



22nd December 2020

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

Louth County Council

23 DEC 2020

Customer Services
Dundalk

Dear Sir or Madam

DEVELOPMENT PLAN REVIEW.

EHP Services has been appointed by Mr Sean Marmion to make the following submission in respect of the draft Louth County Development Plan 2021-2027 and the zoning of Dundalk as illustrated on Maps 1.1 and 1.2.

Please find enclosed a separate sheet of contact information in compliance with data protection legislation.

The Submitter owns land approximately 14 acres in area off Toberona Road, Dundalk identified in Map 1 overleaf. The Submitter requests the identified subject site retain its residential zoning and that the draft zoning maps for Dundalk (i.e. Maps 1.1. and 1.2) be changed from L1 Strategic Reserve to A2 - New Residential in the draft County Plan.

The general pattern and grain of development along the Toberona Road is predominately linear on the north-western side of the road and more infill/backland development on the south-eastern side. A series of detached and semi-detached bungalows within narrow and very long curtilages line the north-western side of the Toberona Road. With the exception of two bungalows and a long vacant shop unit, the more recent development on the opposite side of the road is set back from the carriageway including the An Slí Residential Home, the Council developed Oldbridge housing estate.

Environmental **H**eritage **P**lanning

The subject site is currently zoned in the Dundalk & Environs Development Plan 2009-2015 as Residential 2 (RES 2) (see Map 2) where the principle planning objective is to provide for new residential communities and supporting community facilities subject to the availability of services. The draft zoning maps for Dundalk accompanying the new County Plan proposes rezoning the subject site to Strategic Reserve as highlighted in Map 3 overleaf.

The proposed rezoning has the detrimental effect of diminishes the subject site's financial value and development potential. It also severely disadvantages the Submitter's aspiration to see the site suitably developed in the following years. It is appreciated that draft Policy Objective CS 10 seeks to prioritise the preparation of an Urban Area Plan (UAP) for Dundalk and accompanying Core Strategy to supersede existing development and local area plans and it will be that plan which deals in more detail with the strategic vision of growth for Dundalk through the application of appropriate zoning objectives and planning policies.

It would be vitally important to the future development of the subject site that the draft zoning maps for Dundalk are revised to allow for its development under the future UAP policies and objectives.

The current Louth County Development Plan 2015-2021 identifies Dundalk as a Level 1 town in the County's settlement hierarchy. Citing the older Regional Planning Guidelines for the Border Region 2010-2022 the County Plan's preferred development strategy is based on building strong urban centres and developing a critical mass in the growth of large towns such as Dundalk which was reflected in Policy SS 2 which states:

SS 2 To facilitate the development of Dundalk and Drogheda and to maintain their positions at the top of the settlement hierarchy.

Development of the subject site would provide an important counter-balance to the sprawl-led development that has evolved within the southern environs and the massive Marlmount and Earlsfort housing estates currently under construction and the Strategic Housing Development schemes recently approved in Blackrock. The potential development of the subject site would be compliant with the strategic provisions within the National Planning Framework (NPF) which prioritises a *focused approach to compact, sequential and sustainable development of the larger urban areas along the Dublin-Belfast economic and transport corridor*. The NPF subsequently set a number of national policy objectives (NPO) aimed at providing an output of '*... at least 25,000 new homes...*' between 2018 and 2040 per year to meet people's needs for '*... well-located and affordable housing, with increasing demand to cater for one and two-person households*' including:

NPO 3a - Deliver at least 40% of all new homes nationally within the built up footprints of existing settlements.

NPO 3c - Deliver at least 30% of all new homes in settlements other than the five Cities (Dublin, Cork, Limerick, Galway and Waterford) and their suburbs, within their existing built-up footprints.

NPO 28 - Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

NPO 33 - Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

The Regional Spatial & Economic Strategy (RSES) 2019-2031 recognises Dundalk as a Regional Growth Centre and one of the principal settlements which, as a regional driver, is critical to the success of both the RSES and NPF. It describes Dundalk as '*...an established centre of agglomeration strategically located on the Dublin-Belfast rail corridor and M1 Motorway and in proximity to both the metropolitan centres of Dublin and Belfast*'.

The vision provided within the RSES is that Dundalk should achieve a target population in the region of 50,000 by 2031. The RSES acknowledges that there is a need for accelerated delivery of housing in identified growth settlements and to ensure that development of high quality and affordable housing. To that end Regional Planning Objective RPO 9.3 states:

RPO 9.3 - Support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring the new models of low cost rental and affordable homeownership.

It is submitted that the proposed change in zoning from L1 Strategic Reserve to A2 - New Residential will allow for the refocusing of some of Dundalk's future development potential northwards; or in this case north-westwards; thereby redressing the unbalanced and unsustainable pattern urban sprawl that has emerged to the south in recent years due to that areas proximity to the Junction 16 of the M1 Motorway. The subject site has just as proximity and ease of access to Junction 17 of the motorway and the Dublin-Belfast Economic Corridor.

The subject site has the benefits of excellent vehicular access to the town's road network, proximity to all necessary infrastructural connections (water, sewerage, power, telecommunications etc.), social infrastructure (Scoil Náisiúnta Eoin Baiste, the St. Louis Secondary School, St. Joseph's Church, Dundalk Rugby Club, Dun Dealgan Nursing Home and An Slí Residential Home) all easily accessible via public transport (Bus Éireann Route 174A) and within a short walking and/or cycling distance to the Castletown Road shops and Dundalk town centre.

Facilitating the upcoming UAP and Core Strategy with an appropriate rebalance of zoned lands towards the 'north' of the town centre will facilitate the consolidated growth model that is a central and universal objective of each tier of national, regional and local strategic planning frameworks including draft Policy Objective CS 6 which states:

CS 6 Direct and consolidate the majority of the County's future population growth into the strong and dynamic Regional Growth Centres of Drogheda and Dundalk in line with the objectives of the Regional Spatial and Economic Strategy and in accordance with the Core and Settlement Strategies of the Development Plan.

We envisage the subject site accommodating a small but high quality enclave of dwellings potentially developed in partnership with an Approved Housing Body or Louth County Council as affordable and/or Part V housing.

The provision of additional housing within the subject site would reinforce the new neighbourhood and prevailing pattern of development along Toberona Road following the introduction of the Oldbridge estate opposite.

In this regard we hope the County Council is favourably disposed to our submission and will make the necessary alterations to Maps 1.1 and 1.2 as requested.

If the Forward Plans Team has any queries regarding the above submission please do not hesitate to contact us.

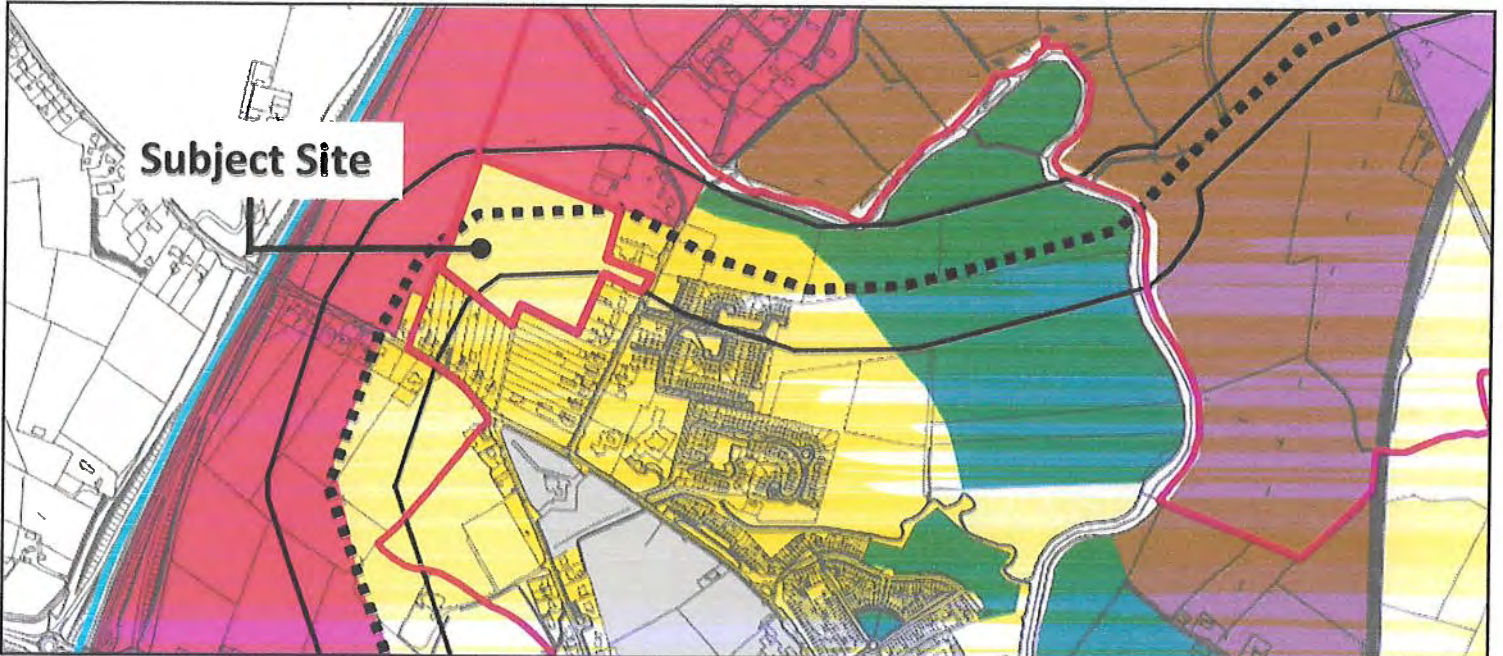
Regards

EHP Services



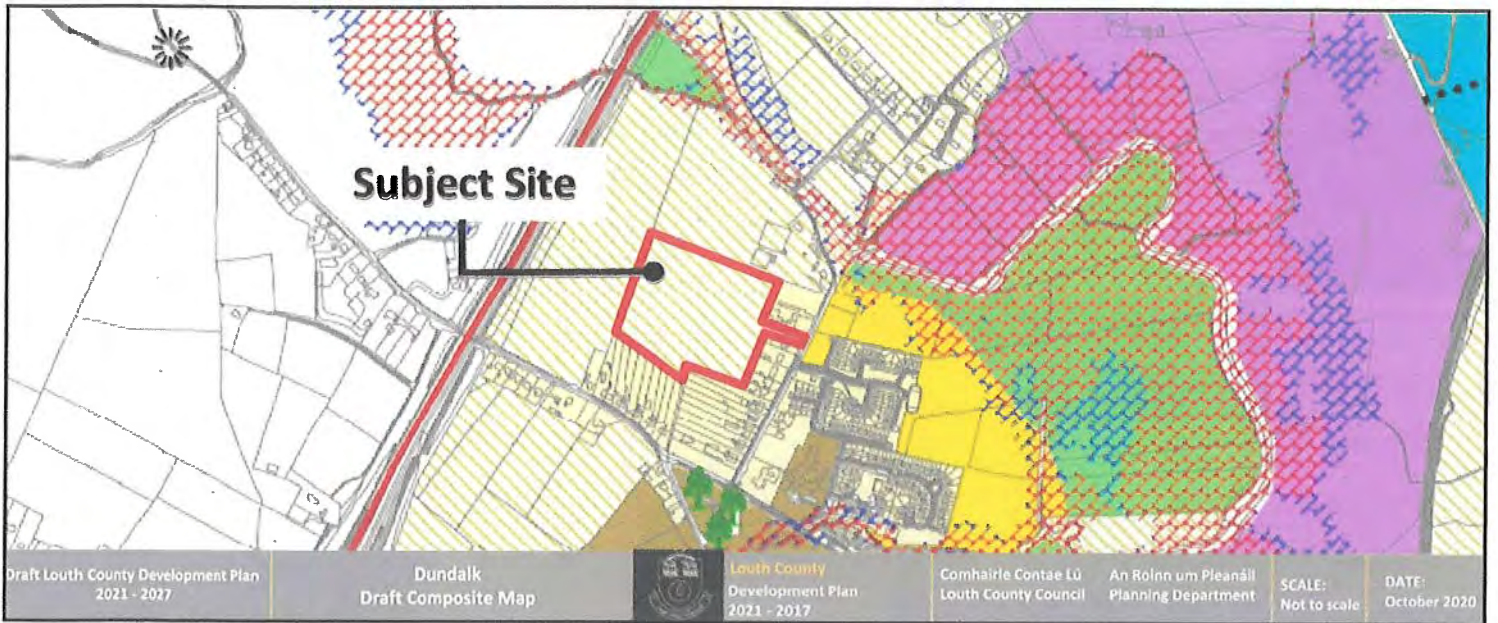
Map 1 - Site Location Map

Source: Google Maps 2020



Map 2 - Existing Dundalk Zoning Map

Source: Dundalk & Environs Development Plan 2009-2015



Map 3 – Proposed Dundalk Zoning Map

Source: draft Louth County Development Plan 2021-2027