



Email Submission in relation to Material Alteration No. DLK22

Louth County Draft Development Plan 2021-2027



PREPARED BY

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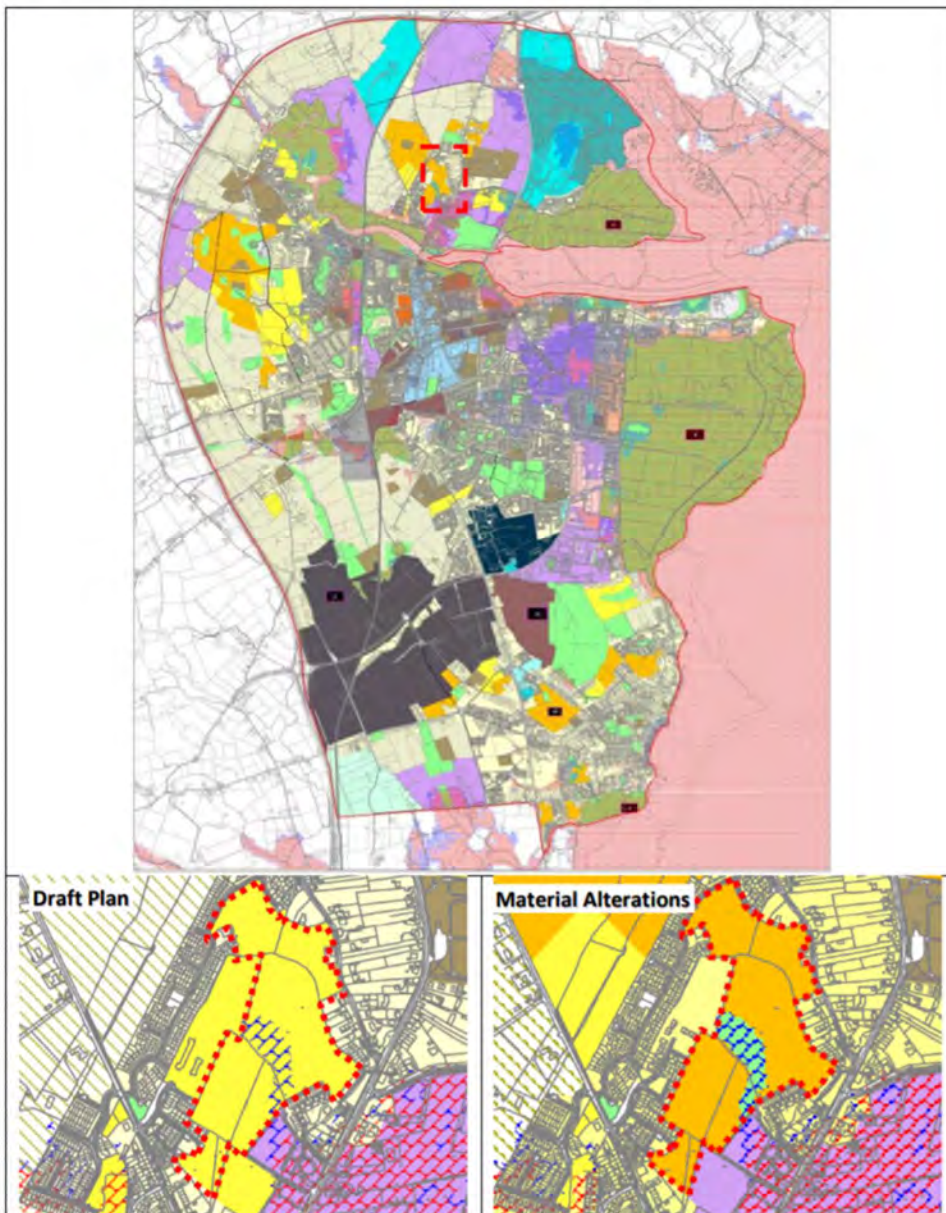
To: Frank Pentony, Director of Services, Louth County Council, Town Hall, Crowe Street, Dundalk, Co. Louth A91 W20C

By Email only to: Louthcdp@louthcoco.ie

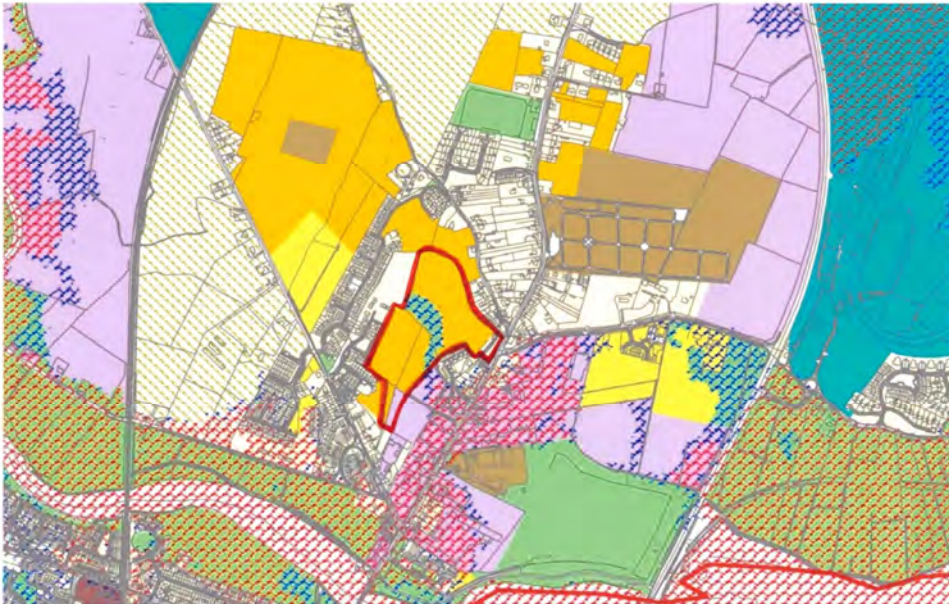
Made on behalf of: See attached sheet

Material Alteration No. DLK22

Change Lands south of the Doylesfort Road and east of the Newry Road from A2 Residential New to A3 New Residential Phase 2.



1. The maps above outline the land which is the subject of Material Alteration No. DLK 22. The maps show the original Draft Plan and the proposed Material Alteration DLK 22. We note that in the original draft plan the lands outlined in the maps above were zoned as A2 Residential Phase 1. This Material Alteration DLK 22 has downgraded the proposed zoning to A3 Residential Phase 2. This means that these lands cannot be developed until the A2 Residential Phase 1 lands are developed and will therefore be underutilised for the foreseeable future.
2. This submission relates only to a part of these lands as shown outlined in red on the map below. The remainder of the lands would remain zoned as per the Material Alteration. The open space shaded green on the map below as per Material Alteration DLK 31 is accepted as a change to H1 open space.



3. The change in zoning appears to be influenced by the Office of the Planning Regulator's interpretation of calculating housing growth that led them to the conclusion that too much A2 Residential Phase 1 zoned land was included in the Draft Plan. This has led to a requirement to reduce the quantum of A2 Residential Phase 1 zoned lands from the Draft Plan. While the change in the zoning of some A2 Residential Phase 1 lands to A3 Residential Phase 2 is a logical response to address the Regulator's concerns it raises the issue of how to prioritise which land should be developed first and thus designated A2 Residential Phase 1.
4. The lands in question are near the town centre on the northern side of the town. The land is serviced and ready to be developed. There is no flooding issue on the zoned part of the site unlike other A2 zoned sites located elsewhere. There are a variety of shops, restaurants, and pubs along the Newry Rd boundary of the site, including an Aldi supermarket. It is likely that access to the site

would be provided from this road which has connectivity to the existing road network. There is a Church nearby, and it is very close walking distance to town centre, with the top of main street just a few hundred metres away. It is therefore well provided for by existing local amenities that benefit a residential development. It provides for a sustainable development that supports existing amenity and infrastructure with facilities within walking and cycling distance of the proposed future residential development.

5. In looking at the growth of the town we would argue that a sequential approach to the development of available lands is a logical and reasonable approach when considering which lands should be developed first. It is clear from the Draft Development Plan map above that there are several sites that are zoned A2 Residential Phase 1 that are far more distant from the town centre and relevant amenities than the site in question.
6. It is a universal sustainability policy to encourage a modal change from car usage to cycling and walking. The distance to the centre of the town and all its amenities is a significant influencing factor in people's behaviour and choice of transport. As noted above the proposed lands are proximate to relevant facilities and amenities within walking and cycling distances.
7. It is in our opinion more appropriate that the sites closest to the centre of the town and existing amenities are zoned A2 Residential Phase 1 as a priority over other land further away from the centre and relevant amenities. The quantum reduction in the A2 residential Phase 1 zoning can be better achieved in the parcels of land that are at a greater distance from the town centre and relevant amenities being changed to the A3 Residential Phase 2 zoning to achieve the required reduction in quantum of A2 Residential Phase 1 zoning.
8. The sequential approach is a logical and fair system that prioritises the utilisation of the scarce land resource that is closest to the town centre served by existing amenities. The land in question is already surrounded by housing development and is not an isolated site. It is located on the Northern side of the town which is the side of the town that would benefit from additional development and has adequate access to amenities and a road network that already exists. It provides a balanced development to the southern side of the town that is continually moving southwards away from the centre.
9. It is our submission that the Draft Plan correctly zoned these lands as A2 Residential Phase 1 which was the zoning considered most appropriate when the technical appraisal of the proposed residential zoning was considered during the preparation of the Development Plan. There does not appear in our opinion to be a logical argument to down grade this zoning. The required reduction in the quantum of A2 Residential Phase 1 zoned land would in our opinion be better served by considering the sites on a sequential test which in our opinion would lead to part of the site retaining the zoning given it in the Draft Development Plan. This submission deliberately does not seek the rezoning of the entire site in recognition of the fact that there needs to be a balanced

approach that allows for a variety of development potential across Dundalk and is based on a reasoned proposition.

We trust this submission will be examined and given a favourable consideration.