

December 2020

Development Plan Submission



Draft Louth County Development Plan 2021-2027 (Stage 2)

Lands at Redcow,
Dundalk, Co. Louth

On behalf of: Merit Holdings



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Executive Summary

- This submission is made by Downey Planning, on behalf of our client, Merit Holdings, and is submitted to Louth County Council in the context of the Draft Louth County Development Plan 2021-2027, which is currently on public display.
- Our client owns approximately 3 hectares of lands at Redcow, Dundalk, Co. Louth. The site is located just north of Dundalk Racecourse and on the eastern side of the N52.
- Under the current Dundalk & Environs Development Plan 2009-2015, which pertains to the area, the lands are zoned 'Tourism and Leisure. Under the Draft Development Plan that is currently on display, the lands are similarly proposed to be zoned 'I1 – Tourism and Leisure'.
- In principle, our client is supportive of the land use zoning that pertains to their lands and respectfully request that this be maintained within the adopted Plan, which is due to come into effect in 2021.

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1.0 Introduction

In accordance with Sections 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended), Downey Planning, Chartered Town Planners, 1 Westland Square, Pearse Street, Dublin 2, on behalf of our client, Merit Holdings, wish to make this submission to Louth County Council regarding the Draft Louth County Development Plan 2021-2027.

This written submission is made in response to an invitation for comments from interested parties by Louth County Council. This submission is being made within the specified timeframe for submissions i.e., 23rd December 2020, as set out on the Draft Development Plan's website.

Our client owns approximately 3 hectares of lands at Redcow, Dundalk, Co. Louth. The site is located just north of Dundalk Racecourse and on the eastern side of the N52. Under the current Dundalk & Environs Development Plan 2009-2015, which pertains to the area, the lands are zoned 'Tourism and Leisure. Under the Draft Development Plan that is currently on display, the lands are similarly proposed to be zoned 'I1 – Tourism and Leisure'.

Our client is largely supportive of the zoning that will pertain to their lands at Redcow and request that these zonings be maintained and included within the final Development Plan that is to be adopted by Louth County Council.

2.0 Planning Legislation

Section 9 of the Planning and Development Act, 2000 (as amended) provides that, subject to the requirements set out in Section 9, 10, 11 and 12 of the Act, that a planning authority must adopt a new Development Plan every six years. The contents of the Development Plan are set out within Section 10 of the Planning and Development Act, 2000 (as amended) and must include a strategy for the proper planning and sustainable development of the area of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question. The process for the preparation of the Draft Development Plan is contained within Section 11 of the Planning and Development Act, 2000 (as amended) and the consultation process of the Draft Development Plan is contained within section 12 of the Planning and Development Act, 2000 (as amended), which states:

"12 - (1) Where the Draft Development Plan has been prepared in accordance with section 11, the planning authority shall within 2 weeks of the period referred to in section 11(5)(c)—

- (a) send notice and a copy of the Draft Development Plan to the Minister, the Board, the relevant regional authority, the prescribed authorities, any town commissioners in the area and any city or county development boards in the area, and*
- (b) publish notice of the preparation of the draft in one or more newspapers circulating in its area.*

(2) A notice under subsection (1) shall state that—

- (a) a copy of the draft may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly), and*

(b) written submissions or observations with respect to the draft made to the planning authority within the stated period will be taken into consideration before the making of the plan”.

This submission to the draft of the Development Plan is being made in accordance with Section 12(2)(b) of the Planning and Development Act, 2000 (as amended) and is being submitted within the specified timeframe (23rd December 2020) as set out on the website of the Draft Louth County Development Plan 2021-2027.

3.0 Site Location and Description

The subject lands are located on the northern side of Dundalk and east of the N52. They are situated approximately 3 km north of Dundalk’s town centre, c. 700 metres south of Junction 18 of the M1 (with a direct motorway access available). Dundalk Racecourse is located just south east of the lands. The lands are strategically located at the northern entrance to Dundalk with direct access to the M1 motorway providing easy access to the entire North East region and the Dublin-Belfast Corridor.

The lands are currently in agricultural use and comprise grassland and field hedgerows marking the boundaries of the land. There is currently an agricultural access from the N52 road.



Fig. 1 – Aerial view of lands subject to this submission (outlined in red)



Fig. 2 – Extract of Site Location Map indicating subject lands outlined in red

4.0 Planning History

Downey Planning have carried out a detailed examination of the planning history of the subject site and surrounding area. There is no planning history pertaining to the lands themselves although there is history on surrounding lands, which shall be summarised below:

- **Reg. Ref. 10/102; ABP Ref. PL15.238860** – By Order dated 22nd August 2012, An Bord Pleanála overturned the decision of the Planning Authority and refused permission to ILS Ltd for a development comprising phase 1 of an integrated sports, leisure and recreation facility on a 13-hectare site that lies just south of the Merit Holdings lands.

- **Reg. Ref. 20/986** – Ready Mix Concrete (Irl) Ltd have lodged a planning application for permission for an amendment of the existing ground levels within their lands at Redcow to facilitate future development of the lands in accordance with the zoning objectives for the lands. A decision on this application is due in January 2021. This site lies to the north west of the Merit Holdings lands.
- **Reg. Ref. 18/556** – By Order dated 24th September 2018, the Planning Authority granted planning permission to Arthur McParland for a development consisting of the dumping and spreading of soil and stone waste for the benefit of agricultural activity, upgrading existing entrance and associated works. This permission has been implemented.
- **Reg. Ref. 17/786; ABP Ref. 301271-18** – By Order dated 6th December 2018, An Bord Pleanála overturned the decision of the Planning Authority and refused planning permission to Handlova Ltd (T/A Cooley Spring Water) for the demolition of a non-habitable derelict cottage and outbuildings and the construction of an indoor multi-activity adventure sports complete (c. 5100 sq.m. GFA) with associated car parking, landscaping and site works on lands at Redcow. This site lies to the north west of the Merit Holdings lands.
- **Reg. Ref. 15/520; ABP Ref. PL15.246173** – By Order dated 23rd June 2016, An Bord Pleanála overturned the decision of the Planning Authority and refused outline permission to Handlova Ltd (T/A Cooley Spring Water) for the demolition of a non-habitable derelict cottage and outbuildings and the construction of a single-storey leisure centre building (4,500 s.qm. GFA) on lands at Redcow. This site lies to the north west of the Merit Holdings lands.

5.0 Planning Context

Having set out the location and history of the subject lands, this submission shall now set out the planning context of the subject lands.

5.1 National Planning Context

5.1.1 Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is *“the Governments high-level strategic plan for shaping the future growth and development of our country out to the year 2040”*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the NPF that, *“a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages.”*

The NPF also seeks to make stronger regions and help to create ‘centres of scale’ to support employment, economic activity and growth. In this regard, National Policy Objective 2B states that *“The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda- Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy”*.

National Policy Objective 7 seeks to apply a tailored approach to urban development with a particular emphasis on *“Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor; Encouraging population growth in strong employment and service centres of all”*.

It is submitted that the development of tourism and leisure facilities on appropriately zoned lands at the edge of Dundalk town, that has direct motorway access can have synergistic benefits with the existing racecourse and be consistent with the aims of the NPF.

5.2 Regional Planning Context

5.2.1 Eastern and Midlands Regional Spatial and Economic Strategy (2019)

The RSES seeks to implement the policies and objectives of the NPF at a regional level. It recognises that the continued growth of Dublin is required as the country’s national economic engine. However, it seeks to generate regional growth and specifically targets the growth of the Regional Growth Centres, which includes Dundalk as regional drivers. In this regard, Regional Policy Objective 3.1 states:

“Key stakeholders including local authorities in the Region shall, through their policies and objectives including development plans, commit to the delivery of the Growth Strategy as detailed in the RSES”.

As stated, Dundalk is identified as a Regional Growth Centre, which are defined as large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.

Table 3.2 of the RSES sets out the preferred growth scenario for the Region, which are outlined below.

Type	Alternatives assessed	Preferred scenario
1. Spatial Strategy	The NPF identified regional concentration and consolidated urban growth as the most sustainable approach to growth patterns in the regions. The SEA for the EMR assessed a number of alternatives based on the extent to which growth is either concentrated in Dublin and the identified Regional Growth Centres or highly dispersed throughout a number of towns in the Region. The optimum settlement strategy was informed by consideration of an evidence baseline identifying the key assets, potential for growth and environmental capacity of settlements.	The optimum spatial strategy combines the growth of Dublin and regional centres with a selected number of large self-sustaining settlements that have the assets and capacity to grow in a sustainable manner while minimising impacts on the receiving environment. This option offers the best opportunity to align services with population and economic growth, promote compact growth in urban settlements and make the best use of infrastructure including public transport thereby reducing transport emissions and improve regional accessibility.
2. Climate and Biodiversity	A number of scenarios at different scales were considered to drive transition to low carbon/ climate resilience and to protect and enhance biodiversity from; inclusion of existing national strategic policies; to developing a regional green infrastructure and ecosystem services approach and; inclusion of site level alternatives for adaptation/mitigation, informed by strategic flood risk and Natura Impact appraisal.	Current trends indicate that implementation of existing national policies alone will not be sufficient to meet climate targets therefore additional measures are required. The preferred scenario combines this with complementary approaches including the development of a regional Green Infrastructure and ecosystem services approach together with site-based alternatives for adaptation/mitigation of impacts in strategic development locations.
3. Economic Strategy	A number of economic growth scenarios were considered and these were dictated by different policy approaches to enterprise development, which ranged from focussed spatial and/or sectoral specialisation to a wider distribution and dispersal of investment and across the Region/ sectors. Assessment was informed by consideration of identified strategic economic assets and by national policy including Enterprise 2025.	The preferred Economic Strategy promotes smart specialisation strategies based on identified strengths and competitive advantages, combined with cluster policies that promote economies of scale and network effects in certain locations. The Strategy should also support diversification of local economies and development of innovation and entrepreneurial ecosystems for sustained national growth that can withstand external shocks.

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies.

In terms of Dundalk, the RSES envisages a population target of 50,000 for the entire settlement of Dundalk up to 2031. The preparation and adoption of a statutory Urban Area Plan (UAP) by Louth County Council is to be a priority.

The following Regional Policy Objectives relate to Dundalk:

- *RPO 4.19: A statutory Urban Area Plan (UAP) shall be prepared by Louth County Council for the Regional Growth Centre of Dundalk in collaboration with the EMRA. The UAP will support the development of Dundalk as an attractive, vibrant and highly accessible Regional Centre and economic driver. The UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.*
- *RPO 4.20: Promote and enhance cross-border interactions to realise the growth potential of Drogheda-Dundalk-Newry as an important crossborder network for regional development.*
- *RPO 4.21: Enhance Dundalk's role as a strategic employment centre on the Dublin-Belfast Economic Corridor and provide for employment opportunities through identification of suitable sites for new industry including FDI.*
- *RPO 4.22: Support the role of Dundalk Institute of Technology as a centre of excellence for education.*

- *RPO 4.23: Enhance potential for economic development and regeneration at Dundalk Port/ Harbour area subject to a feasibility study and appropriate coastal zone management.*
- *RPO 4.24: Support social inclusion measures including the revitalisation of areas by physical regeneration, planning, investment and community development and measures to improve educational attainment levels, up skilling in key competencies and skills acquisition.*
- *RPO 4.25: Support the proposed Dundalk Flood Relief Scheme, subject to the outcome of appropriate environmental assessment and the planning process.*

It is submitted that the development of these lands for tourism and leisure use, in accordance with the land use zoning, will be consistent with the RSES and help to generate economic and employment activity for the Regional Growth Town of Dundalk.

5.3 Local Planning Context

5.3.1 Dundalk & Environs Development Plan 2009-2015 (as Extended)

Under the current Dundalk & Environs Development Plan 2009-2015, which pertains to the area, the lands are zoned 'Tourism and Leisure'.

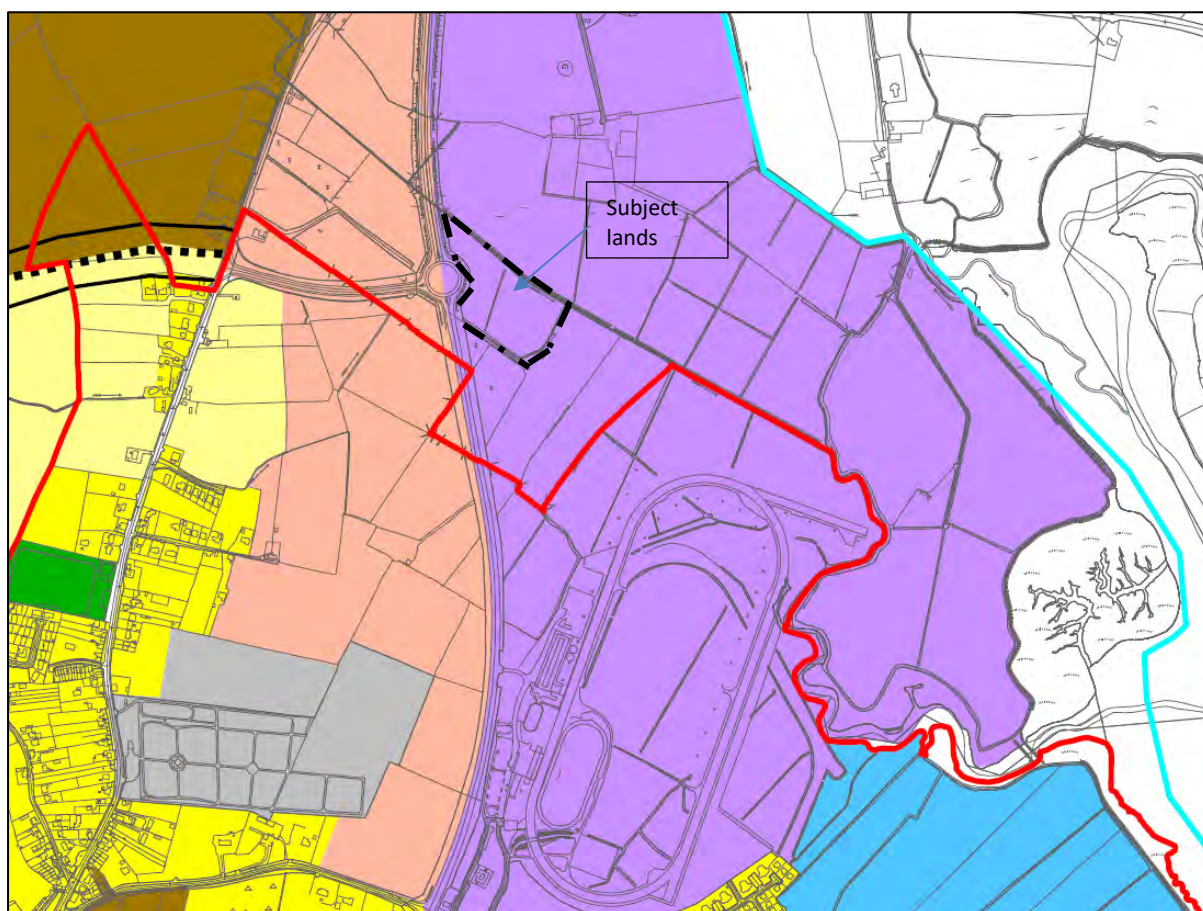


Fig. 3 – Existing Zoning Map from the Dundalk & Environs Development Plan 2009-2015 (site outlined in black)

It is noted that the Dundalk & Environs Development Plan has not been renewed and an Urban Plan for Dundalk is to be incorporated within the overall Louth County Development Plan 2021-2027.

5.3.2 Draft Louth County Development Plan 2021-2027

Under the Draft Development Plan that is currently on display, the lands are similarly proposed to be zoned '11 – Tourism and Leisure'. The Plan indicates that the lands are subject to flood risk given the level of the lands above sea level. The objective for Tourism and Leisure seeks: *“to provide for and enhance tourism and leisure facilities”*. According to the Draft Plan, this zoning provides for the use of land for the provision of tourism and leisure facilities and uses. This includes tourist attractions, cultural facilities, tourist amenities, services, and accommodation. Development that contributes to the enjoyment of recreation or leisure activity will also be considered. Downey Planning would submit that the vision and objective for this zoning is suitable for the subject lands, which benefit from their proximity to Dundalk’s town centre as well as existing amenities and facilities, such as Dundalk racecourse and the Cooley Peninsula.

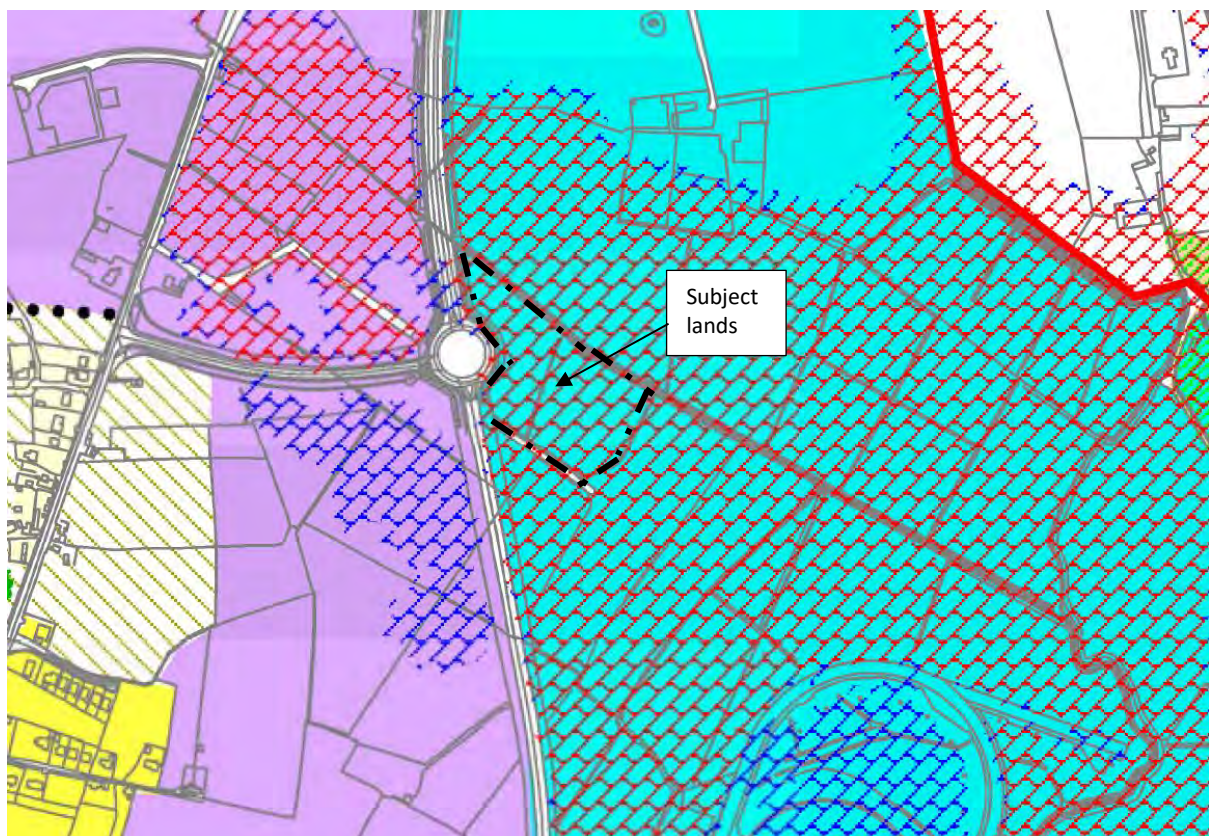


Fig. 4 – Land Use Zoning in the Draft Louth County Development Plan 2021-2027 (subject site outlined in black)

6.0 Justification and Grounds of Submission

As stated, our client is supportive of the zoning that is proposed on these lands at Redcow, Dundalk, under the Draft Louth County Development Plan 2021-2027 and would request that the Tourism and Leisure zoning be adopted into the final Development Plan.

Downey Planning have set out in Section 5 of this report how the proposed zoning of the subject lands is consistent with national, regional and local planning policy and can help to facilitate the growth of

Dundalk as a Regional Growth Centre in terms of attracting new tourism and leisure facilities and help to develop Dundalk to become a tourism destination that builds upon its location within Ireland's Ancient East.

The subject lands are strategically located adjacent to Dundalk racecourse and within easy reach of the town centre as well as the M1 motorway. The development of these lands for tourism and leisure purposes can be supported by improved public transport services that would be detailed as part of future applications on the lands.

It is submitted that although the lands are currently prone to flood risk, this is due to their existing ground levels. However, this can be safely overcome through a careful and sensitive raising of the levels, as has taken place to the west of the lands (Reg. Ref. 18/556 refers). Downey Planning would suggest that the Development Plan should be amended by way of specific local objective such that it supports the raising of the ground level at this location, subject to appropriate environmental and ecological assessments, in order to facilitate tourism and recreation developments.

Furthermore, Downey Planning recommend that the Development Plan be amended in order to provide for appropriate policies that would encourage and facilitate improved public transport and pedestrian connectivity between the lands and the town centre in order to support a modal shift away from private car borne travel.

7.0 Conclusion

This submission has been prepared by Downey Planning on behalf of our client, Merit Holdings, 58 Moneymore Road, Magherafelt, Co L/Derry, BT45 6HG, on the Draft Louth County Development Plan 2021-2027.

Our client owns approximately 3 hectares of lands on the eastern side of the N52 road at Redcow, Dundalk, Co. Louth. Under the current Dundalk & Environs Development Plan 2009-2015, which pertains to the area, the lands are zoned 'Tourism and Leisure. Under the Draft Development Plan that is currently on display, the lands are similarly proposed to be zoned 'I1 – Tourism and Leisure'.

In principle, our client is supportive of the new land use zoning that pertains to their lands and respectfully request that this be maintained within the adopted Plan, which is due to come into effect in 2021 and consider that such zonings are consistent with national and regional planning policy.

As outlined in this submission, we respectfully request that the Development Plan, when adopted, supports the raising of the existing ground levels in this area in order to facilitate developments that are appropriate for this zoning. Furthermore, the Development Plan should provide for appropriate policies that would encourage and facilitate improved public transport and pedestrian connectivity between the lands and the town centre in order to support a modal shift away from private car borne travel.

Downey Planning respectfully request that Louth County Council take into account this submission when adopting the Louth County Development Plan 2021-2027.