalk, a recognised growth centre, is surprising particularly when Dundalk is to be subject to an Urban Area Plan. According to the Regional Spatial and Economic Strategy, “The preparation and adoption of a statutory Urban Area Plan (UAP) by Louth County Council is to be a priority. The UAP is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population” (p.69). ***As currently proposed, the County Plan leaves no room for manoeuvre when it comes to the preparation of an Urban Area Plan for Dundalk and has predetermined the distribution of population within the settlement.***

The restrictive approach applied to zoning residential lands for Dundalk is contrary to the Draft Plan’s statement at paragraph 14.2.1 that “An important driver of the Plan Strategy is to bring policies to a more detailed local level through Urban Area Plans and Local Area Plans. The strategic and broad-ranging policy objectives of the Draft Plan provide a general framework, but not necessarily the detailed treatment required for significant proposals in certain areas”.

It is submitted that in the absence of national guidance on preparing development plans and on the preparation of housing strategies that a very high level of flexibility needs to be contained in terms of housing provision for urban settlements and especially a Regional Growth Centre such as Dundalk.

Mount Avenue Growth Area

In tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework the RSES states that the UAP for the Regional Centre of Dundalk should endeavour to support and facilitate urban expansion through development of the Mount Avenue masterplan lands, and other lands (RSES, p.69).

According to Table 13.1 of the Draft Louth County Development Plan a Master Plan for the Mount Avenue area is ‘under preparation 2020’. However, it is submitted that the RSES, adopted in 2019, took account of the Mount Avenue Masterplan as adopted in 2007 and therefore the residential lands as identified by figure 4 should be reinstated to allow for the growth of Dundalk as envisaged by the RSES and support the identified community facilities, road infrastructure and large areas of public open space identified both in the Draft Louth County development Plan and current Mount Avenue Master Plan.

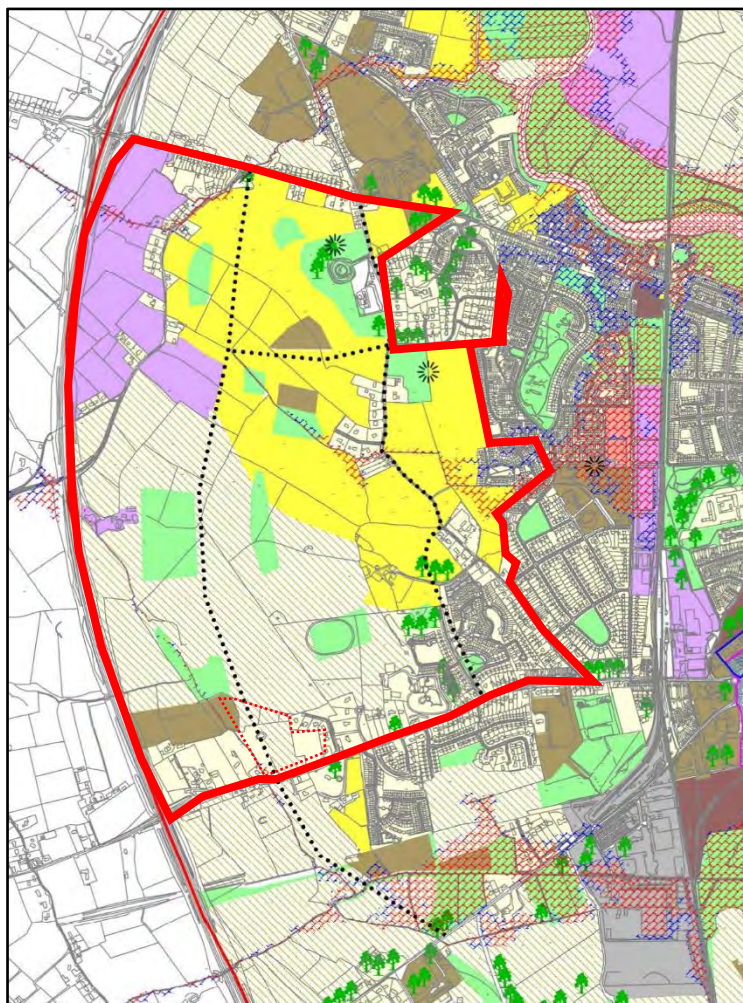


Figure 4 - Extract from the Dundalk Draft Zoning and Flood Zones Map 1.2 with the approximate Mount Avenue Masterplan Area outlined in red

5.0 SETTLEMENT HIERARCHY

The draft Plan sets out the settlement hierarchy as part of the Core Strategy and reflects the settlement categories set out in the RSES. Table 2.4 of the draft Plan identifies Drogheda and Dundalk as the Regional Growth Centres of the County. The Growth Strategy states that the focus of growth for the County will be primarily in Drogheda and Dundalk with a target population of 50,000 by 2031 (para. 2.4.4). In order to strengthen these growth centres, 69% of the projected population and household growth for County Louth is directed to Drogheda and Dundalk (para. 2.5.4). According to Table 2.9 Dundalk is to be allocated the larger share of projected growth during the Plan period (36.3%). However, the treatment of Dundalk in terms of the availability of residentially zoned lands differs entirely from Drogheda.

The new L1-Strategic Reserve zoning does not apply to any lands in the Drogheda area and all lands zoned residential in the Drogheda Borough Council Development Plan 2011-2017 and Northern Environs Local Area Plan area are retained in the draft Plan.

The achievement of growth in Dundalk as envisaged at National and Regional level, requires a suitable 'pipeline' of development opportunities, prioritised on the basis of likelihood of meeting targets and kept under review through monitoring and reporting. In accordance with the RSES, *"in planning for future growth, it will be important for planning authorities to set out and monitor the service capacity and likely rate of completion of development on zoned lands, both brownfield and greenfield as well as elsewhere, having regard to local conditions and trends"*.

According to the Draft Plan *"On-going monitoring shall take account of residential development permitted in settlements designated under the settlement hierarchy in order to ensure compliance with the population allocations defined by the Core Strategy, and to adjust the approach to permitting development proposals in instances where Core Strategy objectives are not being met (para. 14.4).*

The application of the L1-Strategic Reserve zoning objective is not in keeping with the approach outlined above. It is submitted that the L1 zoning objective is far too blunt an instrument to assess development rates and should be removed and residential zoning reinstated. The rate of growth can then be assessed by way of a plan-monitor-manage system which allows for adjustments as envisaged by the draft Plan.

6.0 DE-ZONING OF RESIDENTIAL LANDS IN DUNDALK

According to the RSES, *"Core strategies may apply prioritisation measures and/or de-zoning of land where a surplus of land is identified in plans with regard to the NPF Implementation Roadmap up to 2031. In preparing core strategies account should also be given to the consideration of sequential lands which are suitable for the delivery of housing but may not be forthcoming in the plan period having regard to 2031 roadmap targets, subject to proper planning and sustainable development"* (p.50, emphasis added). The RSES emphasises that development land prioritisation measures are more appropriate than 'de-zoning' of land where there may be a surplus (p.50)

According to the Draft Plan, *"with regard to any surplus of residential lands, both the prioritisation and de-zoning of lands will be considered and will be dependent on the settlement category"* (para. 2.4.3). ***It is again submitted that the de-zoning of land by way of the application of the L1-Strategic Reserve zoning objective is inappropriate for Dundalk as a Regional Growth Centre. There has been no 'tiered approach' or prioritisation applied to lands available for residential development in Dundalk and no option provided should lands identified not come forward for development.***

According to the RSES, *"sites with long-term development potential at priority locations should not be 'reserved' at the land allocation stages of the plan-making and implementation processes, in such a way as would create an unreasonable dependency on such sites being brought forward or that would impede the bringing forward of other suitable lands with better prospects for delivery in the short term, if the strategic sites are not being brought forward by their owners"*.

The RSES highlights the need to facilitate housing delivery and states *"Effective ways to tackle any tendencies towards land and/or planning permission hoarding or excessively slow delivery include measures such as the Vacant Site Levy and the release of alternate lands where permitted development, without any wider delivery constraints, is not being brought forward"* (emphasis added).

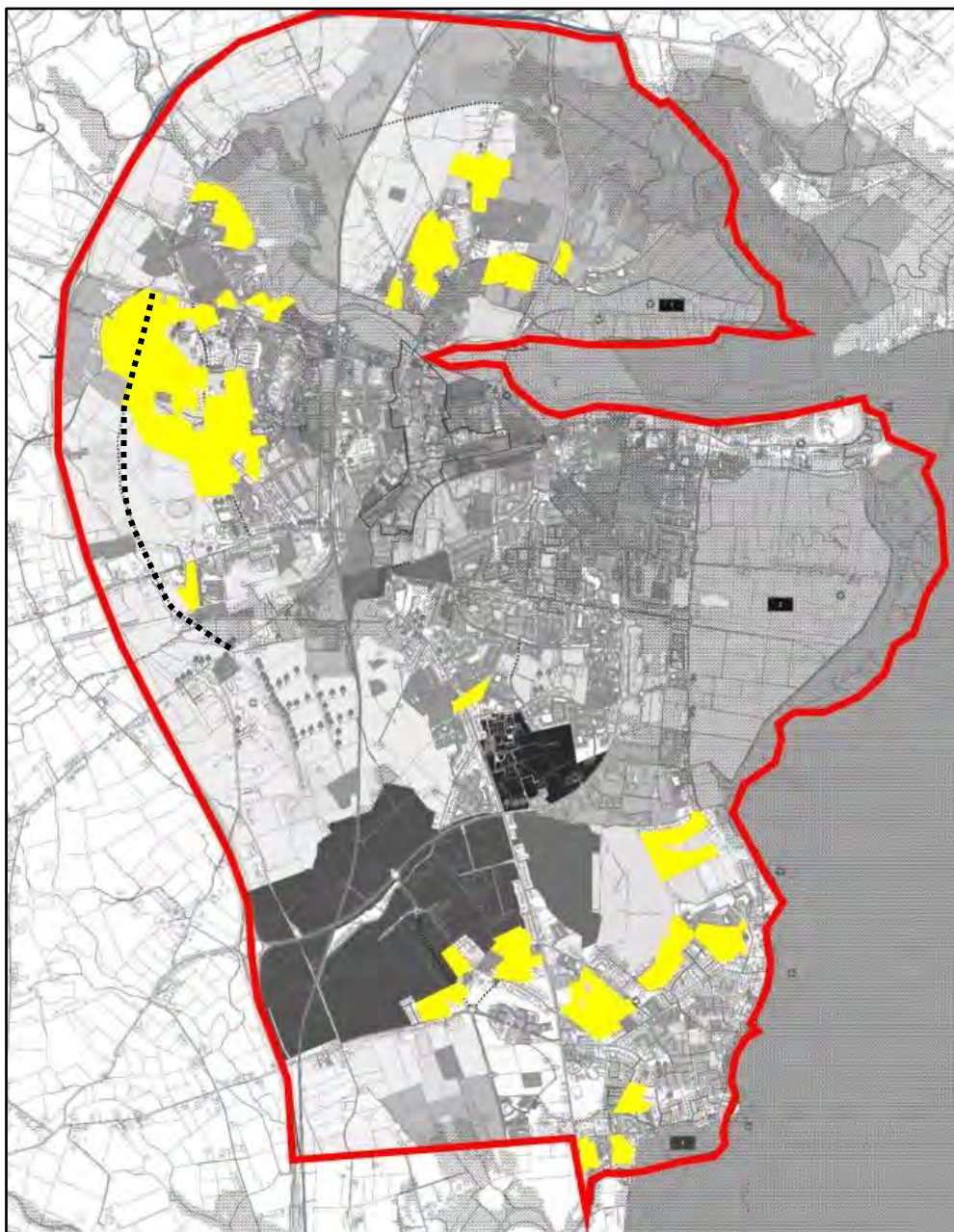


Figure 5 - Extract from Map 1.2 highlighting location of A2 Zoned lands in Dundalk and Blackrock

Figure 5 clearly shows the one large land bank to the west of Dundalk. As already noted in this submission, there is no assessment as to the availability of these lands to come forward during the lifetime of the Plan. Should they not come forward, there are limited options within Dundalk town for strategic housing development. The submission lands can be easily accessed from the Carrickmacross Road as confirmed by the technical note contained at Appendix A and can be serviced within the lifetime of the Plan.

It is also noted that the draft Plan includes roads objectives with 'Future Link Roads' indicated on Map 1.2 for Dundalk that pass through extensive areas of Strategic Reserve. It is a Policy Objective of the Draft Plan (MOV44) "To support the progression of the identified Link Roads required in Dundalk and to continue to engage with stakeholders and local landowners in securing the funding to design and deliver these links".

It is difficult to understand how these roads can be constructed without the development to support them.

7.0 THE TIERED APPROACH

According to National Policy Objective 72a-

“Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan”.

As acknowledged by the Draft Plan, the NPF has adopted a ‘Tiered Approach to Zoning’ identifying lands available for development and those dependent on the provision of additional services and infrastructure” (Chapter 2, p.17). Further detail is provided on the Tiered Approach in the Infrastructure Assessment and Land Use Evaluation (IA) contained at Appendix 2. According to the IA, the Plan will implement the policy of the National Planning Framework (NPF) through *“a tiered approach to land use zoning that will differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the Plan”* (p.1).

Appendix 3 of the NPF provides a methodology for a tiered approach to land zoning. The NPF states, *“Current development or area plans may include zoned lands that cannot be serviced during the life of a development or area plan by reference to the infrastructural assessment of the planning authority. This means that they cannot be categorised as either Tier 1 lands or Tier 2 lands per the above and therefore are not developable within the plan period. Such lands should not be zoned for development or included within a development plan core strategy for calculation purposes”.*

It is submitted that the NPF does not require the de-zoning of lands that qualify as Tier 1 or Tier 2. It is only where land has been identified by the infrastructural assessment of the planning authority that cannot be serviced during the life of a development plan or area plan that it should not be zoned for development as specified by NPO 72c.

The Infrastructure Assessment and Land Evaluation contained at Appendix 2 of the Draft Plan adopts a traffic light assessment system to identify the suitability of sites for new development as Tier 1 or Tier 2 lands and an indication of their suitability for development by allocating a score to each site. In terms of the Infrastructural Assessment, *“a green colour indicates that services/infrastructure are available; an amber colour indicates that services are not available or further investment in infrastructure is required and this investment is likely to be provided during the lifetime of the Plan; and a red colour indicates services are unavailable and unlikely to be provided during the lifetime of the Plan”* (p.3, Appendix 2). This would appear to accord with the NPF standardised tiered approach categorising land as Tier 1 or Tier 2.

According to the Table on page 2 of the Infrastructure Assessment and Land Evaluation contained at Appendix 2 of the Draft Plan, there are only two sites (Nos. 3 and 7) evaluated in Dundalk that are identified by a red colour which indicates that services are unavailable and unlikely to be provided during the lifetime of the Plan. Site number 3 has been zoned for ‘E1- General Employment’ and site number 7 has been zoned ‘L1 Strategic Reserve’. All other lands evaluated qualify as ‘Tier 1 or Tier 2’ lands (as indicated by an amber traffic light).

In keeping with National Policy, lands identified as Tier 2 can be zoned for development within the lifetime of the Development Plan. In contrast, one of the two sites identified as not qualified to be Tier 1 or Tier 2 has been zoned in the draft Plan.

The Land Use Evaluation also contained at Appendix 2 applies a scoring system relating to the suitability of lands for development in terms of criteria such as proximity to town centre and availability of public transport. A lower score is represented by a green colour, a mid-range score by amber, and a high score with red. The sites with the lower score are considered to be more optimal locations for development.

This system does not appear to correspond to the zoning objectives applied to lands in Dundalk, with sites having a higher and less favourable score zoned for Residential Development, for example 'Site 4', while sites with a lower and more favourable score allocated as Strategic Reserve (sites 5,6,10, 11,12).

The Regional Spatial and Economic Strategy clearly states, "The NPF or the NPF Implementation Roadmap document, do not seek the downzoning of land" (p.50, RSES). The approach of the NPF seeks to avoid uncoordinated development that undermines the national policy objectives. When prioritising lands, the NPF recognises "There are many other planning considerations relevant to land zoning beyond the provision of basic enabling infrastructure including overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services etc" (p.137). It is only through weighing up all relevant factors, together with the availability of infrastructure, that an order or priority can be applied to deliver planned growth and development.

The evaluation of development lands in Dundalk is missing a key piece of information. There is no assessment as to what lands are available. It is acknowledged that the Planning Authority are currently operating in a policy vacuum in this regard. In the UK, for example, in order to be included within the core strategy for calculation purposes, sites must be considered **suitable, available and achievable**. The potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when should form part of the site evaluation. In this way, a realistic trajectory of anticipated development can be provided based on the evidence available. In the same way, where sites have been discounted, evidence justifying reasons why should be given. This would then provide the Planning Authority with the basis of a system that can be monitored as envisaged by policies HOU 6 and 7 of the Draft Plan. These policies can be brought to a more detailed level through the Urban Area Plan.

8.0 HOUSING NEED DEMAND ASSESSMENT

As recognised by the RSES, *"Practice in relation to previous Regional Planning Guidelines (RPGs) and core strategies, has generally been to match future population targets to the physical extent of land being zoned for development, based on assumptions related to density and household occupancy. A more evidence based approach is now called for. Part of this more robust approach involves the preparation of a Housing Need Demand Assessment by each local authority (NPO 37). According to the NPF, "HNDA's are designed to give broad, long run estimates or what future housing need might be, rather than precision estimates" (p.96).*

HNDA are part of the evidence base to support decisions about new housing supply but cannot predict what occurs nor the complexity of the housing market which involves a number of key stakeholders. As outlined by NPO 36, *"new statutory guidelines, supported by wider methodologies and data sources, will be put in place under Section 28...to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels" (p.95).*

In the absence of official Guidelines, it is submitted that the preparation of the HNDA is only the first step and source of evidence to inform plan-making and decision-taking, and the identification of a 6-year supply of housing land. The full assessment should involve a process whereby-

- Sites with potential for development are identified
- An assessment is undertaken of their development potential
- An assessment is undertaken of their suitability for development and availability and the likelihood of development coming forward.

The information provided by the HNDA must be balanced with proactive land management which requires realistic prioritisation, proper monitoring and effective co-ordination across regional, metropolitan, city and county levels as sought by the NPF and RSES. Much closer attention will need to be paid to actual delivery. A site should only be considered available for development to meet the identified need when, on the best information available (confirmed by information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. An overall risk assessment should be undertaken as to whether sites will come forward as anticipated and what happens if they do not. In this way, the Planning Authority can then ascertain that the future supply of land as identified by the zoning maps is **suitable, available and achievable**.

Policy Objective HOU 7 clearly states that the HNDA will require review in accordance with forthcoming guidance issued by the Department. The Strategic Reserve land use zoning applied to the submission lands and other lands in Dundalk is unfounded and in direct conflict with the evidenced based approach of the National Planning Framework and Regional Spatial and Economic Strategy which places greater emphasis on actual delivery of housing.

9.0 CONCLUSION

The submission lands are in close proximity to the Dundalk Train Station and local services. As identified tier 2 lands within the settlement boundary of Dundalk, they can be serviced within the lifetime of the Development Plan and contribute to the consolidation of urban area. The submission lands extending to c.7.55ha are key to the achievement of the Policy Objective MOV 39 that supports the provision of a link road from the R934 Castleblaney Road to R178 Carrickmacross Road as indicated on the zoning map and will release lands within the Mount Avenue Masterplan Area. The construction of this planned road infrastructure will not be viable if lands it serves are not zoned for development. The implementation of this road objective will be led by construction, and in particular housing construction. If the lands the route passes through is not zoned, this objective cannot be achieved.

It is acknowledged that the National Planning Framework intends to issue updated Statutory Guidelines under section 28 of the Planning and Development Act 2000 to assist Local Authorities in the preparation of their Development Plans and Core Strategies and applying an order of priority (NPO 73a). In the absence of this Section 28 Guidance, it is submitted that the best strategy for Dundalk is to reinstate the residential zoned lands to allow for an order of priority to be applied by the Urban Area Plan and/or when formal guidance is issued. In the meantime, a plan, monitor, manage approach should be taken.

Yours Faithfully,

Stephen Ward

APPENDIX A – TECHNICAL NOTE BY WATERMAN MOYLAN CONSULTING ENGINEERS

TECHNICAL NOTE

Project:	Carrickmacross Road, Mount Hamilton, Co. Louth	Job No:	20-122
Subject:	Summary Engineering Assessment	Revision:	0
Prepared by:	Stephen Dent-Neville	Date:	18/12/2020
Checked by:			

18/12/2020

Introduction

This technical note has been prepared by Waterman Moylan in support of a submission to the draft Louth County Council Development plan 2021 – 2027.

The lands which are the subject of the submission are located off the Carrickmacross Road in Mount Hamilton, Co. Louth, to the west of Dundalk. This technical note reviews the engineering infrastructure available to service the proposed development of the lands in terms of road access, foul water drainage, surface water drainage and water supply.

Road Access

The proposed development site is located on the northern side of the Carrickmacross Road (R178), approximately 400m east of the M1 Motorway, as shown in the Figure below:



Figure 1 | Site Location (Source: Google Maps)

Road access to the subject lands can be provided from the Carrickmacross Road. The posted speed limit is 60km/hr in front of the site and to the east, increasing to 80km/hr immediately west of the site. There is adequate road frontage on Carrickmacross Road to achieve required sightlines.

There is an existing footpath along the northern side of the Carrickmacross Road, extending from Dundalk town centre as far as the subject site, and terminating at the western boundary of the site.

Foul Water Drainage Network

There is an existing 150mm and 225mm diameter combined sewer along the Carrickmacross Road which drains towards Dundalk approximately 50m to the east of the subject site. See Figure 2 below:-



Figure 2 | Existing Foul Water Drainage Network

The foul water drainage network is controlled by Irish Water. In order to ascertain the availability of capacity in the network a Pre-Connection Enquiry would need to be submitted to Irish Water. In the event that there are capacity constraints a suitable solution would need to be identified and agreed with Irish Water. Notwithstanding this the existing foul infrastructure does exist adjacent to the site to allow a physical connection to be made. It is assumed that any potential issue with capacity can be resolved through engagement with Irish Water.

Water Supply Network

The water supply records for the area, developed by Irish Water and provided by Louth County Council, are extracted below:

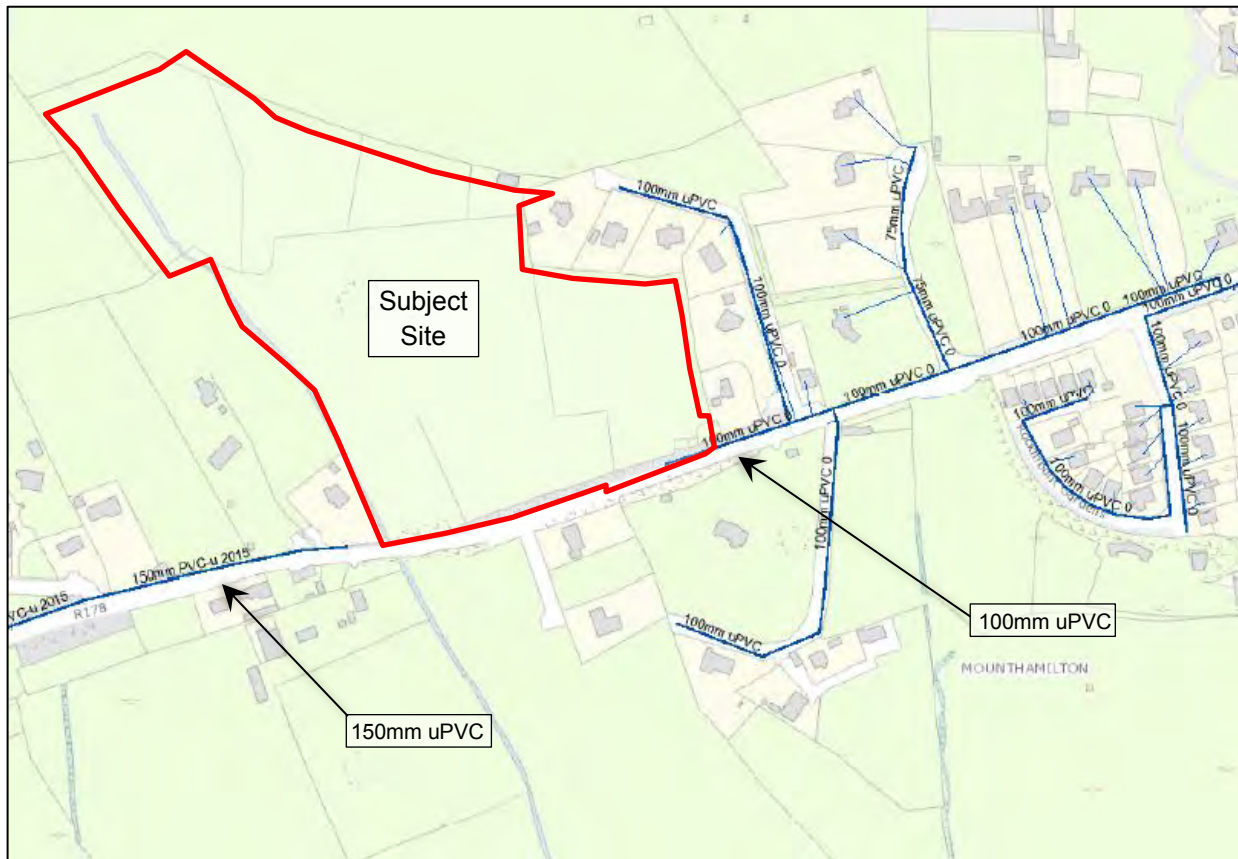


Figure 3 | Existing Water Supply Network

There are two watermains near to the subject site: a 100mm diameter uPVC watermain at the east of the site and a 150mm diameter uPVC watermain to the west of the site, both in Carrickmacross Road. The 150mm watermain terminates c.25m west of the site boundary and would need to be extended to facilitate a connection for the site.

The proposed development site can be serviced by a connection to one or both of these existing watermains.

Surface Water Drainage Network

The development site slopes generally from the north-east towards the south-west. There is an existing ditch network draining towards the south of the site.

As part of the nearby Mouth Hamilton development a large diameter surface water sewer was constructed from Carrickmacross Road through the Mount Hamilton development. The purpose of this large diameter sewer was to cater for lands to the North of Carrickmacross Road. The subject site can drain to the Carrickmacross Road and connect to this large diameter surface water pipe.

Any development on the subject site will be designed to incorporate best drainage practice, and in this regard should incorporate a Storm Water Management Plan promoting the use of various SuDS techniques to treat and minimise surface water runoff from the site. The methodology involved in developing a Storm Water Management Plan for the subject site should be based on recommendations set out in the Greater Dublin Strategic Drainage Study (GSDSDS) and in the SuDS Manual (Ciria C753).

The targets of the SuDS train concept should be implemented based on three key elements: controlling surface water runoff quantity, improving and protecting surface water runoff quality, and providing public

amenity. The first objective will be to discharge as much surface water back to ground as possible if the underlying ground conditions are suitable for percolation. In the event that ground conditions are unsuitable for percolation, then the surface water can be discharged to the existing surface water drainage infrastructure.

Any surface water discharging from the site to the public surface water network would be discharged at a controlled rate, limited to the greenfield equivalent runoff rate. Attenuation storage would be provided to store excess runoff, to enable the discharge rate from the site into receiving waters to be restricted accordingly. Outflows should be restricted by way of a hydrobrake or similar approved flow control device.

Conclusion

The proposed development site is well located in terms of proximity to existing services and road access.

Development of the proposed site can be served by road access from Carrickmacross Road.

There is an existing combined sewer on Carrickmacross Road, which can facilitate a connection from the development site. Capacity in the drainage network would need to be established by way of a pre-Connection Enquiry to Irish Water.

There are two existing watermains on Carrickmacross Road, and it is considered that one or both of the existing watermains can serve development on the subject site.

Surface water drainage will be designed in accordance with the principles of Sustainable Drainage Systems (SuDS). Surface water runoff from the site will, where suitable, be discharged back to ground should the ground conditions permit. Otherwise, the surface water runoff will be restricted to the existing greenfield runoff rate before discharging to the existing large diameter sewer at the entrance to the Mount Hamilton residential development.

In summary it is considered that the subject site can be adequately serviced to facilitate development on the site.