

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

Date: 22nd December 2020

Dear Sir/Madam,

RE: SUBMISSION TO THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 ON BEHALF ON THE ARDEE PARTNERSHIP

1. Introduction

- 1.1 On behalf of our client, The Ardee Partnership, we wish to make a submission in respect of the draft Louth County Development Plan 2021-2027 published on 14th October 2020.
- 1.2 We welcome the opportunity to make a submission on the draft County Development Plan on behalf of our client who are broadly supportive of the content of the draft Plan and particularly how this relates to our client's lands at Bridgegate, Ardee.
- 1.3 Our client is currently on site at Bridgegate, where a development of 159 no. residential units, crèche, community building and public open space in the form of a Public Park of c. 4.91ha is under construction and nearing completion (in the initial phases). This development has introduced improved infrastructure facilities which can enable the future sustainable growth of Ardee.
- 1.4 Our client has brought forward proposals for a Strategic Housing Development on lands adjoining the initial phases at Bridgegate and has held formal pre-application discussions with the Planning Authority and submitted a formal Pre-Application Consultation Request with An Bord Pleanála, with a tripartite meeting held on 4th December. The proposals will enable the logical growth of the town. Our client is committed to developing the remaining lands zoned 'A2 – New Residential' at Bridgegate within the lifetime of the new Plan by 2027.
- 1.5 The location of the lands in ownership of our client are shown below in Figure 1.

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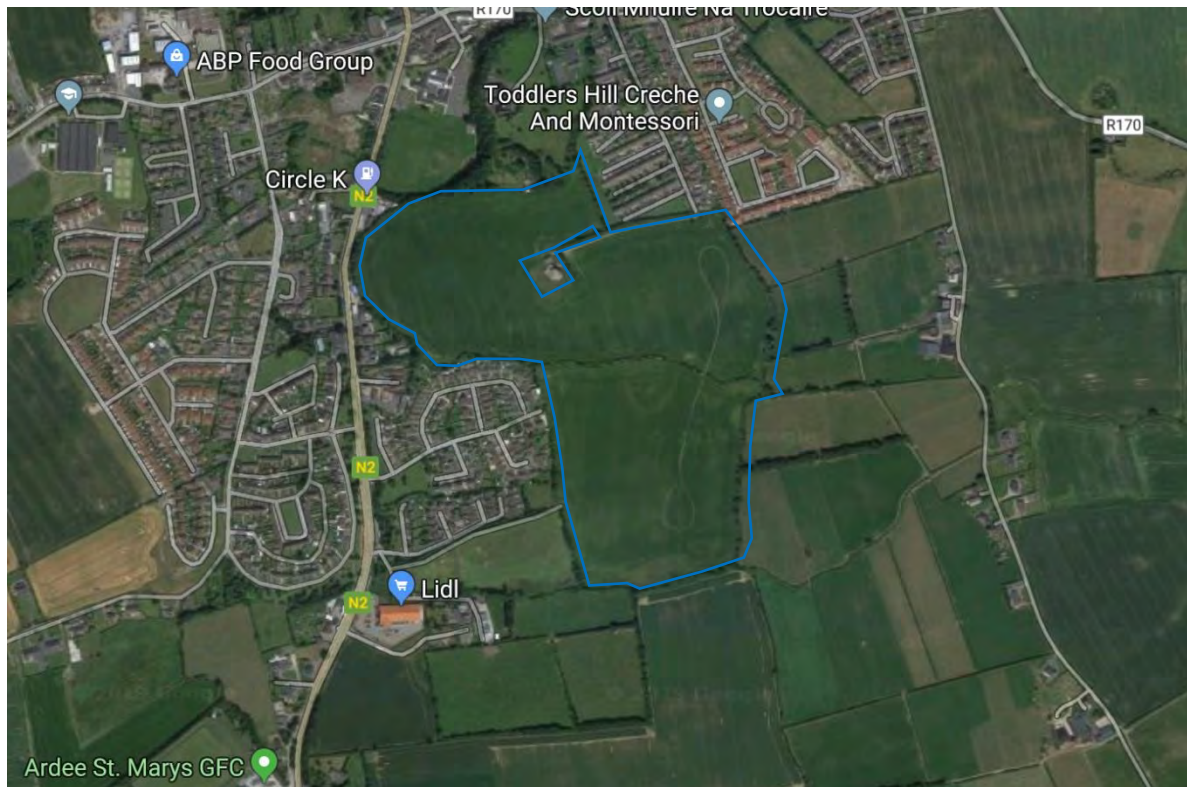


Figure 1: Indicative Location & Ownership Boundary (Source: Google Maps)

1.6 Our client is committed to the future sustainable growth in Ardee and is supportive of the proposed zoning and specific local objectives for the subject lands, as well as specific policies as they relate to the site. These are discussed in turn below.

2. Chapter 2 - Core and Settlement Strategy

Strategy

- 2.1 Ardee is identified as a 'Self-Sustaining Growth Town' in the draft CDP, in the context of the settlement hierarchy set out by the Regional Spatial & Economic Strategy for the Eastern & Midland region. A Self-Sustaining Growth Town is considered to have 'a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining'. Ardee is located in the Core Region peri-urban hinterlands within the commuter catchment around Dublin within the RSES.
- 2.2 The RSES identifies infrastructure improvements at the N52 Ardee bypass and the N2 Ardee to Castleblaney which will enable Ardee to accommodate appropriate population and housing growth in the next Plan period and beyond.
- 2.3 The Strategic Objectives set out at 2.4.1 of the draft Core Strategy seeks to:
- Ensure development and growth in line with NPF and RSES objectives;
 - Support population growth in accordance with population projections set out in the NPF Implementation Roadmap and the Settlement Hierarchy and Core Strategy;
 - Align infrastructure investment with those settlements identified for growth in the Settlement Hierarchy;
 - Ensure sustainable growth of towns at a sustainable level; and
 - Provide clarity to developers.

2.4 Further to the above, Louth's Growth Strategy is set out at 2.4.4 and in relation to Ardee seeks to:

- Support the Self-Sustaining Growth Towns of Ardee and Dunleer, which are regionally important local drivers providing a moderate level of jobs and services for the resident population and surrounding catchments. Growth will be balanced and at sustainable levels including brownfield and infill development with a focus on the commensurate delivery of employment and services and improving the quality of life for all in these towns.

2.5 Our client is supportive of the above strategic objectives of the draft Louth CDP. The appropriate development of the The Ardee Partnership owned lands in Ardee will align with the Core Strategy and Growth Strategy objectives and will implement sustainable growth at the location, as well as delivering vital infrastructure in the form of community facilities, crèche, public park and route through the lands.

Population Growth

2.6 Relative to population distribution, the draft Plan notes the population of the County is distributed across a network of urban and rural settlements and the open countryside, with Self-Sustainable Growth Towns accounting for 5.3% of the County Population. The draft Plan notes Ardee as an *'important local driver'* and *'with continued commensurate growth, will become more self-sustaining into the future'*, projecting 7.9% of the population growth to 2027 taking place in Ardee. Table 2.9 of the draft CDP sets out the population projections and distribution by settlement, shown below.

Table 2.9: Population Projections & Distribution by Settlement Category, County Louth

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I
Settlement Category	Settlement	Census Population 2016	Projected Population 2027	Projected increase in Population	Population Increase 2002-2016	Annual Average Population Increase p/a 2002-2016	Projected average Population Increase per annum 2016-2027	Projected % of Total Growth Rate 2021-2027
Self-Sustaining Growth Towns	Ardee	4,928	6,583	1,655	980	70	150	7.9%
	Dunleer	1,822	2,757	935	808	58	85	4.4%

2.7 The table sets out a projected population of 6,583 in Ardee by 2027, in accordance with the town's status in the settlement hierarchy and potential for growth. This equates to a projected increased in population of 1,655 in the period between 2016 and 2027. Our client is supportive of the projected growth allocated to Ardee which is considered appropriate having regard to the location of the town and its proximity to strategy transport links at the nearby M1 and the planned N2 bypass as set out by the RSES.

Housing Growth

2.8 Population projections influence housing allocations, with the draft CDP estimating a 6,271 increase in the number of households in the county in the next Plan period. It is worth noting that c. 2,040 units have been completed in County Louth in the period 2016-2020, emphasising the needs for increased construction to meet identified housing demand across the county. The draft Plan targets the construction of c.1,380 units per annum over the course of the plan.

2.9 The Core Strategy allocates 584 new dwellings to Ardee within the next Plan period 2021-2027 to accommodate the projected 1,655 increase in population. Section 2.6.6 of the Core Strategy notes that *'Louth is required to deliver at least 30% of all new homes within existing built up footprints'* in accordance with National Policy Objective 3c. Our client's lands at Bridgegate, Ardee are located within the existing settlement

envelope and are well placed to deliver housing in compliance with this national objective.

2.10 Table 2.14 of the draft Louth CDP 2021-2027 as it relates to Ardee is set out below.

Table 2.14: Core Strategy Table

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L
Settlement Category	Settlement	Population 2016	Projected Population Increase to 2027	Projected Population 2027	Total Projected Housing Stock 2027	Total Additional Housing Units 2016-2027	Approx. Units Completed 2016-2020	Housing Allocation 2021-2027	Lands with potential to deliver Infill or Brownfield Development (ha)	Units delivered on Infill/Brownfield Lands	Total Lands Zoned for New Residential uses (ha)
Self-Sustaining Growth Towns	Ardee	4,928	1,655	6,583	2,751	749	165	584	8.5	298	54.6
	Dunleer	1,822	935	2,757	1,144	425	80	345	3.1	109	13

- 2.11 Our client is supportive of the housing allocation designated to Ardee which is considered appropriate in order to ensure the sustainable growth of the settlement in the period to 2027.
- 2.12 The Ardee Partnership holds extant permission for 158 no. dwellings at the initial Phases 1-3 at Bridgegate. A total of c. 56 units have been completed to date, with construction ongoing. The permitted development also includes the provision of roads and social infrastructure, include a crèche, community building and a substantial area of public park at Mulladrillen Hill in accordance with the objectives of the Ardee Local Area Plan 2010-2016 and the draft Louth County Development Plan 2021-2027.
- 2.13 Our client is currently progressing proposals for 278 no. dwellings at Phase 4 of the development at Bridgegate (including the replacement of 41 no. permitted units), which would provide a total of 405 units at the overall site. Extended road connections, an enlarged crèche and the completion of the c. 7ha park at the location are included within the proposals, providing high quality community infrastructure aligned with the objectives of the draft Louth CDP.
- 2.14 As noted above, our client is committed to developing the remaining lands zoned 'A2 – New Residential' at Bridgegate within the lifetime of the new Plan by 2027.
- 2.15 Our client is supportive of the Core Strategy Policy objectives, and those particularly relevant to Ardee, listed as follows:
- CS 11** *To prepare a new Local Area Plan for Ardee in line with the Core Strategy and in recognition of Ardee's role as a regionally important local driver and Self-Sustaining Growth Town in the Settlement Strategy.*
- CS 13** *To ensure proportionate, contained and compact growth within the Self-Sustaining Towns identified in the Settlement Hierarchy, with focused investment in green industry, services, infrastructure and employment whilst balancing housing delivery.*
- 2.16 The extant permission and proposed development at our client's lands at Bridgegate, Ardee aligns with the policy objectives of the draft Core Strategy and will facilitate the sustainable growth of the settlement in accordance with its status in the settlement hierarchy.

Settlement Hierarchy

- 2.17 Section 2.15 of the draft CDP details Ardee's status as a Self-Sustaining Growth Town which plays an important local service centre in mid-Louth. The town possessed over 1,700 jobs in 2016, with and a high job:workforce ratio of 0.93 noted as '*an indication of the strong employment base in the town*'. In this respect, housing provision is expected to support the employment uses in the town and to enable its sustainable development.
- 2.18 The draft settlement statement notes the town's attractive location for growth and investment due to its connectivity and accessibility in the context of the national road network and public transport links as well as to local centres of employment via the N52. The CDP plans to '*expand its employment base and facilitate sustainable residential growth that would meet the needs of a localised demand*', with sequential growth prioritised. The planned upgrade of the N2 and N52 is expected to '*transform Ardee town centre and would remove through traffic from the urban core*'. Our client is supportive of the proposed upgrade of roads infrastructure and seeks to assist with the removal of traffic from the town centre by facilitating a route through the Bridgegate lands under ownership to link to the lands to the east.
- 2.19 The Strategic Settlement Strategy Policy Objectives for Ardee support the role of the settlement as a Self-Sustaining Growth Town and to facilitate a balance of population and economic growth.

- 2.20 **Policy SS 37** relates to density and is noted as follows:

To support the creation of a sustainable compact settlement in Ardee that provides opportunities for walking and cycling and to encourage a minimum density of 25 units/ha for new residential developments.

- 2.21 Our client is supportive of this policy and seeks to create a sustainable residential community at Bridgegate through an overall development of appropriate density which is commensurate to the existing and permitted residential densities on adjacent lands. This is considered to be consistent with the RSES which states relative to residential density, that '*there should be a graded reduction in residential densities for **Self-Sustaining Growth Towns, Self-Sustaining Towns, towns and villages that are commensurate to the existing built environment***'. In this respect, a development density of c. 30 units per hectare is considered appropriate in respect of our client's lands at Bridgegate given its edge of town greenfield location as noted at Figure 1 above.

- 2.22 **Policy SS 42** relates to our client's lands at Bridgegate:

To facilitate the provision of a new link road from Rathgory and Mulladrillen to Black Road.

- 2.23 Our client is supportive of this objective and seeks to address this through the provision of a link road through the lands as far as the eastern boundary of the lands in ownership to facilitate a future connection through third party land to the east. This is included in the proposed Strategic Housing Development on the lands which is current at formal Pre-Application Consultation stage with An Bord Pleanála.

3. Chapter 3 - Housing Strategy

- 3.1 Chapter 3 of the draft Louth County Development Plan sets out the housing strategy for the county, underpinned by a Housing Needs and Demand Assessment (HDNA) prepared in accordance with National Policy Objective 37 of the NPF. Our client is

supportive of the policy objectives set out in Chapter 3, including Table 3.2 in relation to recommended densities in Ardee as set out below.

Table 3.2: Recommended Densities in Higher Tier Settlements

Settlement Category	Recommended Minimum Density per Hectare	
	Town Centre	Edge of Settlement
Regional Growth Centres Dundalk and Drogheda	50	35
Self-Sustaining Growth Town Ardee and Dunleer	35	25

- 3.2 Lands under ownership of our client are at an Edge of Settlement location within Ardee and therefore a recommended density of 25 units per hectare minimum is considered appropriate.

4. Chapter 13 - Zoning

- 4.1 Section 13.19 of the draft CDP sets out the proposed Land Use Zoning Objectives with the purpose of promoting the orderly development of settlements within the county by *'eliminating potential conflicts between incompatible land uses, protecting resources and to establish an efficient basis for investment in infrastructure and facilities'*.
- 4.2 Lands under ownership of our client are zoned 'A2 – New Residential' and 'L1 – Strategic Reserve' in the Land Use Zoning Map for Ardee at Map 2.1 of the draft Plan. This is illustrated below in Figure 3, with lands outlined in blue.

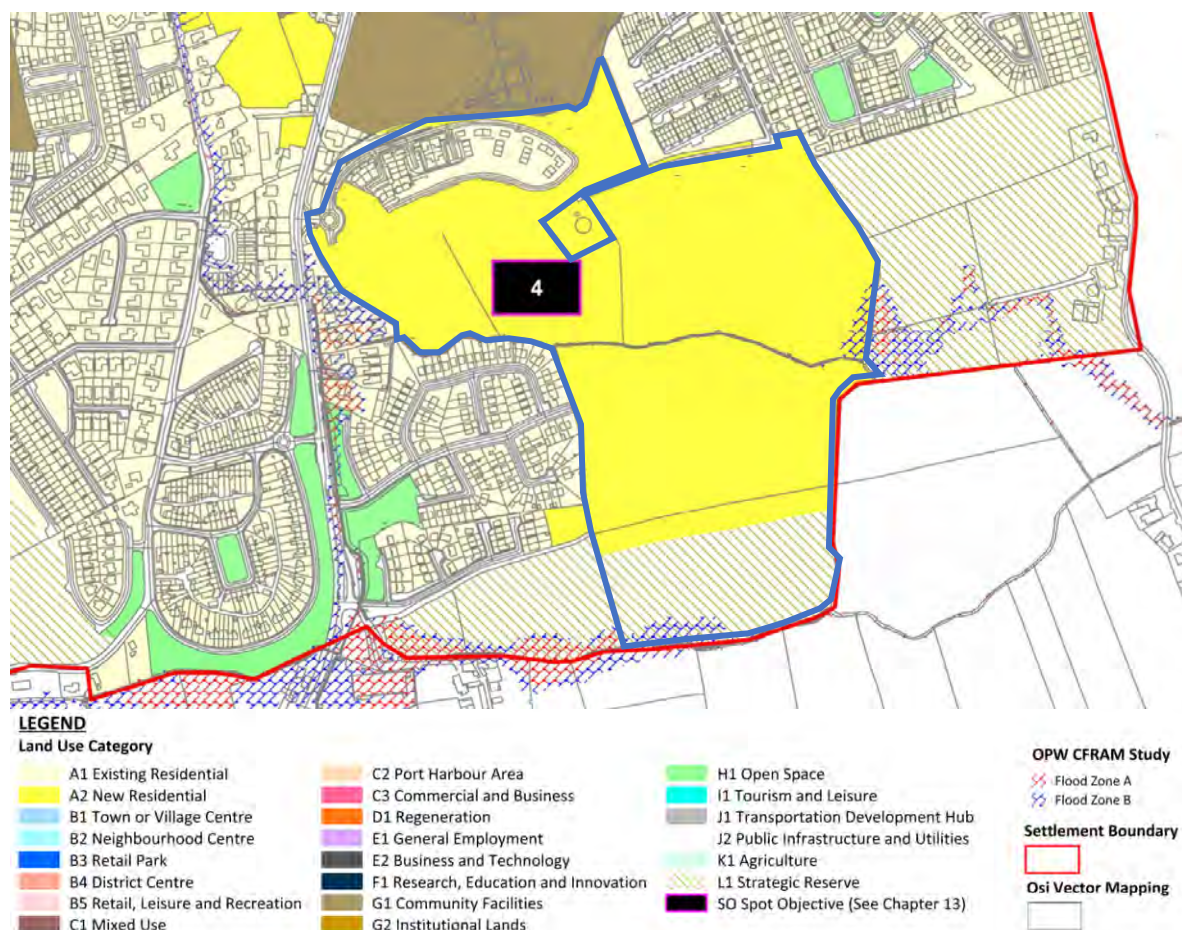


Figure 2: Location of Client Lands in Context of draft Louth CDP Land Use Zoning Map

- 4.3 A2 – New Residential zoning objective seeks to ‘provide for new residential neighbourhoods and support community facilities’. Accompanying text states that this ‘is the primary location for new residential neighbourhoods’ and development should be of high quality design and layout, appropriate mix and sustainable transport links, whilst density should be reflective of the location with high densities at more central locations. Community facilities are supported at A2 zoned lands.
- 4.4 ‘L1 - Strategic Reserve’ lands seek to ‘provide a land reserve for the orderly expansion of the settlement into the future’ and will generally not be available for development under post 2027.
- 4.5 Our client is supportive of the land use zoning objectives proposed by the draft CDP as it relates to lands under ownership. It is noted that our client is currently on site at the initial phases of Bridgegate and is fully committed to the build out of the extant permission and the future development of Phase 4, subject to a grant of permission by An Bord Pleanála. The proposed development of the lands within the area zoned A2 will support the objectives set out by the draft CDP and provide proportional infrastructure which responds to the needs of the future resident population at Bridgegate as well as the wider settlement.
- 4.6 It is noted that ‘Spot Objective 4’ is included on land under ownership of our client with the objective ‘To provide a public park with a minimum area of 12 acres (4.9 hectares) as part of a residential development’.
- 4.7 Construction is currently underway at Phases 1-3 at Bridgegate as permitted under Reg. Ref.: 10174; ABP Ref: PL15.238053, including the c. 3.72ha public park in this

area. The proposed SHD on lands adjoining include the planned provision of a c. 3.4 ha site extending to the east, which will exceed the provision required by the draft CDP and comply with Spot Objective 4. This area of high quality landscaped open space will provide for a range of activities for all residents, as well as being accessible to the wider population of Ardee.

Proposed Strategic Housing Development

- 4.8 As noted above, our client is engaged in formal Pre-Application Consultation with An Bord Pleanála following section 247 consultation with Louth County Council during 2020. It noted that the Planning Authority stated their support in principle for the proposed development and viewed this as a logical extension of the settlement. The proposal is summarised as follows:

The proposed residential development provides for 278 no. dwellings, in a sustainable mix of houses and duplex apartments, as well as a crèche, community centre and series of public open spaces which will comprise a significant central public park, access and infrastructure within an overall 12.99 hectares site in accordance with the Ardee Local Area Plan 2010-2016.

The proposals seek to provide a logical and sustainable extension of the settlement of Ardee and will make optimal use of the existing infrastructure at the 158 unit residential development at Bridgegate adjoining to the north west, granted under Louth County Council Reg. Ref.: 10174 (ABP Ref: PL15.238053) (as amended) and currently under construction by the applicant The Ardee Partnership. The proposals overlap the adjoining permitted development and will result in the replacement of 31 no. houses at this location, open space, as well as a community building and enlarged crèche, resulting in a total of 405 no. units across the total phases at Bridgegate upon a grant of permission.

- 4.9 It is noted that an area of the proposed development at its south eastern boundary is located within lands zoned 'R1 – Strategic Reserve', as shown on Figure 2. It is respectfully requested that the shading associated with the 'A2 – New Residential' zoning objective is marginally extended to encompass the area within the red line boundary as shown above into Maps 2.1 and 2.2 of the adopted Louth County Development Plan 2021-2027. Our client is committed to developing the remaining lands zoned 'A2 – New Residential' at Bridgegate within the lifetime of the new Plan by 2027 subject to a grant of 5 year planning permission for the proposed SHD.

5. Appendix 2 – Infrastructure Assessment and Land Use Evaluation

- 5.1 An assessment of undeveloped lands for residential potential within Ardee has been undertaken to inform the proposed zoning objectives set out in Figure 2 above. This has been undertaken in accordance with National Policy Objective 72a of the NPF which states '*planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that that is serviced and ii) zoned land that is serviceable within the life of the plan*'. The Tiered Approach is set out at Appendix 3 of the NPF and prioritises serviced lands which is sequential to existing residential uses.
- 5.2 In respect of the tiered approach, the lands under ownership of our client are considered to constitute 'Tier 1' lands as these are '*lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development*'. The lands are

also positioned within the existing built-up footprint of Ardee, contiguous to existing developed lands and are spatially sequential within the settlement.

- 5.3 This approach is consolidated by the RSES which notes that *‘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’*. This will include performance measures such as service capacity, patterns of housing delivery, sequential development of the town, and output and the take-up and completion of planning permissions. The recent upgrade of the wastewater treatment plant and water supply to the area has and will continue to enable the progress of the phased development of Bridgegate in the Plan period 2021-2027.
- 5.4 The Planning Authority has developed a traffic light system which highlights any deficiencies in the lands analysed in terms of infrastructure provision. 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.
- 5.5 The Planning Authority has also utilised a matrix approach based on other factors which are considered to indicate the suitability of a site for development. These are ranked on a 1-5 scale, with 1 being most optimal and 5 being least optimal. These are as follows:
- Proximity to town centre;
 - Contribution to the delivery of consolidated, compact growth;
 - Proximity shops/services;
 - Proximity to schools;
 - If the location of the lands will facilitate the delivery of infill or backland development;
 - Availability of public transport;
 - If there are any issues with flooding.
- 5.6 Our client’s lands at Bridgegate are identified at ‘Site 1’ in the Tiered Assessment Analysis, with the results shown below in Figure 4.

Land Use	RES	Land Use Evaluation	
Infrastructure Type	Site 1	Proximity to Town Centre	3
Roads	●	Contribute to Consolidated/Compact growth	4
Footpath	●	Proximity to Shops/services	3
Public Lighting	●	Proximity to schools	2
Water	●	Infill/Backland	4
Wastewater	●	Availability to public transport	1
Tier 1 or Tier 2	●	Flooding	1
		Total	18

Figure 4: Tiered Assessment Analysis of Client Owned Lands

- 5.7 Our client is broadly supportive of the assessment undertaken by the Planning Authority in formulating the results illustrated in Figure 4 (placing the site 4th of 9 assessed), however it is considered that the subject lands merit a ‘green light’ in respect of Roads

and Water. The recent upgrade of the water supply at the Irish Water reservoir at Mulladrillen Hill ensures good access to supply. This has been confirmed by Irish Water in their letter confirming feasibility for the proposed SHD at Bridgegate connecting to the existing water supply. The roads connections to the lands are currently being developed at part of the initial phases at Bridgegate, with a proposed route terminating at the eastern boundary of the lands under ownership of The Ardee Partnership shown above in Figure 3. This will facilitate future connections to the east of site in accordance with Policy SS 42 of the draft CDP which requires the provision of a link road between Rathgory and Mulladrillen and Black Road.

- 5.8 Furthermore, as noted above, the lands are considered to constitute 'Tier 1' lands in the context of the Tiered Approach set out at Appendix 3 of the NPF and merits a 'green light' in respect of this infrastructure type noted in Figure 4. Utilities are present at the location and the lands subject to pre-application consultation with An Bord Pleanála are contiguous to existing residential development at Cherrybrook to the west and to the permitted development at Phase 1-3 at Bridgegate. Phases 2 and 3 are anticipated to be complete by 2022, further enhancing the infrastructure access to the remaining lands.
- 5.9 A recent review of zoned residential lands in Ardee notes a shortfall in delivery of meaningful development in the town, with 2 no. sites current under construction, at Bridgegate (by The Ardee Partnership) and Castleguard. Castleguard Manor is a social housing development by Tuath Housing and may therefore not contribute to meeting the needs of the projected population of Ardee.
- 5.10 Following the completion of these 2 no. sites, there is a notable deficit in the development pipeline, with no significant planning permissions currently granted at other residentially zoned lands within Ardee. In this respect, the Planning Authority's inclusion of the subject lands as 'A2 – New Residential' is considered appropriate and consistent with the sustainable growth of the settlement as a Self-Sustaining Growth Town.
- 5.11 This will prioritise appropriate future development on a serviced site under single ownership which is in proximity to educational and community facilities and public transport links which will ensure the implementation of draft CDP objectives, deliver community infrastructure and facilitate connections to adjoining lands.

6. Summary & Conclusion

- 6.1 It is reiterated that The Ardee Partnership is committed to further appropriate and high quality residential development in County Louth which will contribute to the sustainable growth of the area in accordance with national and regional policy.
- 6.2 Our client is supportive of the content of the draft Louth County Development Plan 2021-2027 and respectfully requests that the 'A2 – New Residential' zoning objective on the subject lands is carried forward to the adopted version of the Plan in 2021. This will ensure the implementation of vital elements of community and transport infrastructure and public open space in accordance with policy objectives of the draft CDP, subject to a grant of planning permission on the lands in future.
- 6.3 The Ardee Partnership is currently on site at Bridgegate, Ardee, implementing a residential development with a c. 3.72ha public park, crèche and community building in accordance with the Ardee Local Area Plan. This illustrates a willingness of The Ardee Partnership to secure planning permission for, and deliver, vital elements of infrastructure and servicing which contribute to the sustainable growth of Ardee. Our client is committed to the developing the balance of 'A2 New Residential' zoned land

at Bridgegate as set out in the draft CDP in the Plan period to 2027, subject to planning permission.

- 6.4 It is respectfully submitted that the draft Core Strategy and Housing Strategy as it relates to Ardee, is appropriate in the context of the town's location in respect of the existing national road network and the planned upgrades of the N2 and N52 which will enhance the capacity of the town to accommodate future development. This is in line with the settlement's Self-Sustaining Growth Town status as designated in the draft CDP.
- 6.5 It is important for Louth County Council to identify and facilitate appropriate levels of residential growth in the town in accordance with population projections set out in the NPF and to support the town's strong jobs to workforce ratio. The inclusion of the lands at Bridgegate into the 'A2 – New Residential' zoning objective will assist in achieving the objectives of the draft Louth County Development Plan 2021-2027.

Yours faithfully,

John Spain Associates