

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.

22nd of December 2020

Dear Sir/Madam,

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

Yack Unlimited Company 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 Ardee Road, Mounthamilton, 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 Yack Unlimited Company are attached. In summary this submission seeks to restore the residential zoning of the submission lands and ensure flexibility is provided for in the Core Strategy and Housing Strategy for the growth of Dundalk.

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1.0 SITE LOCATION AND CURRENT ZONING OBJECTIVES



Figure 1 – Approximate boundary of Submission Lands outlined in red (Source Google Earth)

The submission lands are located to the west of Dundalk Town Centre and south of the existing Mounthamilton housing development. These lands have approximately 400m of site frontage onto the Ardee Road (R171) to the south and are bound by housing to the east and agricultural lands to the north east and west. The lands are characterised by field boundaries and extend to approximately 22hectares. The majority of these lands are low lying and located in Flood Zone A in the OPW CFRAM Study as identified by Map 1.2 of the Draft Louth County Development Plan.

This submission seeks the lands zoned 'Residential 2' by the Dundalk and Environs Development Plan to be reinstated to support the provision of community facilities, a public park and strategic road infrastructure in the area identified by the draft Development Plan. Any future development proposals would be subject to a site specific flood risk assessment as detailed in the attached Technical Note by Waterman Moylan Consulting Engineers at Appendix A.

2.0 CURRENT AND PROPOSED ZONING OBJECTIVES

The submission lands are currently subject to four different zoning objectives under the Dundalk and Environs Development Plan 2009-2015 as illustrated by figure 2 below including c. 10ha of Residential zoned lands. The subject lands are also affected by a reservation area for a new road as part of the Western Infrastructure.

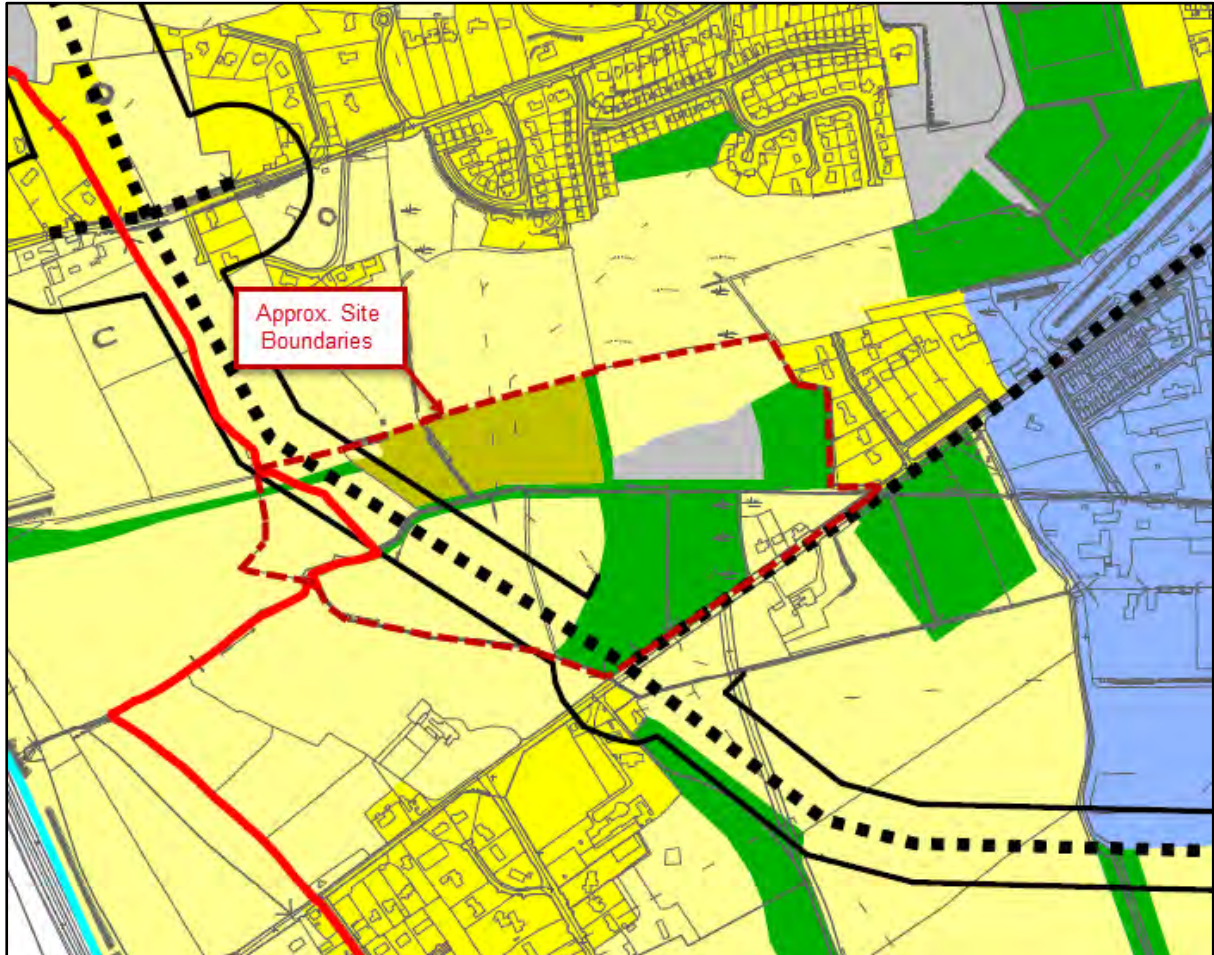










Figure 2 – Extract from Map 1 of the Dundalk and Environs Development Plan 2009-2015

 Residential 1	 Recreation, Amenity and Open Space
 Residential 2	 Community, Education and Recreation
 New and Improved Road Network	 Civic and Community Centre
 Former Dundalk Town Council Boundary	 Submission Lands

The draft Louth County Development Plan 2021 contains a Draft Zoning and Flood Zones Map for Dundalk (Map Number 2.1). This map indicates that it is intended that the areas currently zoned ‘Recreation, Amenity and Open Space’ will be zoned ‘H1 – Open Space’ while the area currently zoned ‘Civic and Community Centre’ will be rezoned ‘G1 Community Facilities together with lands currently identified as ‘Community, Education and Recreation’. Lands currently zoned ‘Residential 2’ have been rezoned ‘L1-Strategic Reserve’.

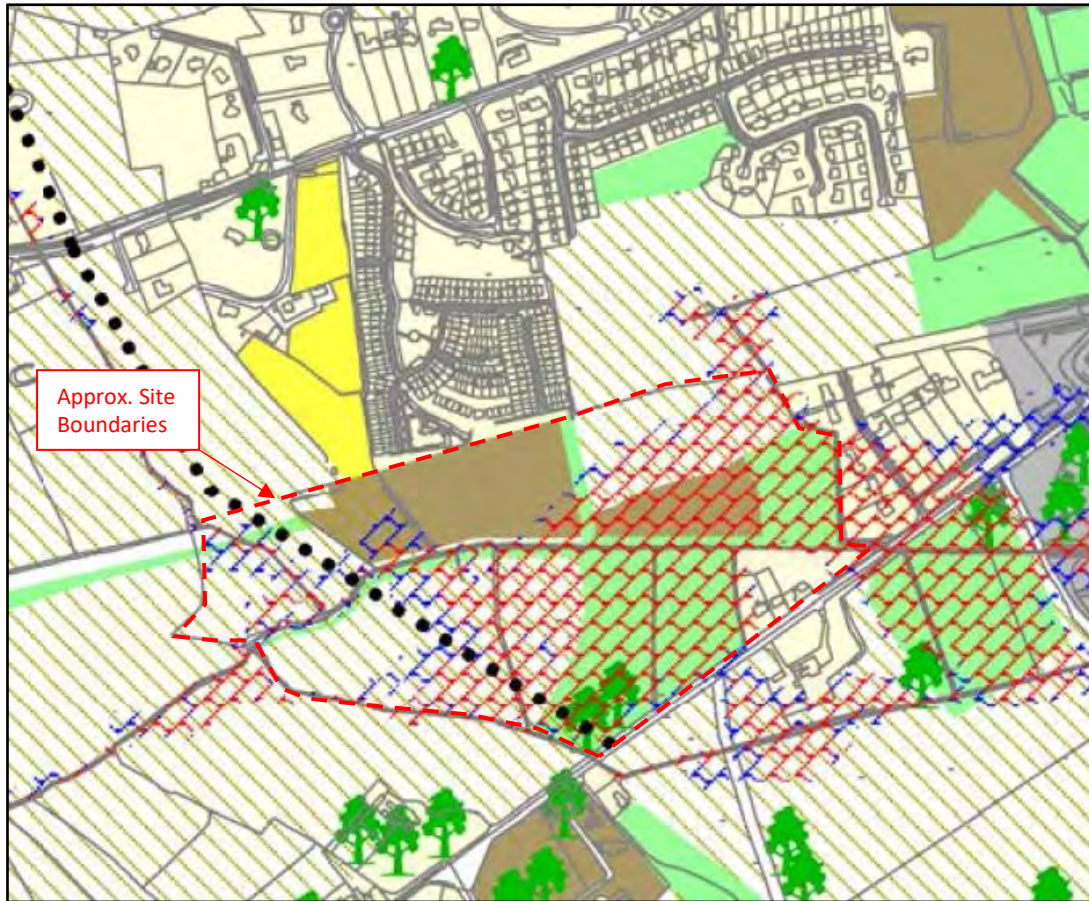


Figure 3 – Extract from the Draft Louth County Development Plan, Dundalk Draft Zoning and Flood Zones, Map 1.2

3.0 STRATEGIC RESERVE LANDS ARE CONFLICT WITH THE ACHIEVEMENT OF PLAN OBJECTIVES

Roads Objectives: Table 7.4 of the draft Plan lists ‘Key Road and Bridge Projects’ for the Plan period including a ‘Link Road from R178 Carrickmacross Rd to R171 Old Ardee Road’. It is the policy of the draft Plan-

“To support major road and bridge improvement projects set out in Tables 7.3 and 7.4 and any other project identified by the Council or included in the Roads Programme by reserving the corridors, as and when they are identified, of any such proposed routes, free of development, which would interfere with the provision of such proposals” (Policy Objective MOV 39).

“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” (Policy Objective MOV 44).

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 are not zoned, this objective cannot be achieved.

Community Facilities: a significant portion of the submission lands have been zoned 'G1-Community Facilities' in the draft Plan where the objective is "To provide for and protect civic, religious, community, education, health care and social Infrastructure" (para. 13.19.19). The majority of lands surrounding these lands zoned for Community Facilities are zoned L1-Strategic Reserve or H1-Open Space. Only a relevantly small area of land (c.2ha) to the north of the submission lands is zoned A2-New Residential. It is submitted that the area of proposed A2 lands and existing residential development in the immediate area do not provide the critical mass needed to support the provision of community facilities in this location.

The Dundalk and Environs Development Plan includes an objective to provide for new residential development in accordance with the South West Local Area Plan (SWLAP) (Table 2.1). It is acknowledged that it is a Regional objective to prepare an Urban Area Plan for Dundalk. However, in the absence of a new UAP, the County Plan is pre-emptively dismissing the SWLAP by de-zoning essential all residential lands within the LAP area. In selecting the location for civic and commercial centres as well as school sites in the South West Area, the 2006 Local Area Plan stated that the Civic and Commercial centres must be developed on a basis commensurate with a demonstrated need within their respective catchments. It was recognised that the provision of civic and commercial centres would require the building of a sufficient critical mass of population (p.14, SWLAP). It is submitted that it is unviable to provide large areas of open space and community facilities with no residential neighbourhoods to support them.

Public Open Space: The provision of a large public park within the submission lands has long been an objective of the Dundalk and Environs Development Plan and was also detailed in the South West Local Area Plan (2006). The computer generated images overleaf provide an idea of how the submission lands could be developed to provide residential and community facilities with the benefit of a large public park fronting onto the Ardee Road. It also highlights how future development would relate to the link road in terms of urban form. Residential development is central to the achievement of a viable and mixed use sector which could all be provided within the submission lands if the L1-Strategic Reserve zoning was removed and 'Residential' zoning reinstated.



Plate 1: CGI aerial view looking north east with Mounthamilton residential development to the north of the submission lands



Plate 2: CGI aerial view looking north west with Mounthamilton residential development to the north of the submission lands illustrating the relationship of potential future development with the link road.



Plate 3: CGI aerial view looking east towards Dundalk town Centre with Mounthamilton residential development to the north of the submission lands illustrating the relationship within the existing urban area.

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 choice and alternative lands for residential development over the Plan period and could restrict the growth of Dundalk.

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.

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 and growth envisaged by the RSES.

5.0 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 submission lands are capable of being serviced as outlined in the attached Technical Note by Waterman Moylan Consulting Engineers (Appendix A).

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. 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).

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”.

In keeping with National Policy, lands identified as Tier 2, including the submission lands, can be zoned for development within the lifetime of the Development Plan. It is submitted that the greatest flexibility would be to zone Tier 2 lands for development within the Plan period and monitor the residential development permitted in Dundalk 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.

6.0 ORDER OF PRIORITY

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).

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. 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.

The Land Use Evaluation 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.

The Land Use Evaluation highlights the lack of national guidance in this area. The predetermined assessment criteria inevitably lead to low scores for any sites outside the town centre or do not contribute to infill or backland development. It is submitted that the system adopted is unsuited to application in Dundalk as a growth centre. It is unclear how it has aided the identification of New Residential lands either, 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).

It is disconcerting that such a broad brush approach has been taken to the assessment of 'sites' in the Infrastructure Assessment and Land Evaluation. The submission lands fall within 'Site 11', but this is not a 'site' at all but a huge area extending to nearly 400hectares. The area is in multiple ownerships and has varying characteristics from topography to availability of infrastructure and specific environmental considerations. It is submitted that the area assessed is too wide to be considered as a tiered site assessment and it would be inappropriate to apply an order of priority on this basis.

7.0 RELEASE OF ALTERNATIVE LANDS

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).

The draft Plan identifies the majority of A2 lands proposed to be located in the Mount Avenue area south of the Castleblaney Road. However, there has been no assessment of the availability of these lands to be developed within the Plan period. Should these lands not come forward, the application of the Strategic Reserve zoning objective precludes the opportunity for alternate lands to be released within the Plan period.

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 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 of the Draft Plan 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 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. In the absence of National Guidelines, the L1-Strategic Reserve zoning objective should be removed from the zoning objectives for Dundalk.

9.0 CONCLUSION

The submission lands offer the opportunity for a mixed use development that will provide community facilities, a public park and strategic road infrastructure. The application of an L1-Strategic Reserve zoning objective within the submission lands conflicts with the achievement of the objectives on the balance of the landholding.


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:	Ardee 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:	Joe Gibbons	Date:	18/12/2020
Approved by:		Date:	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 Ardee 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 Ardee Road (R171), approximately 500m 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 Ardee Road. There is adequate road frontage from the site onto the road to achieve required sightlines.

There is an existing footpath along the northern side of the Ardee Road, extending from Dundalk town centre as far as the subject site, and terminating c.200m west of the site at the junction with Knockbridge Road.

Foul Water Drainage Network

Irish Water drainage records for the area have been provided by Louth County Council and are extracted below:

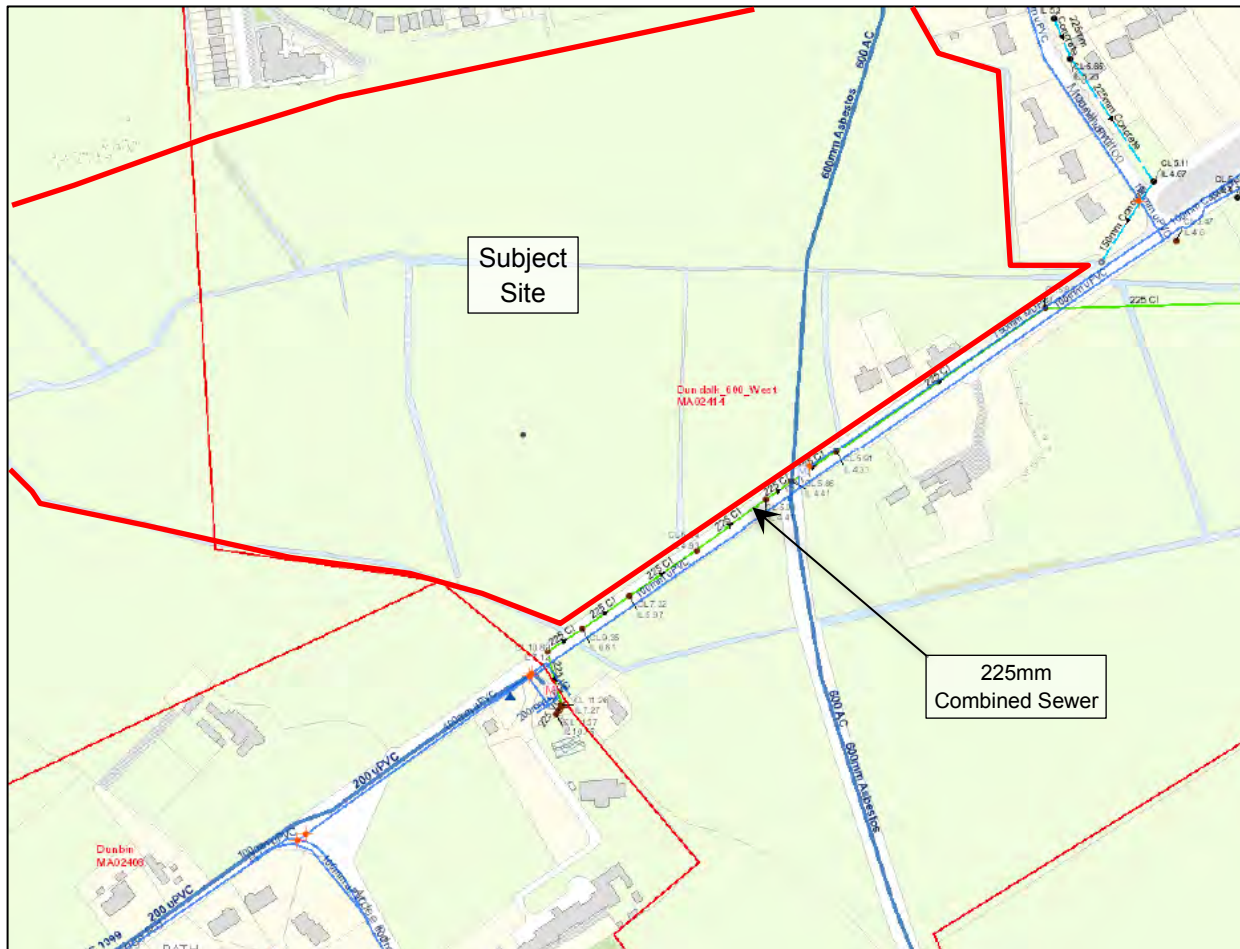


Figure 2 | Existing Foul Water Drainage Network

The Irish Water drainage records indicate that there is an existing 225mm diameter combined foul and surface water sewer running along Ardee Road, discharging in a north-easterly direction. This combined sewer serves the existing dwellings to the north and south of the Ardee Road.

We understand that the existing combined sewer has drainage constraints and is not suitable for development of the subject lands. A foul drainage solution would need to be established with Irish Water to facilitate the development of the site. This may require upgrade works to the existing sewer, laying a new sewer along Ardee Road or constructing a pumping station to discharge waste water to the public sewer closer to Dundalk.

Private foul and surface water drainage will be drained on completely separate systems throughout the development, regardless of whether the solution established with Irish Water involves the introduction of separate systems in the adjacent public network.

Water Supply Network

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

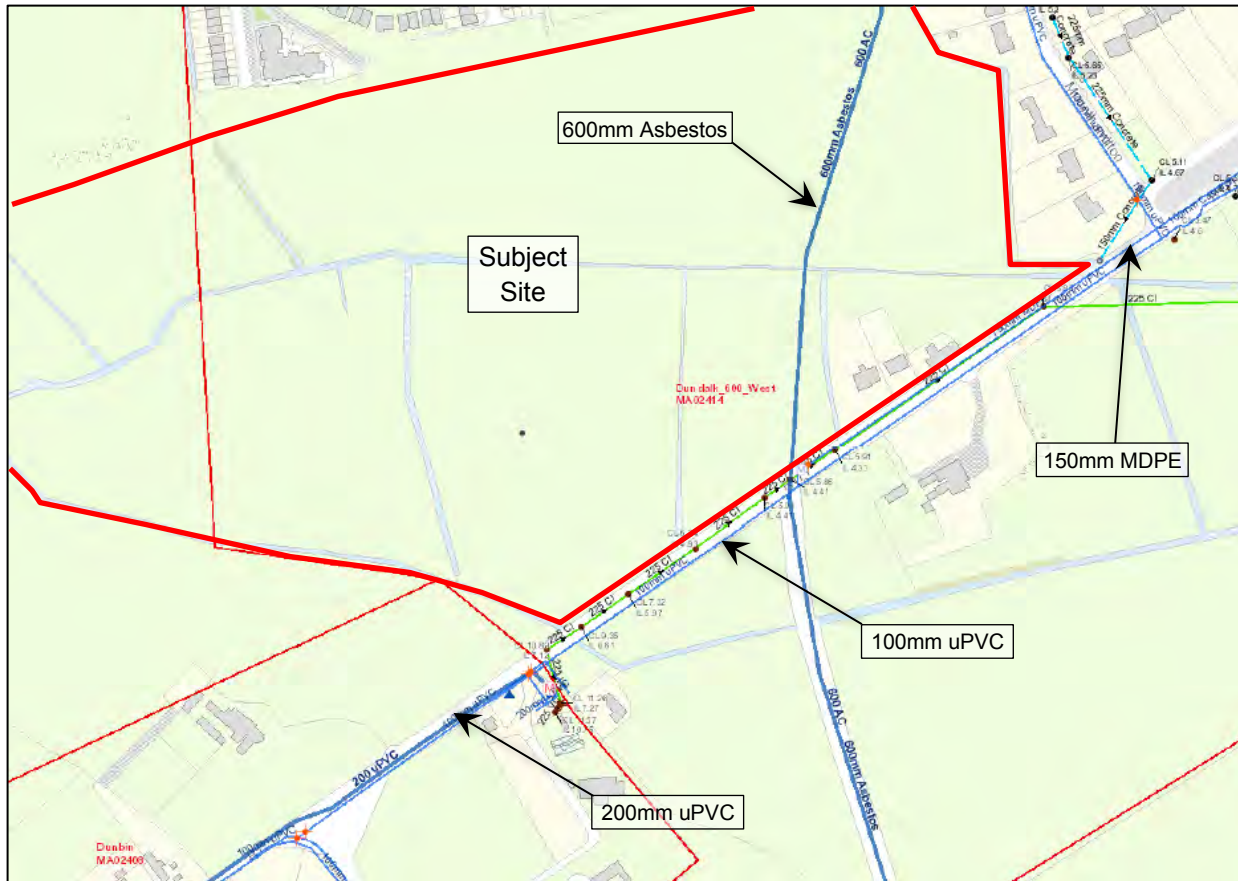


Figure 3 | Existing Water Supply Network

As shown in the figure above, the subject site is well served by water supply infrastructure. There is an existing 100mm diameter uPVC watermain on Ardee Road in front of the site, and an existing 150mm MDPE watermain in Ardee Road at the eastern portion of the site, which serves the existing dwellings. There is a 200mm uPVC watermain in Ardee Road and Knockbridge Road to the south-west of the site.

The proposed development site can be serviced by one or more connections to these existing watermains.

There is also a 600mm Asbestos trunk main which traverses the site. A suitable wayleave will be required on either side of this watermain, subject to agreement with Irish Water, or alternatively the main could be diverted as part of any development on the site, subject to a diversion agreement between Irish Water and the developer.

Surface Water Drainage Network

The subject lands are currently drained by an existing ditch network. As noted above, the only sewer in the immediate area is an existing 225mm diameter combined foul and surface water sewer running along Ardee Road, discharging in a north-easterly direction.

There is an existing watercourse flowing through the site. It is proposed that development of the subject site will discharge surface water to this existing watercourse. Development on the subject site will be designed to incorporate best drainage practice, and in this regard should incorporate a Storm Water

The map indicates that a significant portion of the subject site is subject to flooding. However, there are areas at the north-west and at the south-east of the site that are not susceptible to flooding during a 1-in-1,000-year flood event. These areas are suitable for development.

Those portions of the site which are within the 1-in-1,000-year flood zone can be considered for uses which are not vulnerable to flooding, such as parking, open spaces, playing fields, etc.

Alternatively, these areas can be considered for development, subject to a site specific flood risk assessment and appropriate mitigation measures being implemented.

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 Ardee Road (R171).

There is an existing public combined sewer on Ardee Road – however, capacity constraints in this sewer have been identified. It will be necessary to agree a suitable solution for the discharge of wastewater from the proposed development site with Irish Water.

There are existing watermains on Ardee Road. It is considered that these 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 be discharged to the existing watercourse which passes through the site. Surface water runoff will be restricted to the equivalent of the existing greenfield runoff rate before discharging to the existing watercourse.

The development site is subject to flooding however there are areas of the site which are outside Flood Zone A and B and are not susceptible to flooding during a 1 in 1000 years flood event. These areas are suitable for development. Areas of the site which are within the 1 in 1000 year flood event can be considered for uses which are not vulnerable to flooding, i.e. parking, open space/playing fields etc.

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