

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,

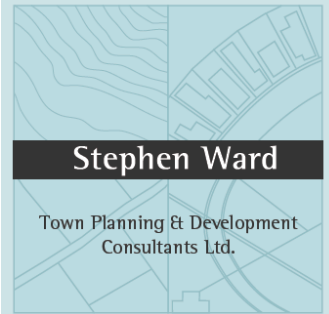
**SUBMISSION RE: DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 – LANDS AT
BOTHAN MAOL/CONNOLLY'S CORNER, BLACKROCK, CO.LOUTH**

Mr. J. McKenna 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 Mr. J.Mc Kenna are attached.

Stephen Ward



Stephen Ward

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1.0 SITE LOCATION AND CONTEXT

The submission lands are located to the north of Blackrock village centre and extend to approximately 1.5ha in total.

The submission lands are partially brownfield and are currently occupied by agricultural sheds and a stone barn. The stone barn is the subject of a grant of planning permission (P.A. Ref. 17-296) for conversion and extension for use as a dwelling house granted on the 4th of December 2017. Construction commenced on site in June 2019. The submission lands are accessed via an existing access road as indicated by the yellow arrow in figure 1 below.

Lands immediately abutting the site to the west are the subject of an SHD permission for 483 no. residential dwellings and a crèche (ABP Ref. No. 304782).

A direct and continuous footpath link is available from the submission lands to Blackrock Village and to large-scale employment areas to the west and north including, Finnabair Business Park and to DKIT.

These lands are currently zoned 'Residential 2' in the Dundalk and Environs Development Plan 2009-2015.



Plate 1 - Approximate boundary of Submission Lands Outlined in Red

Directly, mirroring national policy objectives , specifically NPO 3(c) of the National Planning Frameworks which strongly promote ‘densification’ and ‘consolidation’, Objective CS2 of the Draft Development Plan seeks –

“To achieve compact growth through the delivery of at least 30% of all new homes in urban areas within the existing built-up footprint of settlements, by developing infill, brownfield and generations site and redeveloping underutilised land in preference to greenfield sites” –

This submission seeks the reinstatement of residential zoning on the subject lands having regard to its predominantly brownfield characteristics ; its location and accessibility; its proximity to one of the Town’s major employment areas; proximity to DKIT; and the pattern of existing and permitted development in the immediate vicinity of the site.

2.0 IMPACT OF NATURA 2000 NETWORK ON DEVELOPMENT LANDS

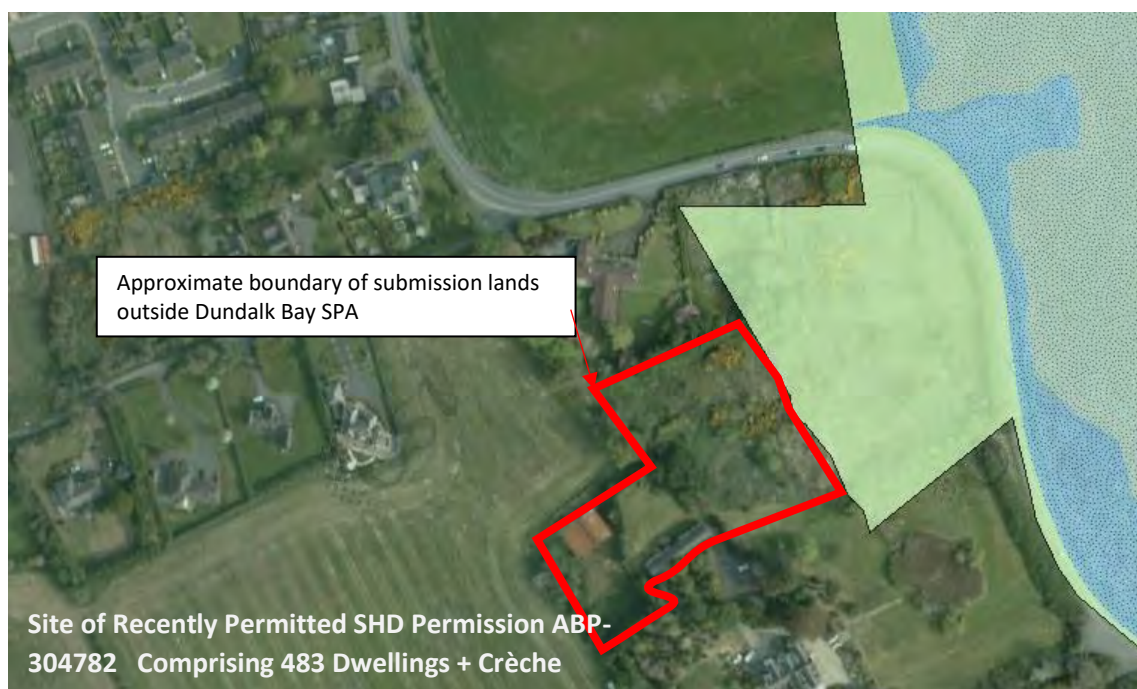


Plate 2 – Map Source: EPA online – Extent of SPA shown in green. Balance of submission lands outlined in red.

Our client acknowledges the proximity of the submission lands to the Natura 2000 Network, in particular the Dundalk Bay SPA and Dundalk Bay SAC which is also a proposed Natural Heritage Area. It is also acknowledged that part of the submission lands are affected by Flood Zone A. For these reasons, it is respectfully suggested that the lands outside the boundary of the Dundalk Bay and Flood Zone A be zoned for residential development. This area as outlined in red on figure 2 above extends to approximately 0.8ha and would contribute to the consolidation of the existing residential area.

3.0 PROPOSED ZONING IN THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

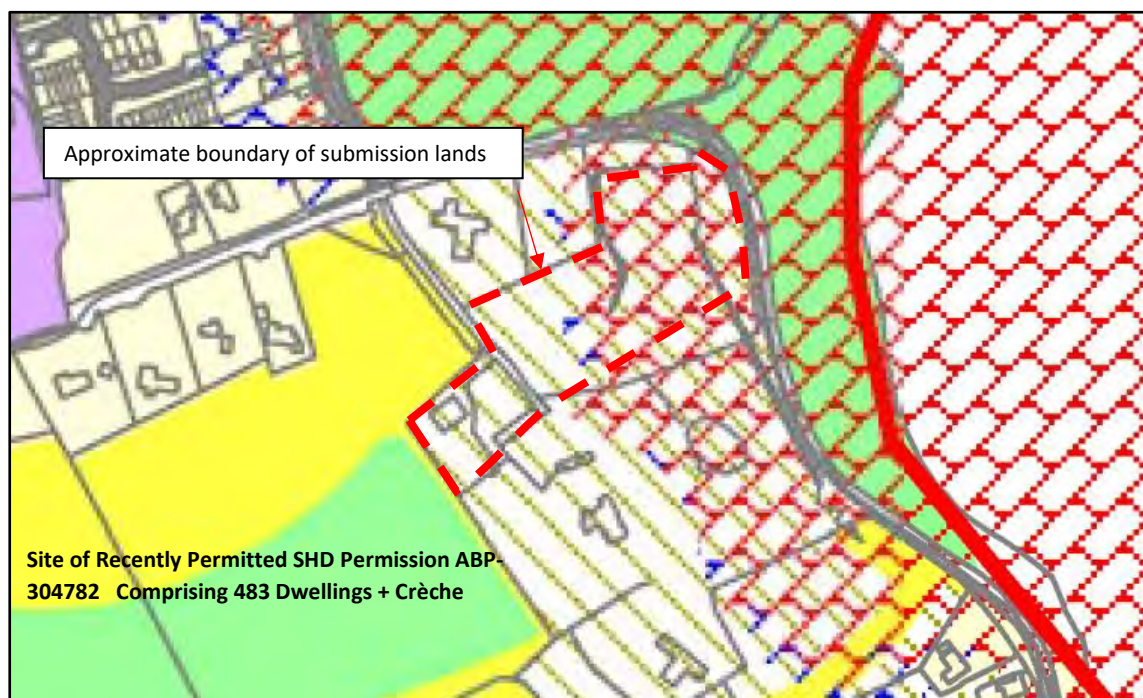


Figure 1 - Extract from the Draft Louth County Development Plan 2021-2027 – Map 1.2 Dundalk Draft Zoning and Flood Zones Map

The submission lands are zoned ‘L1 – Strategic Reserve’ by the Draft Louth County Development Plan. It is submitted that this is an inappropriate zoning objective for an infill site surrounded by residential development and with planning permission to convert and extend an existing stone barn for residential purposes (P.A. Ref. 17-269).

Moreover, lands to the west, north and south west are zoned ‘A2-New Residential’ and ‘H1 – Open Space’ in recognition of a permitted Strategic Housing Development ABP-304782. Plate 1 highlights the proximity of permitted residential development to the submission lands.

The submission lands were assessed as part of ‘Site 16’ in the Infrastructure Assessment and Land Use Evaluation contained at Appendix 2 of the Draft Plan. The ‘site’ as a whole qualified as a Tier 2 site, however, only the site of the SHD was zoned ‘A2-Residential’. It is submitted that should the subject lands been evaluated on their own merits, they would score more highly in terms of ‘Infill/Backland’ and ‘Consolidation/Compact Growth’ than shown on page 12 of the Land Use Evaluation for Dundalk and are can be justified for release within the Plan period.

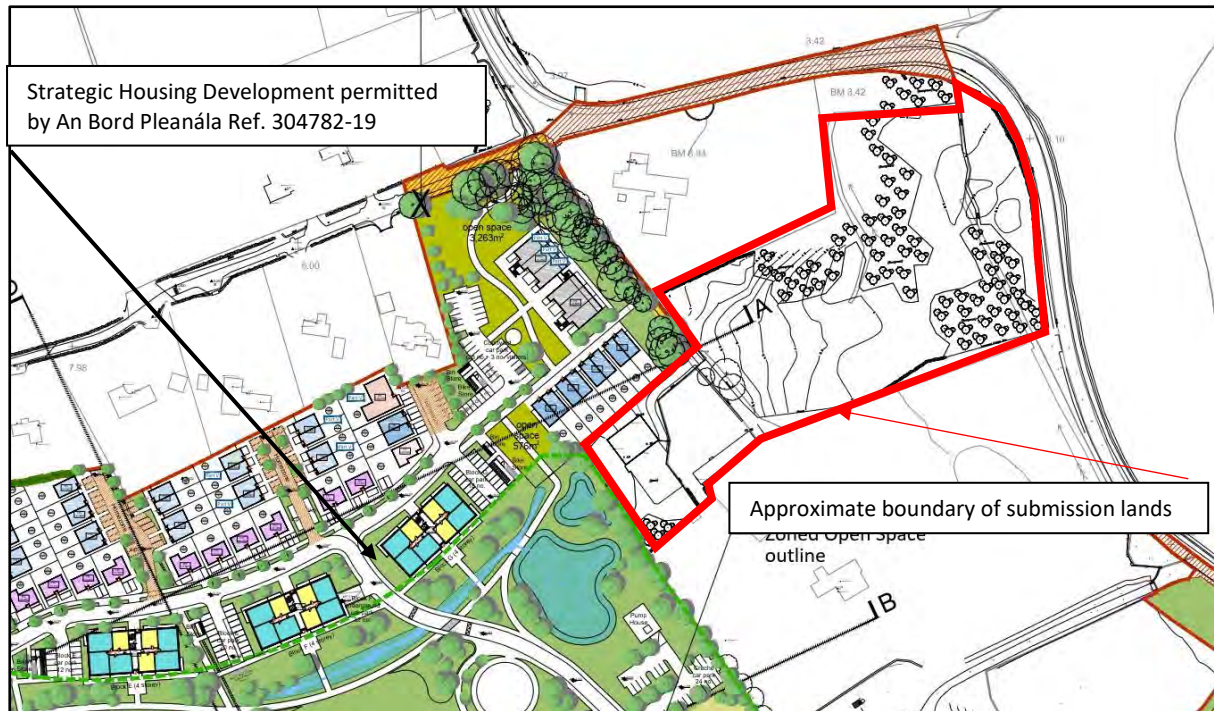


Figure 2- Extract from Architect Drawing Number 1806-OMP-00-ZZ-DR-A-XX-10003 by O'Mahony Pike Architects as submitted with ABP-304782-19

4.0 CONCLUSION

This submission seeks the residential zoning of lands outside Flood Zone A and Dundalk Bay SPA in recognition of the pattern of existing and permitted development in the area; proximity to major employment areas and DKIT and in order to provide for infill/backland development to consolidate the existing residential area.

In conclusion, it is submitted that to exclude an accessible, partially brownfield site that is accessible and proximate to established and very significant employment and education infrastructure does not make efficient use of lands and as such would be entirely inconsistent with current planning policy at all levels which prioritises densification and consolidation.

Yours faithfully,

Stephen Ward