



Louth County Council
22 DEC 2020
Customer Services
Dundalk

20th December 2020

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

Dear Sir or Madam

DEVELOPMENT PLAN REVIEW.

EHP Services has been appointed by Mr Niall Clarke to make the following submission in respect of the draft Louth County Development Plan 2021-2027.

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

The Submitter owns lands at Carrickcarnon, Ravensdale, Co. Louth between the old Newry Road (R132) and the Edentober Road (see Map 1 overleaf).

The Submitter is pleased to present the following case for defining and expanding the Carrickcarnon Economic/Business Zone to include his lands and to make appropriate changes to the draft Rural Policy Zone Map 3.2 and associated text in the draft County Plan and policies.

We are encouraged that the draft County Plan recognises the current economic threats and uncertainties faced by the County's economy from the pandemic and Brexit. We note the provisions of Policy Objective EE 1 and the continued encouragement of economic development along the Dublin-Belfast Economic Corridor. Section 5.19.3 of the draft County Plan states the economic/business zone identified at Carrickcarnon will '*... facilitate employment related development, subject to the preparation of a Master Plan. These lands are strategically located along the Dublin-Belfast Economic Corridor and will assist in providing strategic employment to the surrounding rural area. The location of this Economic/Business Zone is identified on Map 3.2.*

The Rural Policy Zone Map 3.2 provides a very small and undistinguished blue dot to identify the Carrickcarnon Economic/Business Zone (CEBZ) but the actual lands involved. In past pre-planning discussions the County Council has stated the principal focus of this designation is the Carrickdale Hotel & Leisure Complex and Centrepoint Business Park to the exclusion of all other surrounding businesses not within the park premises.

The Centrepoint Business Park is a highly successful entity comprising of a number of mid-sized industrial/commercial units, workspaces and service yards and presently accommodates number of businesses including By-Gone Times Antiques & Salvage Co. Furniture Warehouse and Thomastown Trucks. It is however spatially constrained by the old Newry Road (R132) and Newtown Road to the east and west respectively, residential properties to the south and pastoral lands not under their ownership to the north (see Map 2 overleaf).

It is submitted that referencing the CEBZ within context rural enterprise is prohibitively restrictive and a lost opportunity in realising the area's fullest economic potential and greater contributory role to the County and region. The area's proximity to the Northern Ireland/Republic of Ireland border, the excellent surrounding road network and proximity to Junction 20 of the M1 (the first motorway junction passed the border) makes the CEBZ an ideal first-stop location to operate on multiple economic levels and provide additional space and facilities to attract local, national and international employment generating uses. Such attributes represent the strong locational drivers referenced in Policy Objective EE 16 which do not apply to the same extent elsewhere in the County. The general area, including the Submitter's land, is an ideal focus for the draft County Plan's Brexit orientated objectives in particular Policies EE 1, EE 3, EE 12, EE 15, EE 16 and most specifically EE 13.

It is submitted that the CEBZ requires a more definitive map identifying the masterplan area than has been provided for by the blue dot on Map 3.2. The Submitter also respectfully requests that the lands identified in Map 1 overleaf are included from the very earliest stages in the development of the future Masterplan cited in Policy Objective EE 60.

Within context of the above we would also suggest revising Policy EE 60 along the following suggested lines:

EE 60 *To consider, subject to the preparation of a Master Plan, the development of the Economic Business Zone at Carrickcarnon for commercial development including (but not exclusively) an Off line Motorway Services area, truck stop, service, repair and parking area and associated ancillary infrastructure to include motel/hotel, ancillary retail shop and dining facility, light industrial, storage and logistics facilities, retail warehousing (bulky goods only) and motor sales and any other scale of development commensurate with the needs of businesses, enterprises and*

unexpected opportunities responding to the challenges and uncertainties associated with the UK withdrawal from the EU.

The Submitter would defer to whatever amendments to the language of the aforementioned policies or sections of Chapter 5 the Forward Plans Team would deem suitable to accommodate the proposed revisions and achieve cohesion between policy objectives.

The Submitter currently operates a commercial diesel station, fuel storage tanks within a large concreted yard and light industrial buildings approved under a number of separate grants of planning permission. Vehicular access is taken from the Edentober Road entrance. The majority of associated traffic approaches from the south off Junction 20 and along the old Newry Road (R132) as illustrated in Map 2 overleaf.

The existing premises has scope to accommodate additional commercial, light industrial, storage and logistics and warehousing units for local, national or cross border businesses. The greater portion of the subject site is poor quality marshy agricultural land. It has been historically unused resulting in extensive overgrowth and dereliction. This land block can be accessed along the Edentober Road and old Newry Road (R132) and from within the fuel station and adjoining industrial units.


We envisage development within the subject site comprising of a mix of building sizes to suit the exclusive needs of small, medium and large local rural enterprise and varied national and cross border businesses. In addition to the site's proximity to an excellent road network the envisaged development of the subject site does not introduce any use that isn't already occurring to some degree within the surrounding area and which is compatible with the aforementioned economic policies set out in Chapter 5 of the draft County Plan.

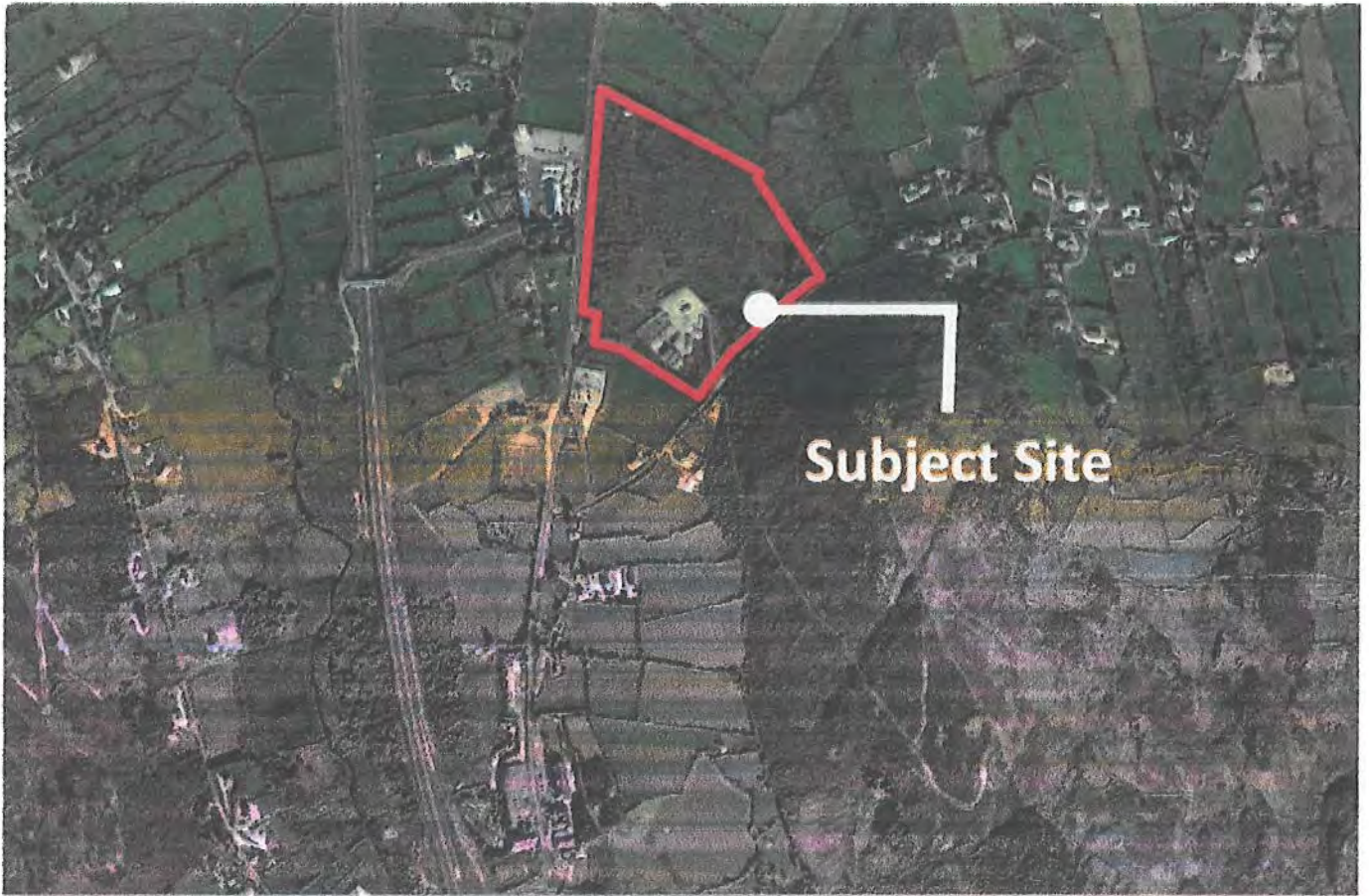
We trust the Forward Plans Team will make the appropriate changes to Rural Policy Zone Map 3.2 and the language throughout Chapter 5 to affirm the inclusion of the subject site within the CEBZ and subsequent masterplan.

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

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

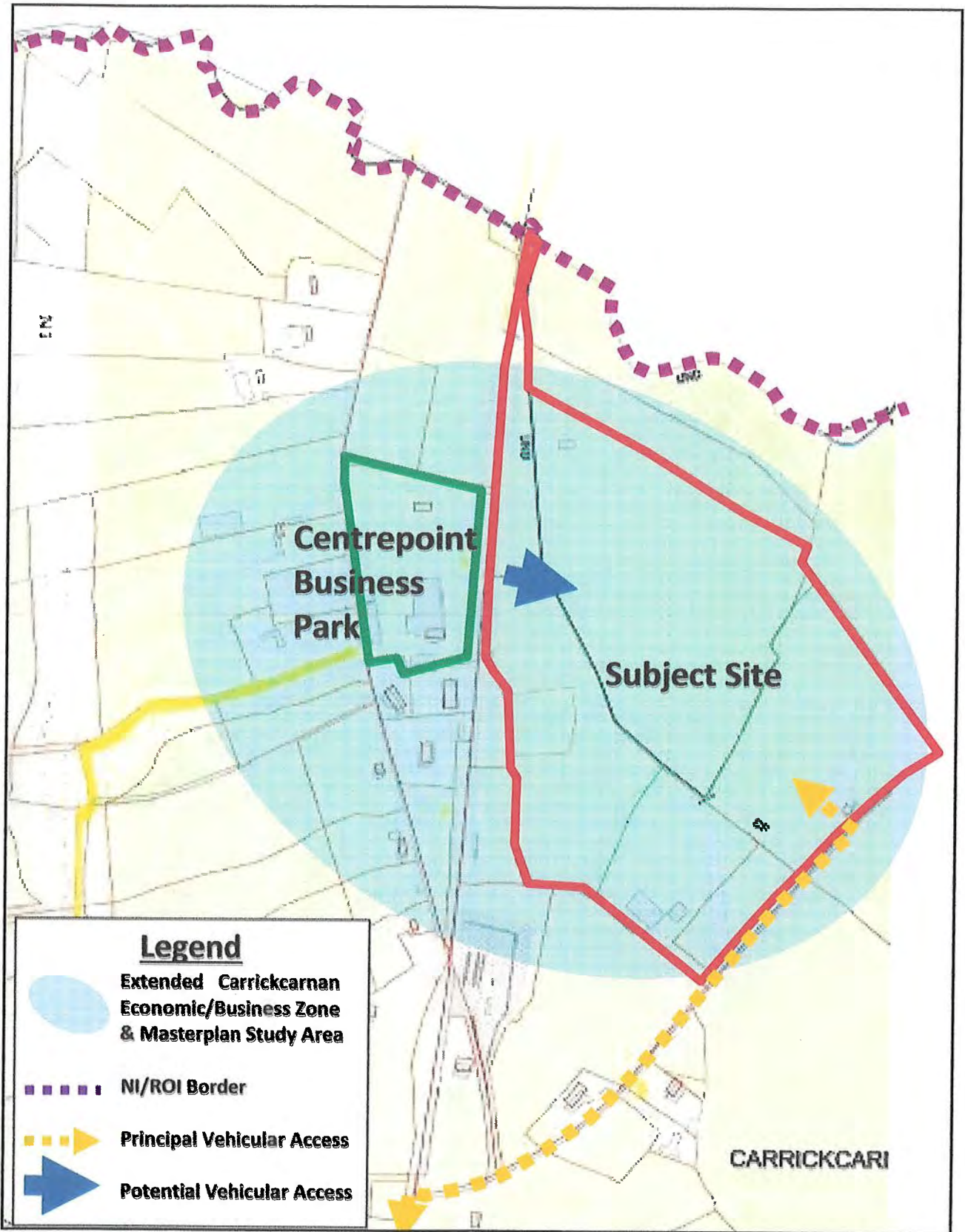
Regards


EHP Services



Map 1 - Site Location Map

Source: www.geohive.ie (2020)



Map 2 – Proposed CEZ Masterplan Study Area