



Comhairle Contae Lú
Louth County Council

Chief Executive's
Report on
Submissions
Received on the
Proposed Material
Alterations

23rd August 2021

Draft Louth
County
Development
Plan

2021-2027



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Section 1

Introduction and Overview

1.0 Introduction

This report relates to submissions and observations received from prescribed bodies and members of the public, following the publication of the proposed Material Alterations to the Draft Louth County Development Plan 2021-2027.

In accordance with Section 12(4)(a) and Section 12(4)(aa) of the Planning and Development Act 2000 (as amended) a Chief Executive's Report on the submissions received to the draft Louth County Development Plan 2021-2027 was prepared and submitted to the elected members on the 24th March 2021 for their consideration. Details were published in two local newspapers and made available to view/download on the Louth County Council website. In accordance with Section 12(4)(b) of the Planning and Development Act 2000 (as amended) the Chief Executive's Report summarised the submissions received on the draft Louth County Development Plan 2021-2027 and provided a detailed response and recommendation(s) to the issues raised.

The Elected Members, having considered the draft Louth County Development Plan 2021-2027 and the Chief Executive's Report on submissions received, resolved, following a series of Special Council meetings, 17 in total, to amend the draft Louth County Development Plan.

These proposed amendments, if made, constitute a material alteration to the Draft Louth County Development Plan 2021-2027. Accordingly, the Council resolved to place the proposed material alterations on public display for a period of not less than 4 weeks, in accordance with Section 12(7)(b) of the Planning and Development Act 2000 (as amended).

1.1 Public Consultation

Notice of the proposed Material Alterations, including additions to the Record of Protected Structures, was published on 29th June 2021, in the Argus and Drogheda Independent newspapers, in accordance with the requirements of Section 12 of the Planning & Development Act 2000 (as amended), which requires that a copy of proposed Material Alteration and any determination by the authority be placed on public display during a stated period of not less than 4 weeks.

The proposed Material Alterations to the Draft Louth County Development Plan 2021-2027 and accompanying Environmental Reports were placed on public display from the 29th June to Wednesday 28th July 2021, inclusive. Details were available to view online at <https://www.louthcoco.ie/en/publications/development-plans/draft-louth-county-development-plan-2021-2027/> and were made available for inspection, by appointment, at the following locations:

Customer Service Counters:

- County Hall, Millennium Centre, Dundalk, A91 KFW6,
- Town Hall, Crowe Street, Dundalk, Co. Louth A91 W20C,
- Drogheda Civic Offices, Fair Street, Drogheda, Co. Louth A92 P440,
- Mid Louth Civic Offices, Fairgreen, Ardee, Co. Louth A92 RTY2.

Public Libraries

- County Library, Dundalk Roden Place Dundalk, A91 RC44. Tel: 042-9353190,
- Drogheda Library, Stockwell Lane, Drogheda, A92 PY20. Tel: 041-9876162,
- Ardee Library, Market Square, Ardee, A92 XH22. Tel: 041-6859023.

Only observations or submissions related to a proposed material alteration made by email or in writing, received between the: 29th June 2021 and by 4:00pm on Wednesday 28th July, 2021 could be considered.

1.2 Submissions/Observations Received

A total of 67 no. submissions were received during the public consultation period, with 64 no. submissions made online at louthcdp@louthcoco.ie and 3 no. submissions received by post/hand. Only submissions made via email or by hardcopy within the timeframe were accepted.

1.3 Environmental Considerations

Pursuant to Section 12(7) (aa) of the Planning & Development Act 2000 (as amended) the Planning Authority made determinations that a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) were required to be carried out with regard to a number of proposed Material Alterations. Pursuant to Section 12(7) (ab); an SEA and AA were undertaken in respect of the proposed Material Alterations. The determinations, SEA and AA Environmental Reports were placed on display along with the proposed Material Alterations.

1.4 Content and Format of Report

This Chief Executive's report forms part of the statutory procedure for the preparation of the Louth County Development Plan 2021-2027 and is structured as follows;

- **Section 1** - consists of an introduction and an overview of the process.
- **Section 2** - details the legislative background to the preparation of the Chief Executive's Report.
- **Section 3** - lists the persons / bodies who made submissions or observations.
- **Section 4** - summarises the issues raised in submissions and observations and sets out the Chief Executive's response in relation to the issues raised,
 - (i) Chief Executive's Summary, Response and Recommendation on Submissions from Prescribed Bodies,
 - (ii) Chief Executive's Summary, Response and Recommendation on Zoning Submissions,
 - (iii) Chief Executive's Summary, Response and Recommendation on RPS Submissions
 - (iv) Chief Executive's Summary, Response and Recommendation on General Submissions.
- **Section 5**- Appendix 1 and 2.

1.5 Interpretation of this Chief Executive's Report

Please note in this document, proposed changes to the text are denoted as follows:

Green – will apply to the insertion of any new text as proposed in this Chief Executive's Report.

Red – will apply where there is additional text to be inserted as per the Material Alterations published on the 29th June 2021.

Blue ~~strikerough~~ – text to be deleted as per the Material Alterations published on the 29th June 2021.

SECTION 2

LEGISLATIVE BACKGROUND

2.0 Chief Executive's Report on Submissions and Observations Received

In accordance with Section 12(8) of the Planning and Development Act 2000 (as amended) the Chief Executive is required to prepare a report on submissions/observations received in relation to the proposed Material Alterations to the draft Development Plan and submit it to the Elected Members for their consideration.

In accordance with the requirements of Section 12(8)(b) of the Planning and Development Act 2000 (as amended), the Chief Executive's Report shall:

- i. list the persons or bodies whom made submission or observations ; during the prescribed public consultation period;
- ii. Summarise the issues raised by the persons or bodies in the submissions or observations received during the prescribed public consultation period;
- iii. Give the response of the Chief Executive to the issues raised, taking account of:
 - directions of the members of the authority regarding the preparation of the draft Development Plan;
 - the proper planning and sustainable development of the area;
 - the statutory obligations of the local authority;
 - any relevant policies or objectives of the Government or of any Minister of the Government.

2.1 Consideration of Amendments, Chief Executive's Report and Making of the Development Plan

In accordance with Section 12(9) of the Planning & Development Act 2000 (as amended), the members of the Planning Authority are required to consider the amendments and the Chief Executive's Report not later than six weeks of receiving the Report. The members of the authority shall, by resolution, having considered the Chief Executive's Report, make the plan with or without proposed Material Alterations, except where they decide to accept the amendments subject to modification, which may include the making of a further modification to the alteration. A further modification to a Material Alteration may be made only where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European Site, and shall not be made where it relates to an increase in the area of land zoned for any purpose or an addition to or deletion from the record of protected structures.

Pursuant to Section 12(17) of the Planning & Development Act 2000 (as amended), a Development Plan made under this section shall have effect six weeks from the day that it is made.

2.2 Relevant Considerations when Making the Development Plan

Pursuant to Section 12(11) of the Planning & Development Act 2000 (as amended), in making the Development Plan, Louth County Council is restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of the local authority and any relevant policies or objectives of the Government or any Minister of the Government.

Within the context of the above, it should be noted that Sections 28(1) of the Planning & Development Act 2000 (as amended), states that a Planning Authority shall consider the policies and objectives of the Minister contained in guidelines issued under Section 28, which may include specific planning requirements, when making a Development Plan.

It is also a requirement to append a statement to the Development Plan in relation to (inter alia) how the Planning Authority has implemented the policies and objectives in such guidelines.

This Chief Executive's Report on submissions or observations received in relation to the proposed Material Alterations to the draft Development Plan is submitted to you, the Elected Members of the Planning Authority for consideration.

Section 3

*List of Persons/Bodies
who made submissions*

No.	Reference	Organisation/ Person Making Submission
1.	LCDP MA001	Geological Survey Ireland
2.	LCDP MA002	Peter Carrol on behalf of Dundalk Stadium Company
3.	LCDP MA003	Stephen Ward Consulting on behalf of Brian Hearty
4.	LCDP MA004	Irish Water
5.	LCDP MA005	Environmental Protection Agency (EPA)
6.	LCDP MA006	Declan Byrne
7.	LCDP MA007	Stephen Ward Consulting on behalf of Shannon Homes Ltd.
8.	LCDP MA008	Stephen Ward Consulting on behalf of Urban Life Ltd.
9.	LCDP MA009	Stephen Ward Consulting on behalf of Frank and Ronan McArdle
10.	LCDP MA010	Stephen Ward Consulting on behalf of McGahon Partnership
11.	LCDP MA011	Sean Conyard
12.	LCDP MA012	Paul Monahan
13.	LCDP MA013	Aontú Louth
14.	LCDP MA014	Office of Public Works (OPW)
15.	LCDP MA015	David Griffiths
16.	LCDP MA016	Seamus Roe & Co. Solicitors, on behalf of Patrick Reilly, Brendan Roe, Seamus Roe and Tara Mullarkey
17.	LCDP MA017	Cyril Carter
18.	LCDP MA018	Jack Traynor
19.	LCDP MA019	David Dennis
20.	LCDP MA020	Doherty Design Services
21.	LCDP MA021	Transport Infrastructure Ireland (TII)
22.	LCDP MA022	Brady Hughes Consulting on behalf of Lorrac Developments Ltd., Thomas Meegan, Rita Meegan, Imelda McGuinness and Clare McGovern
23.	LCDP MA023	Stephen Ward Consulting on behalf of Bellscape Ltd.
24.	LCDP MA024	Stephen Ward Consulting on behalf of Bellscape Ltd.
25.	LCDP MA025	Graham Woods
26.	LCDP MA026	Lisa Browne
27.	LCDP MA027	Ian Craig
28.	LCDP MA028	Joe Rogers
29.	LCDP MA029	John Spain Associates on behalf of Breen Holdings
30.	LCDP MA030	Ronan Farrelly
31.	LCDP MA031	Doherty Design Services on behalf of Forevergreen Construction Ltd.
32.	LCDP MA032	Stephen Ward Consulting on behalf of Doherty Developments Ltd.
33.	LCDP MA033	Aiden Torris
34.	LCDP MA034	Cllr Dolores Minogue
35.	LCDP MA035	Laura Torris

No.	Reference	Organisation/ Person Making Submission
36.	LCDP MA036	Margaret Daisy Mathews
37.	LCDP MA037	Stephen Ward Consulting on behalf of Peter Callaghan
38.	LCDP MA038	Mr. Fred O'Hagan, Lisa O'Hagan Mernagh and Orlaith O'Hagan
39.	LCDP MA039	DAERA - Dept. of Agriculture, Environment and Rural Affairs for Northern Ireland
40.	LCDP MA040	Stephen Ward Consulting on behalf of O'Hare McGovern Ltd.
41.	LCDP MA041	Bernice Mee
42.	LCDP MA042	Stephen Ward Consulting on behalf of Urban Life Ltd.
43.	LCDP MA043	Stephen Ward Consulting on behalf of Urban Life Ltd.
44.	LCDP MA044	Stephen Ward Consulting on behalf of B.N and B Carroll
45.	LCDP MA045	Stephen Ward Consulting on behalf of B.N and B Carroll
46.	LCDP MA046	Vincent E Traynor on behalf of Mr. Freddie Johnston
47.	LCDP MA047	Jim Gartland
48.	LCDP MA048	Cllr. Paddy McQuillan
49.	LCDP MA049	Deirdre McQuillan
50.	LCDP MA050	Jerry O'Connell
51.	LCDP MA051	Fiona Lynch
52.	LCDP MA052	Leonard J Hatrick
53.	LCDP MA053	Stephen Ward Consulting on behalf of Moffett Property Management Ardee Ltd.
54.	LCDP MA054	Meath County Council
55.	LCDP MA055	RWE Renewables Ireland
56.	LCDP MA056	Electricity Supply Board (ESB)
57.	LCDP MA057	Office of Public Regulator (OPR)
58.	LCDP MA058	DAU Dept. of Housing, Local Government and Heritage
59.	LCDP MA059	Brian Hanratty
60.	LCDP MA060	Sylvia McCann
61.	LCDP MA061	Department of Education
62.	LCDP MA062	Ciara MacCormac
63.	LCDP MA063	Wind Energy Ireland
64.	LCDP MA064	Declan Flood
65.	LCDP MA065	Pat McArdle
66.	LCDP MA066	Anna McKenna
67.	LCDP MA067	SERI (Social Enterprise Republic of Ireland)

Section 4

*Summary of Issues Raised,
Chief Executive's
Response
& Recommendation*



Section 4 (i)

Chief Executive's
Summary, Response
and Recommendation
on Submissions from
Prescribed Bodies

Summary of Submission:

The submission from the OPR sets out ten recommendations and two observations under seven key themes as follows:

- **Core Strategy and Housing Supply Targets**
- **Compact Growth, Regeneration and Tiered Approach to Zoning**
- **Rural Housing and Regeneration**
- **Economic Development and Employment**
- **Transport and Accessibility**
- **Climate Action and Renewable Energy**
- **Flood Risk Management**

MA Recommendation 1 – Core Strategy and Housing Supply Targets

The draft Plan as proposed to be materially altered is inconsistent with Recommendation 1 of the Office's submission on the draft Plan. Having regard to the provisions under Section 28 of the Act, the planning authority is required to:

- (i) Review and amend the proposed Core Strategy to insert the total housing supply target for the County and the consequential housing allocations to each settlement consistent with the requirements of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning and Appendix 1 of the accompanying Letter of the Minister;
- (ii) Review and amend the approach to zoning for residential use and for a mixture of residential and other uses, as necessary to implement the amendments made under (i) in accordance with the requirements for compact growth; and
- (iii) Append an updated statement to the Plan in accordance with subsection (1B) taking account of the Guidelines.

Note: In view of the legislative constraints that exist in terms of introducing amendments to the draft Plan at this stage of the process, the Office would welcome discussion with the planning authority.

Chief Executive's Response:**MA Recommendation 1 i) – Core Strategy and Housing Supply Targets**

The timing of the publication of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning, almost 3 years after the publication of the National Planning Framework, has created significant challenges for Local Authorities who are at advanced stages of the Development Plan process. Transposing these figures into the Development Plan at this stage of the process will require a detailed review of the Core Strategy which will require a considerable period of time and resources.

As indicated by the OPR in Recommendation 1, the Council are constrained as to what it can consider at this stage of the process in that any further modifications must be made to a proposed material alteration.

Taking account of the fact that the proposed material alterations placed on public display did not include any amendments to the Core Strategy with regard to the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning it is not considered that any amendments regarding these Guidelines can be introduced at this stage of the Plan.

However the OPR should note that the Council is committed to ensuring the Plan is consistent with the Housing Supply Target Methodology Guidelines and would consider the most appropriate mechanism for ensuring consistency would be by way of a Variation. The Council is willing to commit to preparing this Variation within 6 months of the adoption of this Plan.

Nonetheless as part of the response to this submission it is considered appropriate to review the Core Strategy allocation in the Draft Plan against these Guidelines.

In preparing the Draft Plan the Council utilised the ‘traditional’ approach in projecting the housing requirement, basing the calculation on the projected population, the projected occupancy rates, vacancy, and recent levels of household completions. The Housing Supply Target Guidelines have adopted a new approach, basing the projections on a number of factors including population change, inter-county and international migration and influenced by employment and house prices.

The Council has calculated the projected housing target for the County based on the methodology in the Housing Supply Target Guidelines and compared this with the housing allocation for the County as set out in the Draft Plan.

Whilst there is a difference in the figures the Council would consider that the figures in the Draft Plan are consistent with national and regional policy and generally consistent with the Housing Supply Target Guidelines.

The methodology for projecting the housing requirement during the plan period is set out in Section 4 of these Guidelines. The table below sets out the housing requirement for Louth in accordance with this methodology:

Table 1: Housing Supply Target Guidelines Methodology

Louth County Council		Annual Average	Number of relevant years	Total Households
A	ESRI NPF scenario projected new household demand 2017 to Q3 2027	857	10.75	9,214
B	Actual new housing supply 2017-Q3 2021	583	4.75	2,768
C	Homeless households, and estimated unmet demand as at Census 2016	N/A	N/A	233
D	Housing Demand Q4 2021-End of Q3 2027 =Total (A-B+C)/6	1,113	6	6,679

Based on the methodology in the Housing Supply Target Guidelines the projected housing target for Louth during the plan period is 6,679 units. In comparison the Draft Plan has projected a housing requirement of 8,278 units. There is a difference of c.1,600 units in the figures.

The reason for the difference in the figures is in the methodology of the calculation which is set out earlier in this response.

In addition to the different methodology used in calculating the figure, there is also a difference in the figure for the number of units completed. In the Draft Plan the period used was 2016-2020 whilst the methodology in the Guidelines is from 2017-Q3 2021. The Draft Plan estimated 2,040 units were completed between 2016-2020 (column H of the Core Strategy Table) while the new methodology is based on CSO housing completion data, which indicates that 2,768 units have been completed between 2017 and Q3 of 2021 (note the figure for Q3 in 2021 is based on an estimated figure).

As part of the comparison of the figures it is considered appropriate to update the housing allocation as set out in the Draft Plan to take account of the updated CSO household completion data. This will allow for greater alignment between the figures in the Draft Plan and that based on the methodology in the Guidelines. This is set out in more detail in the table below:

Table 2: Difference in Draft Plan Housing Allocation and Allocation based on HSTG

A	Louth projected additional housing units 2016-2027	10,318 units
B	Total units completed 2017-Q3 2021 as per CSO data	2,768 units
C	Housing allocation 2021-2027 (A-B)	7,550 units
D	Housing Target based on Housing Supply Target Guidelines	6,679 units
E	Difference	871 units

Over the lifetime of a Development Plan a figure of 871 units is not considered significant, particularly in a County such as Louth which has a strong urban fabric and hierarchy including two Regional Growth Centres that have the capacity to absorb additional population and residential growth on a sustainable platform. Almost 70% of the housing unit allocation for the County has been directed to these two growth centres. This demonstrates that these settlements are the focal point of the growth strategy for the County during the plan period.

In addition to differences in the figures for household completions, when reviewing the potential reasons for the differences in the figures the Council also identified that one of the reasons is due to the Housing Supply Target Guidelines not factoring in the provision for headroom in the calculation of population projections allowed for in the NPF Implementation Roadmap.

In this regard there was an allowance for Louth to include an additional 25% headroom in its population projection up to 2026. This additional headroom was utilised by the Council. The Growth Strategy for the County, which is centred around the Regional Growth Centres of Drogheda and Dundalk and creating a critical mass of population in these settlements, which have a targeted population of 50,000 in 2031 in the RSES, is based on the inclusion of this headroom.

This is confirmed in the table below, which sets out the difference in the population projection between the NPF Implementation Roadmap and that used to project the housing target in the Housing Supply Target Guidelines.

Table 3: Difference in population between NPF Roadmap and figure used in HSTGs

Local Authority	Population 2016	Population Projection 2026 NPF Implementation Roadmap	Pop. Projection 2026 plus 25% headroom	NPF 50:50 City Scenario 2026 pop. Projection	Difference
Louth	129,000	139,000 – 144,500	141,500 – 148,404	141,742	6,662

The fact that these Guidelines are largely silent on this issue presents a challenge for these targets being transposed into Development Plans.

The Council accepts that notwithstanding the potential inconsistencies between population projections and housing targets as set out above the housing targets for each Local Authority area based on the methodology in the Guidelines are intended to express national and regional population targets. The Council therefore accepts the housing target should be based on the methodology in the Housing Supply Target Guidelines. In this regard, based on the methodology in these Guidelines the Council calculates the housing target in Louth during the life of this Plan to be 6,679 units.

In the interests of clarity the Council considers that it would be appropriate to include an updated Core Strategy Table in this response to indicate how the revised housing allocation would be distributed across the County. In distributing this housing the percentage of housing allocated to each settlement equates to the population allocation. This is set out in the table overleaf.

Notwithstanding the above, as indicated at the outset of this response there is no mechanism at this stage of the Plan process to update the Core Strategy to demonstrate alignment with the Housing Supply Target Guidelines. However within 6 months of the adoption of this Plan a variation will be prepared in order to update the Core Strategy to align it with these Guidelines.

**Chief Executive’s Recommendation: -
MA Recommendation 1 i) – Core Strategy and Housing Supply Targets**

No Change

Table 4: Core Strategy Table based on the Housing Supply Target Guidelines methodology. NOTE THIS TABLE IS FOR INFORMATION PURPOSES ONLY

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M
Settlement Category	Settlement	Population 2016	Projected Population Increase to 2027	Projected Population 2027	Total Projected Housing Stock 2027	Total Additional Housing Units 2016-2027	Approx. Units Completed 2016-2020	Housing Allocation 2021-2027	Lands with potential to deliver Infill or Brownfield Development (ha)	Potential units to be delivered on Infill/ Brownfield Lands	Total Lands Zoned New Residential Phase 1 (ha)	Total lands zoned New Residential (Phase 1 and Phase 2) (ha)
County	Louth	128,884	21,082	149,966	61,717	10,318	2,040	8,278 6,679	110.4	4,302	589 439.4	587.2
Regional Growth Centre	Drogheda	34,199	6,914	41,113	17,184	3,443	400	3,043 2,525	34.8	1,725	269 270	270
	Dundalk	39,004	7,660	46,664	19,892	3,541	935	2,606 2,438	30	1,743	213 89.4	93.7
Self-Sustaining Growth Towns	Ardee	4,928	1,655	6,583	2,751	749	165	584 454	8.5	298	54.6 31.1	49.1
	Dunleer	1,822	935	2,757	1,144	425	80	345 167	3.1	109	13 7.5	8.4
Self-Sustaining Towns	Carlingford	1,445	200	1,645	881	41	0	41 53	2.6	31	2.2 2.0	1.4
	Castlebellingham / Kilsaran	1,126	110	1,236	597	87	8	79 67	1.1	27	10.9	10.9
	Clogherhead	2,145	300	2,445	1,034	139	0	139 67	1.6	39	2.9 3.2	3.2
	Termonfeckin	1,579	250	1,829	663	81	40	41 67	3.4	40	2.4 4.5	4.5
	Tullyallen	1,547	220	1,767	630	130	15	115 53	1.2	29	0	0
Small Towns & Villages	Level 4 Settlements	5,103	785	5,888	2,405	436	22	414 140	24.1	260	21 20.8	20.8
Rural Nodes	Level 5 Settlements	35,986	300	38,039	14,536	1,246	375	871 648	N/A	N/A	N/A	N/A
Rural Area	Rural Area		1,753									

Chief Executive's Response:

MA Recommendation 1 ii) – Core Strategy and Housing Supply Targets

In response to MA Recommendation 1 ii) of the OPR submission a review of the potential residential land that can be delivered on lands zoned for residential and mixed uses has been carried out. The Growth Strategy of this Plan, which seeks to prioritise population and economic growth in the higher tier settlements, and in particular the Regional Growth Centres of Drogheda and Dundalk, is based on the principles set out in national and regional policy including compact growth, consolidation of urban centres, and the creation of healthy, sustainable communities. In response to Recommendation 4 of the OPR submission to the Draft Plan phasing has been introduced in order to manage the release of residential lands.

A detailed review of the lands zoned A2 New Residential will be carried out as part of the preparation of the Joint Local Area Plan for Drogheda, with the phasing of the release of these lands for development forming part of the growth strategy of the Joint Plan.

In identifying lands for residential development cognisance must be taken of the fact that there are strategically located lands that, for various reasons, may not be released for development. Whilst the Planning Authority will continue to promote the development of such lands through its Active Land Management Strategy, it is important that this is factored into the quantum of residential lands available for development, in order to ensure the demand for housing in the County can be met.

Another factor that has been considered is the likelihood of extant permissions being developed. This includes Strategic Housing Developments which have received a grant of permission but have yet to commence development.

Taking the foregoing factors into consideration it is not proposed to make any further amendments to the land use zoning in each settlement in response to this recommendation. Rather, as part of the monitoring of residential development in each settlement under policy objective HOU 6, the level of residential activity will be closely managed and monitored to ensure the output of housing in each settlement is aligned with the housing allocation as set out in the Housing Supply Target Methodology Guidelines. To strengthen this monitoring process it is recommended that policy objective HOU 6 is amended to include additional text referring to these Guidelines. As part of the preparation of the Local Area Plans for Drogheda, Dundalk, Ardee, and Dunleer there will also be opportunities to review the quantum of residential lands available taking account of the housing allocation for each settlement as set out in the Core Strategy.

With regards to achieving compact growth there is a strong policy framework in the Plan that is centred around the consolidation of urban centres and achieving compact growth. It is considered that the location of residential lands in settlements is such that it will not result in the creation of unsustainable patterns of development such as urban sprawl.

**Chief Executive's Recommendation: -
MA Recommendation 1 ii) – Core Strategy and Housing Supply Targets**

Amend policy objective HOU 6 as follows:

HOU 6 To monitor and maintain a record of residential development permitted in settlements designated under the Settlement Hierarchy and development permitted in rural nodes and the open countryside for compliance with the objectives of the Core Strategy and in accordance with any forthcoming Departmental guidance published around the establishment of a HNDA coordination and monitoring unit and related implementation of a centralised spatial database for Local Authority Housing.

**Chief Executive's Response:
MA Recommendation 1 iii) – Core Strategy and Housing Supply Targets**

In response to MA Recommendation 1iii) taking account of the fact that the Core Strategy is not being updated Appendix 17 'Implementation of Section 28 Ministerial Planning Guidelines' of the Draft Plan will not be updated at this time.

**Chief Executive's Recommendation: -
Recommendation 1 iii) – Core Strategy and Housing Supply Targets**

No Change

MA Recommendation 2 – Phasing

The planning authority is required to:

- (i) Include concrete criteria in the Plan against which a decision would be taken to release A3 Phase 2 lands ahead of A3 lands that will ensure that future development of the settlements are consistent with the requirements for compact growth, sequential approach, the promotion of sustainable settlement and transport strategies under s.10(2)(n) and relevant Section 28 Guidelines including the Housing Supply Target Methodology for Development Planning Guidelines (2020);
- (ii) Amend the core strategy table to include total quantum of lands zoned for residential development as required under section 10(2A)(c).

Chief Executive's Response: MA Recommendation 2 – Phasing

MA Recommendation 2 item i) – Phasing

The policy objective relating to the release of 'New Residential Phase 2' clearly states that lands will only be released for development in specific circumstances and where it can be demonstrated the release of such lands would contribute to consolidated patterns of development.

There is no objection to providing additional guidance and criteria for the release of these lands.

Recommendation 2 item ii) – Phasing

The Core Strategy Table as amended in the Material Alterations includes details of the total lands zoned ‘A2 New Residential Phase 1’ in each settlement. This table can be updated to include the total quantum of residential lands zoned ‘A2 New Residential Phase 1’ and ‘A3 New Residential Phase 2’.

Chief Executive’s Recommendation: – MA Recommendation 2 i) and 2 ii)

2 i) Insertion of additional text into Section 13.9.6

The release of lands zoned ‘A3 – New Residential Phase 2’ will not be considered until after the 2 Year Progress Report of the County Development Plan has been prepared and given to the Elected Members.

One of the following two criteria will have to be satisfied for the written agreement of the Planning Authority prior to the release of any lands identified as ‘A3 – New Residential Phase 2’:

Criteria Number	Description
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1	At least 75% of the lands identified as ‘A2 New Residential – Phase 1’ in the immediate vicinity of the Phase 2 lands have been developed (immediate vicinity means approximately 500m from the subject lands).
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Or

2	The annual rate of residential completions in the settlement is less than 50% of the projected annual average output for the settlement. This is based on the housing allocation in the settlement as set out in the Core Strategy Table divided by the duration of the Plan i.e. 6 years.
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In addition to fulfilling criteria 1 or 2 the Planning Authority will give consideration to the following:

1. **Extant permissions** – Consideration will be given to any extant permissions within approximately 500 metre area of the subject lands, the date of expiration of the permission and a realistic assessment of the likelihood of the permission being implemented (applicable to criteria 2 only).
2. **Infill and brownfield lands** – The capacity of infill and brownfield lands within approximately 1,000 metres of the subject lands and in particular larger sites with a potential to deliver in excess of 100 units.
3. **Lands zoned ‘A1 Existing Residential’** – The capacity of lands zoned ‘A1 Existing Residential’ within approximately 1,000 metres of the subject lands and in particular larger sites with a potential to deliver in excess of 100 units.
4. **Quantum of lands available** – The quantum of ‘A3 New Residential – Phase 2’ lands to be released will not result in the housing allocation as set out in the Core Strategy Table for the respective settlement being exceeded. This shall take into consideration a realistic assessment of the likelihood of the implementation of extant permissions, having regard to the remaining duration of such permissions; in addition to the rate of household completions during the plan period.

5. **Compact growth** – The location of the ‘A3 – New Residential Phase 2’ lands proposed to be released shall be in a location that is within walking distance of schools, facilities, and services and the development of the lands will contribute to a consolidated pattern of development.

Applicants are advised to consult with the Planning Authority to discuss the above criteria prior to lodging any planning application on lands zoned ‘A3 New Residential – Phase 2’. Any planning application on lands zoned ‘A3 New Residential – Phase 2’ shall include supporting documentation with respect to the above.

Recommendation 2ii) - Update the Core Strategy Table to provide details of the total quantum of residential lands zoned ‘A2 New Residential Phase 1’ and ‘A3 New Residential Phase 2’. See Appendix 2 for details.

MA Recommendation 3 – Local Area Plans

Arising from Recommendations 1 and 4, having regard to:

- (i) The significant scale of excess zoning for A2 New Residential, including having regard to the implementation of the Housing Supply Target Methodology for Development Planning Guidelines (2020);
- (ii) The significant infrastructural constraints on the extensive Northern Environs of Drogheda and in other settlements affecting New Residential lands (A2 and A3) and other land use zones E2 including Business and Technology in Dundalk;
- (iii) The decision not to include phasing for the proposed New Residential land use zones in Drogheda;
- (iv) The provisions of the draft Plan concerning the requirement for non-statutory Master Plans for Drogheda, Dundalk, Ardee and Dunleer to address phasing, infrastructural capacity constraints and environmental constraints (such as flooding) which are matters required under legislation and/or policy and/or Section 28 Guidelines to be addressed in statutory plans; and
- (v) In view of the planning authority’s commitment to preparing Local Area Plans for Drogheda, Dundalk, Ardee and Dunleer;

The planning authority is required to commit to providing the necessary detailed phasing requirements based on the evidence-base (infrastructure assessment and capacity in consultation with infrastructure providers) and policy context in the Local Area Plans, supported by Local Transport Plans, to replace and/or direct any subsequent Master Plans in order to support the fast-track delivery of housing and employment in the right locations.

Chief Executive’s Response: MA Recommendation 3 – Local Area Plans

The County Development Plan, when adopted, will provide the framework for the preparation of the Local Area Plans in Drogheda, Dundalk, Ardee, and Dunleer. The preparation of these Local Area Plans will provide an opportunity to carry out a more in-depth analysis of the land use strategy in each of these settlements within the context of the policy framework set out in the County Development Plan and National and Regional policy.

The Local Transport Plans for Drogheda and Dundalk to be prepared alongside the Local Area Plans for these settlements will assist in the integration of land use and transport planning and provide a framework for planning for the efficient movement of people, goods, and services within and to and from these settlements.

While there is an extensive area of lands zoned for residential development in the Northern Environs of Drogheda, there are also extant permissions on the majority of these lands and development has commenced at various locations. It should also be recognised that while these lands are referred to as the Northern Environs of Drogheda the lands in question are very centrally located relative to the traditional town centre, key educational facilities such as Drogheda Institute of Further Education, Ballymakenny College, St. Joseph's CBS, Greenhills College and major employers including the Lourdes Hospital, Greenhills Business park, Boyne Enterprise Centre to name but a few.

It is accepted that there will be a need to phase future residential development and Section 2.13.6 of the Draft Plan states that there "will be a requirement for a phased approach to be taken to the development of the Northern Environs." As part of the preparation of the Joint Local Area Plan for Drogheda this phasing will be examined in greater detail, with a phasing strategy for these lands set out in the Joint Local Area Plan. It was considered more appropriate to set out a more refined phasing programme in the LAP given that construction activity was affected by Covid-19 restrictions. The CDP provides a 6 month time frame for the commencement of the LAP process and this is considered reasonable to facilitate data gathering of housing completions and a more informed phasing programme in Drogheda to be established with a focus on consolidating development at key locations to support sustainable and healthy communities.

With regards to infrastructural constraints it is accepted that in the Northern Environs of Drogheda the progression of the Port Access Northern Cross Route (PANCR) is a major project that is likely to take a significant period of time to progress.

Nonetheless consideration must also be given to the fact the PANCR is a critical piece of enabling infrastructure for Drogheda that will have multiple benefits including opportunities for the regeneration of the town centre area, removing port related traffic from the town centre, and facilitating residential and population growth in the Northern part of the town. This is recognised in regional policy including RPO 4.12 of the RSES. Taking this into account the progression of the PANCR will be a key element of the Joint Local Area Plan for Drogheda.

Section (ii) of Recommendation 3 refers to infrastructural constraints on A2 New Residential and E2 Business and Technology lands in Dundalk. Whilst it is acknowledged that upgrades to transport and water services infrastructure have been identified on these lands these infrastructure requirements could be provided as part of the development of the said lands. This approach has been taken in the build out of existing employment lands in the Mullagharlin area and has worked successfully to date. It is therefore not considered that any phasing of these lands would be required.

With regard to item 3 iv) it is considered that further clarification is required to be provided in relation to the Master Plans. The purpose of the Master Plans is to provide a more detailed and co-ordinated framework for the development of the lands that will assist in the Development Management process. The OPR will be aware that it is proposed to introduce phasing of residential lands in Dundalk and Ardee to manage the release of residential lands for development whilst in Dunleer it was not considered necessary to include such phasing.

The only Master Plan with specific criteria on phasing is the Northern Environs Master Plan for Drogheda. As set out above a detailed examination of the residential lands will be carried out, as part of the Joint Local Area Plan with proposals for the phasing for the development of the residential lands set out.

All existing lands within the Master Plan Areas have been zoned for a considerable period of time. This includes the lands in Master Plan 7 in Dundalk (E2 Business and Technology), which are zoned 'Residential 2' in the Dundalk and Environs Plan 2009-2015.

The preparation of the Local Area Plans for Drogheda, Dundalk, Ardee, and Dunleer will be evidence based and will involve close consultation with all relevant stakeholders including transport and infrastructure agencies in order to ensure the future development of these centres will be based on principles of sustainable growth and development and aligned with national and regional policy. An additional policy objective is recommended to be inserted into Chapter 2 in this regard. An additional policy objective relating to the phasing of residential lands in Drogheda will also be included.

Chief Executive's Recommendation: – MA Recommendation 3

Insertion of additional policy objectives into Chapter 2:

CS** To ensure a plan-led and evidence based approach is taken to the preparation of the Local Area Plans for Drogheda, Dundalk, Ardee, and Dunleer whereby the respective Plans are informed by the Local Transport Plans (for Drogheda and Dundalk), the Infrastructure Assessment and Land Use Evaluation for the respective settlement, and any other relevant information available from statutory bodies, government agencies, or infrastructure providers.

CS** In order to ensure consistency with the Core Strategy housing allocation as set out in the County Development Plan, as part of the preparation of the Joint Local Area Plan for Drogheda a review of lands zoned A2 New Residential in the Northern Environs area will be carried out and a phasing strategy will be set out. This will take account of the designation of Drogheda as a Regional Growth Centre in national and regional policy, the housing allocation for Drogheda in the Core Strategy, the availability of transport infrastructure and water services, and ensuring the Northern Environs retains its potential to function as a counter balance to the Southern Environs of the town.

MA Recommendation 4 – Proposed Amendments to Zoning Objectives

Having regard to:

- The population and housing targets for the individual settlements set out in the core strategy and to the lower housing supply target that will apply through the implementation of the Section 28 Housing and Supply Targets Methodology Guidelines for Planning Authorities (2020);
- The requirement under the Guidance Notes for Core Strategies (2010) that the core strategy provides a transparent evidence-based rationale of the amount of land to be zoned for residential and allied mixed-use zoning;
- The national and regional objectives for compact growth (NPO 3c and RPO 3.2); and
- The requirement under the ‘Development Plan Guidelines for Planning Authorities’ (2007) that a sequential approach to the zoning of lands is applied;

The planning authority is required to remove the following proposed amendments:

- (i) Dundalk - Proposed amendments DLK7 (A2 New Residential Phase 1), DLK3 (A2 New Residential Phase 1 and A3 New Residential Phase 2) and DLK22 (A3 New Residential Phase 2);
- (ii) Ardee – Proposed amendment ARD3 from Rural Policy Zone 2 to A3 New Residential Phase 2;
- (iii) Carlingford – Proposed amendment L3-2 from Rural Policy Zone 2 to A3 New Residential Phase 1;
- (iv) Glenmore and Lordship – Proposed amendments L5-5, L5-6, L5-7, L5-8 and L5-9 from Rural Policy Zone 1 and 2 to Rural Node;
- (v) Sandpit – Proposed amendment L5-12 to change from Rural Policy Zone 2 to Rural Node and proposed amendment L5-13 to change from Rural Node to Rural Policy Zone 2.

Chief Executive’s Response:

MA Recommendation 4 – Proposed Amendments to Zoning Objectives

The concerns raised by the OPR regarding the proposed amendments to the land use zonings and boundary changes are noted. A response to each of the proposed amendments the OPR has requested to be removed is set out below.

Material Alteration no. DLK 3

There are 2no. extant planning permissions on these lands for 582 residential units that are due to expire in Q4 of 2024. Whilst the concerns raised by the OPR that the zoning of these lands does not provide for a sequential pattern of development or the creation of compact growth are noted, it was considered appropriate that these lands have a residential zoning to take account of the existing permission on these lands.

This is consistent with the approach taken on other lands in Dundalk and indeed other settlements in the County such as Drogheda.

In an acknowledgement of the fact that the development has not yet commenced on site in addition to the fact that there is an excess of residential lands available for development in Dundalk it is proposed to phase these lands, with 19.4ha of the lands identified as ‘A3 New Residential – Phase 2’ and 3.6ha identified as ‘A2 New Residential – Phase 1’.

As part of the preparation of the Local Area Plan for Dundalk there will be a further opportunity to review the phasing and land use zoning at this location. If it becomes apparent that these lands are not being brought forward for development consideration will be given to amending the zoning on the lands to take account of the location of the lands with regard to compact growth and a sustainable pattern of development. It is therefore considered that these lands should be retained as proposed in Material Alteration no. DLK 3.

Material Alteration no. DLK 7

This consists of c.3.8ha of lands in the Mount Rath Area of Dundalk to the west of the Ardee Road. These lands are removed from the established built up area of Dundalk and the development of these lands will not result in a sequential pattern of development. The Infrastructure Assessment identified constraints in water services infrastructure in this part of Dundalk whilst upgrades to the road infrastructure would also be required to facilitate the development of the subject lands and the wider area.

The zoning of these lands would be at variance with national and regional policy with regards to compact growth and a sequential pattern of development as it would result in the 'leapfrogging' of more suitable residential lands which would result in the creation of urban sprawl and an unsustainable pattern of development. It is recommended that DLK 7 is not included as a Material Alteration and this zoning reverts back to that as proposed in the Draft Plan i.e. Strategic Reserve.

Material Alteration no. DLK 22

The lands associated with proposed Material Alteration DLK 22 were zoned 'A2 New Residential' in the Draft Plan. In response to Recommendation 4 of the OPR submission to the Draft County Development Plan with regards to the quantum of lands zoned for residential development it was recommended to amend the zoning to 'A3 New Residential – Phase 2'.

These lands lie between existing shops, services and facilities along the Newry Road and an existing residential development Lios Dubh off the Armagh Road and in the long term, there is an opportunity to create an infill development at this location. There is no objection to changing these lands back to 'A2 New Residential – Phase 1'. It is therefore recommended that DLK 22 is not included as a Material Alteration and those lands revert back to that as proposed in the draft Plan.

Material Alteration no. ARD 3

The subject lands are located outside the existing settlement boundary of Ardee and are vulnerable to flooding with part of the lands located in Flood Zones A and B. The OPR submission to the Draft Louth County Development Plan raised concerns in relation to the quantum of residential lands available for development in Ardee. Taking this into account it was recommended to introduce a new land use zoning category 'A3 New Residential – Phase 2'.

There is a requirement for the quantum of residential lands to be aligned with the projected housing allocation for each settlement as set out in the Core Strategy. The identification of the proposed additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy, as the identification of additional lands for residential development, albeit Phase 2 residential development, would result in a further increase in excess lands for residential development over and above that required to meet the projected population increase during the Plan period. In addition, the majority of the lands identified are vulnerable to flooding and further inclusion of the lands within the development boundary would militate against compact, sequential and sustainable growth, exacerbate peripheral development and elongate the development boundary at this location. It is recommended that ARD 3 is not included as a Material Alteration and these lands are removed from within the settlement boundary of Ardee and revert back to Rural Policy Zone 2.

Material Alteration no. L3-2

In the Draft County Development Plan the subject lands were located outside the settlement boundary of Carlingford to the south east of the settlement. Their inclusion would result in a pattern of sprawl which would be detrimental to the overall character of the settlement and would be contrary to national and regional planning policy. It is recommended that L3-2 is not included as a Material Alteration and these lands are removed from within the settlement boundary of Carlingford and revert back to Rural Policy Zone 2.

Material Alteration no. L5-5

The subject lands were located outside of the boundary of Glenmore in the Draft County Development Plan within an Area of High Scenic Quality (AHSQ). It is considered that there are sufficient lands available within Glenmore to cater for any demand for housing which may arise during the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands. The inclusion of the subject lands would exacerbate ribboning and sprawl, which would be detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

It is recommended that L5-5 is not included as a Material Alteration and these lands are removed from within the boundary of Glenmore and revert back to Rural Policy Zone 1.

Material Alteration no.s L5-6, L5-7, L5-8, and L5-9

The subject lands are located outside of the boundary of Lordship in the Draft County Development Plan within an Area of High Scenic Quality (AHSQ). It is considered that there are sufficient lands available within Lordship to cater for any demand for housing which may arise during the Plan period. The inclusion of the subject lands would exacerbate ribboning and sprawl, which would be detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

It is recommended that L5-6, L5-7, L5-8, and L5-9 are not included as Material Alterations and these lands are removed from within the boundary of Lordship and revert back to Rural Policy Zone 1 and Rural Policy Zone 2 (as applicable).

Material Alteration no.s L5-12 and L5-13

The subject lands under Alteration no. L5-12 are proposed to be included within the boundary of Sandpit with the subject lands under Alteration L5-13 to be removed. The lands under Alteration L5-13 were proposed to be removed in order to ensure the quantum of lands within the boundary of Sandpit would not be increased.

Under the Draft Plan the L-6303-0 provided a definitive boundary to Sandpit. The subject lands under Alteration no. L5-13 are brownfield lands and are considered to be more appropriately located for development.

It is recommended that proposed Material Alterations L5-12 and L5-13 are not included as material alterations to the Draft Plan and the boundary of Sandpit reverts back to that as proposed in the Draft County Development Plan.

Chief Executive's Recommendation: – MA Recommendation 4

It is recommended the following zonings and boundary changes are not included as material alterations and the zoning/boundary change reverts back to as proposed in the draft County Development Plan:

- Dundalk – Material Alteration no. DLK 7
- Dundalk – Material Alteration no. DLK 22
- Ardee – Material Alteration no. ARD 3
- Carlingford – Material Alteration no. L3-2
- Glenmore – Material Alteration no. L5-5
- Lordship – Material Alteration no's L5-6, L5-7, L5-8, and L5-9
- Sandpit – Material Alteration no's L5-12 and L5-13

Please refer to Appendix 1 for details of the mapping changes associated with the recommendation set out above.

MA Recommendation 5 – Tiered Approach to Zoning

Arising from Recommendation 6, and having regard to the requirements under NPO 72a, NPO 72b and NPO 72c to apply the tiered approach to zoning in accordance with Appendix 3 of the NPF, the Office recommends that the planning authority revise the policy objective approach in the Plan to ensure it is consistent with the Tiered Approach to Zoning for the following IALUE sites:

- Drogheda site 1 A2 New Residential (Northern Environs), site 5 I1 Tourism and Leisure, and site 13 (Transportation Hub);
- Dundalk site 3 E1 General Employment, site 21 I1 Tourism and Leisure, site 11 (L1 Strategic Reserve, subject of proposed amendment DLK8 to E2 Business and Technology) and site 13 (E2 Business and Technology) and site 27 E1 General Employment.

Chief Executive's Response - MA Recommendation 5 – Tiered Approach to Zoning

The IALUE was prepared in the absence of any national guidance other than that set out in Appendix 3 of the NPF. The intention of the IALUE is to inform the preparation of the Draft Plan. The summary table setting out the 'Red, Amber and Green' colour coding is not intended to be read in isolation but rather in conjunction with the more detailed table setting out the infrastructure investment required on the particular site. Where lands have been identified as 'Red' in the summary table a review of the infrastructure requirements will indicate that there are in fact potential solutions available to providing the required infrastructure. Any infrastructure deficiencies identified relate to water and waste water. The OPR will be aware that there are many instances where, following consultation with infrastructure agencies including Irish Water, developers can reach solutions that can overcome the deficiencies in such infrastructure.

Drogheda

Sites 1 and 5 in the IALUE are located in the area referred to as the Northern Environs of the town. Site 1, which is an expansive area of lands zoned for new residential development can be partially serviced. The response to Recommendation 3 of the OPR submission sets out that a phasing strategy for these lands will be introduced as part of the preparation of the Joint Local Area Plan. Irish Water are currently undertaking a review of Water and Wastewater Infrastructure in this part of Drogheda which will inform future investment decisions.

Site 13 is strategically located adjacent to the rail station in the town. Given the strategic location of these lands it is considered appropriate to retain this zoning. In addition there are potential solutions to addressing the deficiencies in infrastructure at this location. It should also be noted that part of Site 13 was subject to a SHD application for 450 no. residential units, neighbourhood units, office building, and a crèche (ABP-305110-19). It was intended that there would be two accesses from the site onto a LIHAF funded road. The SHD was granted by An Bord Pleanála and subsequently quashed by Order of the High Court.

Dundalk

Site 3 is zoned for General Employment Uses where water and wastewater deficiencies have been identified. As part of the Drainage Area Plan for Dundalk potential solutions may be identified with regard to these deficiencies. These lands are strategically located with direct access off the inner relief road which leads to the Ballymascanlon roundabout. The nature of employment lands is such that the end use of the land can vary. This can include a use which requires limited water and waste water infrastructure.

Site 22 is zoned for Tourism and Leisure Uses where deficiencies in waste water infrastructure have been identified. As part of the Drainage Area Plan for Dundalk potential solutions may be identified with regard to these deficiencies. In addition consideration may also be given for the deficiencies to be addressed by developer led solutions.

Site 11 includes two land use zonings – Strategic Reserve and Business and Technology while Site 13 has a single land use zoning Business and Technology. Both Sites can accommodate development. However, to enable these sites to be fully developed, infrastructure upgrades would be required. This is not an uncommon issue and would not be considered an impediment to the release of the lands for development. The lands identified as Strategic Reserve in Site 11 will not be available for development during the life of this Plan. Site 13 consists of strategically located lands zoned for Business and Technology Uses which includes the IDA Science and Technology Park. The build out of these lands is ongoing, with construction presently concentrated on the southern side of the Southern Link Road. As these lands have been developed the necessary infrastructure has been provided. Given the importance of these Business and Technology lands to the economic development of Dundalk and the role and function of the town as a driver of economic growth and development in the region the Council engages regularly with infrastructure providers regarding any infrastructure investment required to facilitate the continued success of this area as a location for economic development.

Site 27 is zoned for General Employment uses. Deficiencies in water and waste water infrastructure have been identified. As part of the Drainage Area Plan for Dundalk potential solutions may be identified with regard to these deficiencies. In addition consideration may also be given for the deficiencies to be addressed by developer led solutions.

Local Area Plans

As part of the preparation of the Local Area Plans for Drogheda and Dundalk a review of infrastructure capacity and availability will be carried out. It is anticipated that the Drainage Area Plan for Dundalk and the Network Assessment in North Drogheda will be finalised or at an advanced stage which will provide further clarity on the potential solutions to any deficiencies in water services infrastructure.

It is recommended that an additional policy objective is inserted into Chapter 2 of the Plan that as part of the preparation of the Local Area Plans the Infrastructure Assessment and Land Use Evaluation (IALUE) is reviewed and updated to take account of any updated reports, assessments, or infrastructure investment decisions and investments.

Chief Executive's Recommendation: – MA Recommendation 5

Insertion of additional policy objective into Chapter 2:

CS ** To review the Infrastructure Assessment and Land Use Evaluation for Drogheda, Dundalk, Ardee, and Dunleer as part of the preparation of the Local Area Plans for these settlements and to ensure that any land use zoning is aligned to infrastructure availability.

MA Recommendation 6 – Rural Housing

Arising from Recommendation 10, and having regard to provisions of the Sustainable Rural Housing Guidelines for Planning Authorities (2005), the planning authority is required to remove the provisions regarding accommodation of backland development under section 13.9.43 of the plan.

Chief Executive’s Response: MA Recommendation 6 - Rural Housing

Backland development in the open countryside is considered to be an inappropriate form of development that is inconsistent with traditional settlement patterns. The proliferation of housing in the open countryside in recent years has resulted in an increase in the number applications on ‘backland’ sites to the rear of existing properties and/or down laneways. This is in part due to the more traditional sites for rural dwellings being developed, with applicants now applying in backland locations. This pattern of development is considered unsustainable and will result in the character of rural areas being further eroded.

Whilst the Draft Plan recognises the importance of supporting rural communities there is also a requirement to protect the landscape and rural area for future generations. In this regard any provision in the Plan to facilitate backland development would have a detrimental impact on the character and setting of rural areas and fail to appropriately integrate into the local landscape and should therefore be avoided.

However, the Council are constrained as to what it can consider at this stage of the process in that any further modifications must be made to a proposed material alteration. This is set out in Section 12 (7) (ad) (ii) of the Act. Taking account of the fact that the proposed material alterations placed on public display did not include any amendments to the issue of Backland Development in section 13.9.43 of the Draft Plan, the Council is precluded from recommending the provision regarding Backland Development is omitted. However, as set out in response to MA Recommendation 1i) of the OPR submission a variation will be prepared within 6 months of the adoption of this Plan in relation to the alignment of the Core Strategy with the Housing Supply Target Methodology Guidelines. When preparing this variation, a variation proposing to omit the provision for backland development as set out in section 13.9.43 will also be prepared.

Chief Executive’s Recommendation: – MA Recommendation 6

No Change

MA Observation 1 – Mullagharlin

Arising from proposed amendment DLK8 and the details of the IALUE, having regard to the scale of the E2 Business and Technology and C1 Mixed Use lands at Mullagharlin and along the N52 in proximity to junction 16 of the M1 motorway, and the potential significance of the development of these lands to drive the future growth and economic prosperity of Dundalk, the planning authority is advised to commit (in the final Plan) to preparing and incorporating an evidence-based plan for the future development of the proposed extended Business and Technology and Mixed Use lands at Mullagharlin as part of the Local Area Plan.

Chief Executive's Response: MA Observation 1 – Mullagharlin

The Local Area Plan for Dundalk will incorporate a detailed assessment of the development areas within the town. This will include the Mullagharlin area in the southern section of the town, which is an important area of the town for economic development.

A significant proportion of development has taken place in the Mullagharlin Framework Plan area including on IDA lands and Dundalk Institute of Technology (DkIT) campus. There is also an extant permission for 142 apartments on part of the Mixed Use zoned lands granted as a Strategic Housing Development. As these lands have been developed the necessary infrastructure investment and upgrades have been provided.

The Council is committed to facilitating and strengthening economic development in Dundalk. This is consistent with the designation of the town as a Regional Growth Centre. The Mullagharlin Framework Plan was published in 2008. The location of these lands is considered appropriate for employment and economic development uses, with significant opportunities for new businesses to develop synergies with existing businesses; in addition to the opportunities for collaboration with DkIT through research and development.

With regards to infrastructure requirements in the Mullagharlin area, whilst upgrades to infrastructure are required, the Council is satisfied that the lands can be serviced during the life of the Plan.

The OPR will be aware that in the Dundalk and Environs Plan 2009-2015 the lands associated with proposed amendment DLK 8 were zoned 'Residential 2'. The Council is satisfied that these lands can be serviced during the life of the Plan. It is considered that these lands are a natural extension to the employment lands in the Mullagharlin area and will ensure there are sufficient employment lands available to facilitate the long term economic growth of Dundalk, enabling the town to strengthen and consolidate its role and designation as a Regional Growth Centre.

As part of the preparation of the Local Area Plan for Dundalk a Local Transport Plan will be prepared in consultation with the transport agencies including the NTA and TII. This will assist in improving and strengthening the link between land use and transport planning in the town including the Mullagharlin area.

The conclusions and recommendations of the Local Transport Plan will inform the Growth Strategy for Dundalk in the Local Area Plan, which will be based on the principles of strengthening the economic role of Dundalk and creating an attractive, sustainable settlement for both population growth and economic investment.

Chief Executive's Recommendation: – MA Observation 1

No Change

MA Observation 2 – Modal Share Baseline and Targets

Arising from the planning authority's response to Recommendation 11 of the Office's submission on the draft Plan, which included the provision of detailed baseline data for modal share for the main settlements, in addition to extensive proposed amendments to policy context for transport under Chapter 7 'Movement', and having regard to the requirements under section 10(2)(n) of the Act, the planning authority is encouraged to:

- (i) Include modal share baseline at aggregate level for rural villages and the open countryside;
- (ii) Set realistic targets for modal change against the baseline figures provided for (a) the individual higher order settlements and (b) aggregate level for rural villages and the open countryside, to form a basis for an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and its climate change strategy.

Chief Executive's Response: MA Observation 2 – Modal Share Baseline and Targets

Additional baseline data can be provided for the self-sustaining towns and small towns and villages. However there is no aggregate data available on modal share in the open countryside.

As indicated in the previous CE Report there are no national modal change targets available with which the Plan is aligned. Rather than the Council setting its own target, it is considered that a target should be agreed with all the relevant stakeholders including the transport agencies. There will be an opportunity for further engagement with the transport agencies and in particular the NTA as part of the preparation of the Local Transport Plans for Drogheda and Dundalk.

This would result in a more co-ordinated approach for setting and realising targets and would ensure such targets can be aligned with the progression and delivery of sustainable transport projects.

Additional policy objectives will be recommended to be inserted into the Plan relating to working alongside various stakeholders in setting modal share targets as part of the preparation of Local Area Plans.

Chief Executive's Recommendation: – MA Observation 2

Insertion of additional tables into Section 7.5.1 'Current Travel Patterns in the County' and insertion of additional policy objectives into Section 7.5.1:

Current Travel Patterns in the County

At a settlement level the breakdown of the modal share follows a similar pattern to that at a County level. It is notable however that there is a higher dependence on the private car in the smaller settlements than the larger settlements. In Drogheda and Dundalk there are higher levels of people walking to school and work, whilst in Dundalk the number of people cycling to work is higher than that of the other settlements and County. In Drogheda the number of workers travelling by train is over twice that in Dundalk.

This is all an indication that in larger urban areas where there are more opportunities to walk and cycle and there are more public transport services available, more people will choose to use these modes of transport.

Table xx: Modal Share for Students and Workers in Self-Sustaining Towns 2016

Mode of transport	Work					School or College				
	C'ford	C'head	C'bgm	Tmfkn	Tulyln	C'ford	C'head	C'bgm	Tmfkn	Tulyln
Walk	19.7%	3.3%	6.8%	2%	1.7%	20%	34.3%	15.3%	16%	37%
Cycle	1.3%	0.5%	1%	1%	0%	1.3%	1.2%	5.6%	0%	0%
Bus	2.6%	4.5%	5%	2.3%	6.4%	13.2%	32.2%	36.2%	26.6%	26.1%
Rail	2.6%	3.5%	0.8%	3%	1.7%	0%	0.5%	0.5%	0.8%	0%
Car (driver)	60.7%	69.4%	69%	76.4%	77.6%	1.5%	2.8%	2%	2.8%	2.2%
Car (passenger)	2.2%	4.5%	6.4%	3.9%	4.7%	63.8%	29%	39.8%	53%	33.8%
Van	4.9%	11.5%	8%	5.9%	5.8%	0.2%	0%	0.6%	0.8%	0.7%
Work mainly at home	6%	2.8%	3%	5.5%	2.1%	0%	0%	0%	0%	0.2%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Table xx: Modal Share for Students and Workers in Small Towns and Villages 2016

Mode of transport	Work			School or College		
	Annagsn	Collon	Dromiskin	Annagsn	Collon	Dromiskin
Walk	2.5%	3.7%	4%	0%	36.3%	16.6%
Cycle	0%	0.9%	0.2%	0%	0.4%	1.4%
Bus	1.3%	7.1%	1.8%	17.9%	34.2%	31.1%
Rail	1.3%	1.2%	0.4%	0%	0%	0.4%
Car (driver)	73.4%	76.3%	72.9%	3.6%	3.3%	5%
Car (passenger)	8.3%	4.9%	6.8%	78.5%	25.8%	45.5%
Van	7.2%	5.2%	11.1%	0%	0%	0%
Work mainly at home	6%	0.7%	2.8%	0%	0%	0%
Total	100%	100%	100%	100%	100%	100%

Table xx: Modal Share for Students and Workers in Small Towns and Villages 2016

Mode of transport	Work				School of College			
	Knkbdge	Lth Vge	Omth	TInstn	Knkbdge	Lth Vge	Omth	TInstn
Walk	1%	5.9%	11.9%	3%	26.5%	26%	16%	27.7%
Cycle	0%	0%	0%	0.4%	0%	0.6%	0.8%	0%
Bus	2.1%	3%	1.6%	4.8%	26.5%	34.3%	27.5%	32.4%
Rail	1.7%	1.5%	0.5%	0%	0.6%	0.6%	0%	0%
Car (driver)	75.7%	70.3%	66.8%	70.4%	6.4%	1.7%	3.8%	0.7%
Car (passenger)	6.3%	4.8%	5.2%	9.2%	40%	37%	51.9%	38.5%
Van	10.1%	12.6%	9.8%	10%	0%	0%	0%	0.7%
Work mainly at home	3.1%	1.9%	4.2%	2.2%	0%	0%	0%	0%
Total	100%	100%	100%	100%	100%	100%	100%	100%

No data available for Baltray

Insertion of additional policy objectives into Section 7.5.1:

- MOV XX** To support a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking and the attainment of any national targets relating to modal change published during the life of this Plan.
- MOV XX** To set modal share targets in each new Local Area Plan in cooperation with the NTA, CARO, EMRA and other relevant stakeholders in accordance with any relevant Guidelines or targets published during the life of this Plan.

MA Recommendation 7 – Exceptional Circumstances for Access onto National Roads

Arising from the planning authority’s response to Recommendation 12 of the Office’s submission on the draft Plan, and having regard to the provisions of section 2.6 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) the planning authority is advised to omit the exemptions provided for under Table 7.5.

Chief Executive's Response:

MA Recommendation 7 – Exceptional Circumstances for Access onto National Roads

It should be noted that the Council are constrained as to what it can consider at this stage of the process and as per Section 12 (7) (ad) (ii) of the Act any further modifications must be made to a proposed material alteration. Taking account of the fact that the proposed material alterations placed on public display did not include any amendments relating to the issue of exceptional circumstances for access onto national roads the Council is precluded from carrying out this recommendation. Nonetheless it is considered appropriate to respond to the issues raised.

As set out in the response to Recommendation 12 of the OPR submission in the CE Report on Submissions to the Draft County Development Plan the Council is committed to safeguarding the capacity and safety of the national roads that traverse through Louth. The Council has liaised with the TII in eliminating traffic hazards along national roads. Indeed TII has supported such proposals.

Whilst every effort is made to implement the principles of a 'plan-led' approach in the preparation of a Development Plan, it is also important that the Plan can respond to particular circumstances as they arise. It is in this context that the exemptions as set out in Table 7.5 have been included. It should be noted that these exemptions will only be applied in exceptional circumstances.

TII, as a prescribed body, will be consulted as part of any application for a new access onto a national road and therefore would have a direct input into the decision making process of any such proposal.

Chief Executive's Recommendation: – MA Recommendation 7

No Change

MA Recommendation 8 – Development at National Roads Interchanges or Junctions

Having regard to the provisions under section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), the planning authority is required to remove proposed amendment 96 which is not consistent with the evidence-based approach to development at national roads interchanges or junctions.

Chief Executive's Response:

MA Recommendation 8 – Development at National Roads Interchanges or Junctions

The importance of managing development at or near national road interchanges or junctions is recognised, as are the strategic connections and accessibility the motorway provides. In this regard the Council is committed to ensuring the capacity or efficiency of interchanges or junctions is not compromised.

Drogheda and Dundalk are designated Regional Growth Centres in national and regional policy. In the NPF and RSES there is a strong policy focus on both settlements being developed into centres of scale to strengthen and consolidate their role as regional drivers of economic growth.

The proposed policy objective relating to development at the urban interchanges in Drogheda and Dundalk is a continuation of a policy from the current County Development Plan (policy EDE 12). Where any large developments are proposed in proximity to a motorway interchange a Traffic and Transport Assessment would be required to be carried out (see section 13.14.14 of the Draft Plan). This evidence based methodology will be used to assess the potential impact of any development on these interchanges.

It should be noted that the lands in the vicinity of the urban interchanges in Drogheda and Dundalk have been zoned for a considerable period of time. No additional lands are proposed to be zoned under this Plan, however under Material Alteration DLK8 zoning changes are proposed.

As part of the preparation of the Local Transport Plans for Drogheda and Dundalk there will be an opportunity to assess the existing and anticipated transport demand associated with existing and proposed land uses in the Plan area. These assessments will identify the potential for existing infrastructure to accommodate any increase in demand. The Council will be working alongside the NTA and TII in the preparation of the Local Transport Plans.

In order to ensure any development in proximity to these interchanges will not undermine their capacity or efficiency additional text will be inserted into the proposed policy objective requiring the preparation of a Traffic and Transport Assessment to assess the potential impact of the development on the relevant interchange.

Chief Executive's Recommendation: – MA Recommendation 8

Insert additional text into Material Alteration 96:

To promote and facilitate development at urban-related* interchanges in accordance with the zoning provisions for Drogheda and Dundalk as set out on the zoning maps for Drogheda and Dundalk in the Draft County Development Plan and any subsequent Local Area Plans adopted for these settlements. Any large scale development proposal in proximity to these interchanges will be required to prepare a Traffic and Transport Assessment in accordance with the requirements of the '2014 Transport and Traffic Assessment Guidelines'.

MA Recommendation 9 – Renewable Energy Targets

Arising from proposed amendment 138 and to the requirements under Specific Planning Policy Requirement for the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, the planning authority is required to include in the final Plan, either:

- (i) indicate how the implementation of the Plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); or
- (ii) include an objective to determine within 6 months of the making of the Plan how the implementation of the Plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

Chief Executive's Response: MA Recommendation 9 - Renewable Energy Targets

The Council acknowledges the critical importance it plays in achieving national targets and is committed to comprehensively addressing these requirements, including realising national targets and in particular wind energy production and potential wind energy resource in megawatts. However, at this stage of the Development Plan review process the Council is of the opinion that an evidence based response and justification of a quantum figure in megawatts to meet the requirements of the Specific Planning Policy Requirement (SPPR) for the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change', is not possible. It is important that any targets set out in the County Development Plan are informed by and consistent with other key strategic plans prepared by the Council in this regard. Consequently, and in accordance with the recommendations of the OPR, the Council will include a new Policy Objective in accordance with Recommendation 9 (ii).

Chief Executive's Recommendation: – MA Recommendation 9

Insertion of additional Policy Objective in Chapter 10:

IU XX The Council will determine how the implementation of the Plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts), within 6 months of making the Plan.

MA Recommendation 10 – Flood Risk Management

Arising from Recommendation 13 and proposed amendment Vol 5-5, the planning authority is required to resolve the conflict between the proposed zoning and the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and clarifying Circular PL2/2014 on the following sites in advance of the making of the Plan:

- Ardee – sites 2, 3 and 6;
- Carlingford – sites 1 and 2 including proposed amendment L3-5;
- Castlebellingham / Kilsaran – sites 1 and 2;
- Drogheda - sites 1 and 2;
- Dundalk - Sites 1, 4, 20 and 21;
- Omeath – Sites 1 and 2;
- Tallanstown – Sites 1, 2 and 3 and proposed amendment L4-10.

The planning authority is strongly advised to consult with the OPW in addressing this recommendation.

Chief Executive's Response: MA Recommendation 10 - Flood Risk Management

The response of the Council in relation to resolving conflict between the proposed zoning and the requirements of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) and clarification in relation to Circular PL2/2014 is addressed in the response to the Office of Public Works save with the exception of the following two responses which were not raised by the OPW but were raised in MA Recommendation 10 by the OPR.

Tallanstown:

Regarding Site 2 the majority of the lands at this location are identified as Flood Zone C and in relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is directed towards lands at low risk of flooding and in accordance with Tables 3.1 and 3.2 of the Guidelines. This is further strengthened through the inclusion of the new Policy Objective on foot of the OPW recommendation.

Carlingford:

In relation to Site 1 the majority of the lands at this location are identified as Flood Zone C and in relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is directed towards lands at low risk of flooding and in accordance with Tables 3.1 and 3.2 of the Guidelines. This is further strengthened through the inclusion of the new Policy Objective on foot of the OPW recommendation.

Chief Executive's Recommendation: MA Recommendation 10 - Flood Risk Management

No change to Tallanstown and Carlingford.

See OPW Response for the recommended changes in addition to those set out above.

Submission No.

LCDP MA014

Submitted by:

Office of Public Works (OPW)

Summary of Submission:

OPW welcomes the alterations MA7, MA134, MA135, MA151 and MA152.

Chief Executive's Response:

The Council welcomes the submission from the OPW and acknowledges its recognition of the Material Alterations. Comments from the OPW highlighting further opportunities in relation to the Draft Plan are addressed below in accordance with the headings contained in the Submission.

The submission makes the following comments:

MA 145: Flood Relief Schemes

The OPW welcomes that objective number IU27 has been updated to reference specific schemes. This text could be further clarified to ensure zoning or development proposals support and do not impede or prevent the progression of these measures.

Chief Executive's Response – MA 145

The Council has no objection to further clarifying IU 27 through the inclusion of additional wording to ensure zoning or development proposals support and do not impede or prevent the progression of these measures.

It is recommended that additional wording be included in IU 27 as outlined above.

Chief Executive's Recommendation: – MA 145 Flood Relief Schemes

Insert the following additional text into Policy Objective IU 27:

To implement the Flood Risk Management Measures as detailed in the Neagh Bann Flood Risk Management Plan, the eastern Flood Risk Management Plan and the Dunleer Flood Risk Management Plan, **ensuring that proposals for development support and do not impede the progression of these measures. Louth County Council will, in partnership with the OPW deliver the following Flood Relief Schemes:**

- Dundalk, Blackrock and Ardee;
- Drogheda and Baltray; and
- Carlingford and Greenore

MA 146: Consideration of Climate Change

The OPW welcomes the addition of text to Policy Objective IU25. The OPW recommend that, in line with the Guidelines, Louth County Council consider the impact of Climate Change at plan making stage, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, and specifying minimum floor levels.

Chief Executive Response – MA 146 Consideration of Climate Change

Climate action is a cross-cutting theme of the Draft Plan. As outlined in Chapter 12 ‘Climate Action’ the role of the Strategic Flood Risk Assessment (SFRA) is pivotal in informing the policy objectives and land use zoning objectives of the Draft Plan.

Therefore, all strategic land-use planning decisions taken within this Draft Plan have been informed by the findings of the SFRA, of which climate change has been a fundamental consideration. MA 146 provides further guidance specifically in relation to Flood Zone C in the future, through the requirement for consultation with the most up to date CFRAM Programme Climate Scenario Mapping, SFRA datasets and requiring details of structural and non-structural risk management measures etc. The OPW is also advised of Policy Objectives ENV 49 – ENV 54 of the Plan as they relate to Coastal Protection and Flooding.

Chief Executive’s Recommendation: – MA 146

No Change

National Indicative Fluvial Mapping (NIFM)

The OPW advises of the availability of the National Indicative Fluvial Mapping (NIFM) outputs to local authorities while advising of the applicable cautions and limitations of same.

Chief Executive’s Response – National Indicative Fluvial Mapping (NIFM)

The Council notes the availability of National Indicative Fluvial mapping (NIFM) outputs and will refer to same, where relevant, in relation to proposed development, whilst having regard to the indicative nature and limitations of such mapping.

Chief Executive’s Recommendation: – National Indicative Fluvial Mapping (NIFM)

No Change

MA Vol 5-5: Justification Tests

The OPW welcomes the inclusion of Justification Tests in the SFRA and notes that the Justification Test applies only to the urban centre and is not applicable to the periphery of urban areas. The Justification Test can only apply to Regional Growth Centres, Key Towns, and Self Sustaining Growth Towns.

In the discussion on various sites in the SFRA, it is stated that it is anticipated that “flood risk mitigation measures could be designed to allow development of the wider site, as necessary”. These specific mitigation measures should be outlined in the Plan in order that the zoning be considered justified.

Advises in relation to Section 5.28 of the Flood Risk Management Guidelines and Circular PL 2/2014. It is suggested that an additional Policy Objective be included in the Plan in relation to sites where only a portion of the land is at risk of flooding.

Chief Executive's Response: MA Vol 5-5: Justification Tests

The Council welcomes the OPW's acknowledgement of the Justification Tests in the Strategic Flood Risk Assessment. Thereafter, in response to the comments and concerns of the OPW with regard to application of the 3 Criteria as set out in Box 4.1 of the Guidelines, the following is the response of the Council:

At the outset, the Council wishes to state that the current Louth County Development Plan 2015-2021 was subject to a Strategic Flood Risk Assessment and was written having regard to the Flood Risk Management Guidelines (2009). During the intervening period (with the exception of Circular PL 2/2014) there has been no substantive update or material change to the aforementioned Guidelines. The Draft Plan is consistent with the National Flood Risk Management Guidelines. It is noted that the OPW did not raise any such concerns in respect of these zonings in their submission to the current County Development Plan 2015-2021. Consequently, the Council would query why, what was previously acceptable appears to be no longer considered acceptable.

Urban Centre: Criteria 2

In relation to the Core of an Urban Settlement and the issue of peripherality, the Council notes that the glossary as appended to the Flood Risk Management Guidelines refers to the core area of a town or village which acts as a centre for a broad range of functions including employment, retail, community, residential and transport. It is considered beneficial at this juncture to provide clarification in terms of a potential misunderstanding in terminology between the Draft Plan and the Flood Risk Management Guidelines.

The identification of the 'Town or Village Centre' zoning objective in the Draft Plan is to guide future potential development within the Settlement and is not so designated to solely serve for the identification of the 'Core' of the Settlement (as per the Flood Risk Management Guidelines). There are a range of land use zoning objectives (including *inter alia* employment and residential land uses) adjoining this 'Town or Village Centre' zoning which in the Council's opinion act as a centre for a range of essential functions intrinsic to the settlement as per the Guidelines. Consequently, the Council considers it appropriate that such lands have been subject to the Justification Test.

Urban Settlements Targeted for Growth: Criteria 1

Urban settlements identified for growth in the NPF, RSES and Development Plan includes the two Regional Growth Centres of Drogheda and Dundalk and the Self Sustaining Growth Towns of Ardee and Dunleer. Within the Draft Plan, the vast bulk of the projected population growth is targeted to these four urban settlements consistent with national and regional policy. Notwithstanding this, there is residual population growth designated and allocated to the remainder of the County in line with the Plan's Settlement Hierarchy. In this regard, the Policy Objectives of the Draft Plan support the continued sustainable growth of

Louth's Self-Sustaining Towns and Small Towns and Villages at an appropriate level in line with this hierarchy. To this end, the Council has identified lands suitable for development to facilitate balanced and proportionate population and economic growth while supporting the creation of vibrant communities by targeting and managing sustainable growth.

It is considered that this approach has been developed taking account of the function and role of each of the identified settlements in close alignment with the policy parameters of both the NPF and the RSES. Taking this into account the Council considers it appropriate to include the lower tier settlements in Criteria 1 of the Justification Test.

FRA to appropriate level as part of SFRA: Criteria 3

Whilst the OPW has advised that specific mitigation measures be outlined in the Plan to justify the zoning, the Council considers that the Policy Objectives of the Draft Plan are sufficiently robust to ensure that as part of any planning application that flood risk can be appropriately managed and in this regard attention is particularly drawn to IU 24, IU 25 and IU 26 as set out below:

IU 24: *To reduce the risk of new development being affected by possible future flooding by:*

- *Avoiding development in areas at risk of flooding and*
- *Where development in floodplains cannot be avoided, taking a sequential approach to flood risk management based on avoidance, reduction and adaptation to the risk.*

IU 25: *To ensure all proposals for development falling within Flood Zones A or B are consistent with the "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" 2009. Proposals for development identified as being vulnerable to flooding must be supported by a site specific Flood Risk Assessment and demonstrate to the satisfaction of the Planning Authority that the development and its infrastructure will avoid significant risks of flooding and not exacerbate flooding elsewhere.*

IU 26: *Where a site specific Flood Risk Assessment demonstrates that there are significant residual flood risks to a proposed development or its occupiers in conflict with "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" 2009, planning permission will normally not be granted unless the requirements of Section 5.28 can be satisfied.*

The SFRA requires a detailed Site Specific Flood Risk Assessment be submitted with any planning application to address flood risk, propose mitigation measures and assign appropriate development, and should address the Sequential Approach within the Site.

Further and in addition to the existing Policy Objectives, and in accordance with the requirements of the OPW in relation to lands subject to Justification Test where a small portion of the lands are at risk of flooding, a new Policy Objective is proposed to be included by the Council whereby the lands at risk of flooding will be subject to the sequential approach to ensure first and foremost that new development is directed towards lands at low risk of flooding; and to restrict the type of development to that 'appropriate' to each flood zone in accordance with Tables 3.1 and 3.2 of the Flood Risk Management Guidelines.

On foot of the aforementioned new Policy Objective and the OPW submission, minor text changes will be made to the Updated SFRA published March 2021.

Within the Updated SFRA there are a number of instances where it states that no Justification Tests were carried out on lands already developed, as further development on said lands would represent minor proposals in accordance with Section 5.28 of the Guidelines. Within such areas development proposals will be assessed with reference to Section 5.28 of the Planning System and Flood Risk Management Guidelines in accordance with Policy Objectives IU 24-30 and any new flood related Policy Objectives. Further, highly vulnerable or less vulnerable land uses affected by Flood Zone A and B should employ the sequential approach when considering the site layout and a detailed SSFRA is to be submitted at development management stage.

Chief Executive's Recommendation:: MA Vol 5-5: Justification Tests

Insert a new Policy Objective IU XX:

IU XX: Where a portion of a site is at risk of flooding, the lands at risk will be subject to the sequential approach to ensure first and foremost that new development is directed towards lands at low risk of flooding; and to restrict the type of development to that 'appropriate' to each flood zone in accordance with Tables 3.1 and 3.2 of the Flood Risk Management Guidelines.

The following text changes will be made to Criteria 2 of the Justification Tests in the Settlements (where applicable) included in the Updated SFRA.

Replace 'compatible' with 'appropriate'

Development of the site will require a Site Specific FRA which should consider the Sequential Approach within the site, allocating vulnerable and less vulnerable development to Flood Zone C and only water compatible development (e.g. amenity open space, sports and recreations etc.) to Flood Zone A and B and to restrict the type of development to that 'appropriate' to each flood zone in accordance with Tables 3.1 and 3.2 of the Flood Risk Management Guidelines 2009.

Infill Lands:

Within areas of existing development, proposals for extensions and minor proposals development shall be assessed with reference to Section 5.28 of the Planning System and Flood Risk Management Guidelines, in accordance with Policies IU 24-IU XX of the LCDP.

MA Vol 5-5: Justification Tests in Specific Settlements

- **Ardee**

Sites 2, 3 and 6 are on the periphery of this settlement, the Justification Test does not satisfy this requirement. Louth County Council should consider rezoning the lands in Flood Zone A & B as a water compatible type zoning.

Chief Executive's Response: MA Vol 5-5: Ardee

In addition to the response below you are also referred to the response to 'Criteria 2' of the Justification Test in the preceding section.

The General Employment lands (referenced by the OPW) have a substantial planning history associated with same and extant planning permissions for development of the lands. These lands have to date incurred substantial costs in the provision of service infrastructure. This has included the provision of a roundabout on the adjoining N33 which services not only the employment lands but additionally the associated residential lands to the south, which are currently under construction. The development of these residential lands in close proximity to the employment lands will help deliver a sustainable pattern of development in this general location. There are no other substantial employment generating lands in Ardee to cater for and facilitate its development as a 'Self Sustaining Growth Town' and as a regionally important local driver providing jobs and services to cater for the resident population and the surrounding catchment area.

In addition, having regard to the overall land parcel at this location, the portion of lands subject to Flood Zones A and B are small and it is considered that flood risk mitigation measures could be designed to allow development of the wider site assist in mitigation and the sequential approach.

Site 3 has extant planning permissions and as part of the application process an Engineering Report and SSFRA accompanied the planning applications which satisfactorily addressed the issues of flooding associated with Captains Stream and which address Site 3 and by extension Site 2. As part of the review of the Ardee Local Area Plan there will be an opportunity to further examine the zoning of these lands.

Site 6: the majority of the lands at this location are identified as Flood Zone C and in relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is directed towards lands at low risk of flooding and in accordance with Tables 3.1 and 3.2 of the Guidelines.

This is further strengthened through the inclusion of the proposed New Policy Objective on foot of the OPW recommendation.

The Council also advises that it intends to review the Ardee Local Area Plan following the preparation of both the Drogheda and Dundalk Local Area Plans.

Chief Executive's Recommendation: MA Vol 5-5: Ardee

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Carlingford**

Carlingford has not been targeted for growth, it does not satisfy criteria 1 of the Justification Test. Louth County Council should consider rezoning the lands in Flood Zone A & B as a water compatible type zoning.

Site 2 in Carlingford has been zoned Tourism and Leisure (I1). It is noted that Chapter 13 of the Louth County Development Plan states that this zoning category allows for 'Highly Vulnerable' uses such as a hotel and B&B.

Chief Executive's Response: MA Vol 5-5: Carlingford

In addition to the response below you are also referred to the response to 'Criteria 1' of the Justification Test in the preceding section.

Regarding Site 2, the rezoning of these lands from Residential to Tourism and Leisure provides for uses which fall into the category of less vulnerable development and as such are considered appropriate in terms of lands affected by Flood Zone B.

Further such a zoning objective will aid in supporting and realising the development of Carlingford as a sustainable tourism hub, facilitating sustainable development that will create locally based employment opportunities and support the creation of vibrant communities. The natural constraints to development in Carlingford including the coast to the east and the surrounding mountainous, highly scenic and sensitive landscape to the north and west, limits opportunities for the development of lands in the vicinity of Carlingford for such purposes.

The Council considers that Site 2 lends itself to the provision of such a zoning objective given the potential for less vulnerable development on the substantive lands at risk of flooding. In relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is first and foremost directed towards lands at low risk of flooding and to restrict the type of development to that 'appropriate' to each flood zone in accordance with Tables 3.1 and 3.2 of the Flood Risk Management Guidelines.

Chief Executive's Recommendation: MA Vol 5-5: Carlingford

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Castlebellingham/Kilsaran**

As Castlebellingham/Kilsaran has not been targeted for growth, it does not satisfy criteria 1 of the Justification Test. Louth County Council should consider rezoning the lands in Flood Zone A & B as a water compatible type zoning.

Chief Executive Response: MA Vol 5-5: Castlebellingham/Kilsaran

In addition to the response below you are also referred to the response to 'Criteria 1' of the Justification Test in the preceding section.

As Castlebellingham/Kilsaran lies outside the scope of the CFRAM Study, the Preliminary Flood Risk Assessment has been used to indicate flood zones. As acknowledged by the OPW (in the submission to the Draft Plan) the PFRA was not a detailed assessment of flood risk, but rather a broad assessment based on available and readily derivable information to identify areas that may require further assessment. In accordance with Circular PL 2/2014 ...'(the PFRA maps) are not necessarily locally accurate and should not be used as the sole basis for defining Flood Zones or for making decisions on planning applications'. Lands identified in Site 1 are affected by Pluvial Flooding. The majority of lands in Site 2 are identified as Flood Zone C and in relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is directed towards lands at low risk of flooding and in accordance with Tables 3.1 and 3.2 of the Guidelines.

This is further strengthened through the inclusion of the proposed New Policy Objective on foot of the OPW recommendation.

It should also be noted that the lands contained within Site 2 is home to Bellingham Castle which is a Protected Structure and is located in an identified Historic Garden and Designed Landscape. Any future development on these lands would be subject to additional analysis, assessments and constraints including compliance with national heritage guidance in relation to same.

Chief Executive's Recommendation: MA Vol 5-5: Castlebellingham/Kilsaran

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Collon**

As Collon has not been targeted for growth, it does not satisfy criteria 1 of the Justification Test. Site 1 is on the periphery of this settlement, the Justification Test does not satisfy this requirement. Louth County Council should consider rezoning the lands in Flood Zone A & B as a water compatible type zoning.

Chief Executive Response: MA Vol 5-5: Collon

In addition to the response below you are also referred to the response to 'Criteria 1' of the Justification Test in the preceding section.

The overall parcel of lands which are zoned General Employment at this location have been substantially developed with the associated and necessary infrastructure in place to service these zoned lands. As Collon lies outside the scope of the CFRAM Study, the Preliminary Flood Risk Assessment has been used to indicate flood zones.

As acknowledged by the OPW (in the submission to the Draft Plan) the PFRA was not a detailed assessment of flood risk, but rather a broad assessment based on available and readily derivable information to identify areas that may require further assessment. In accordance with Circular PL 2/2014 ...'(the PFRA maps) are not necessarily locally accurate and should not be used as the sole basis for defining Flood Zones or for making decisions on planning applications'. Further, as the majority of the lands at this location are identified as Flood Zone C and in relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is directed towards lands at low risk of flooding and in accordance with Tables 3.1 and 3.2 of the Guidelines.

This is further strengthened through the inclusion of the proposed New Policy Objective on foot of the OPW recommendation.

Chief Executive's Recommendation: MA Vol 5-5: Collon

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Drogheda**

As sites 1 and 2 are on the periphery of this settlement, the Justification Test does not satisfy these requirements. It is noted that these lands have extant planning permission for the provision of residential development. Should the proposed development in the area not go ahead or planning lapses with no submission to renew it, then Louth County Council should consider zoning the flood risk lands as a water-compatible type zoning such as Open Space.

Chief Executive's Response: MA Vol 5-5: Drogheda

In addition to the response below you are also referred to the response to 'Criteria 2' of the Justification Test in the preceding section.

The lands in the Northern Environs have been subject to a detailed Masterplan for the comprehensive, sequential and sustainable development of the lands at this location and upon which there are substantial extant planning permissions.

With the exception of limited, small pockets of land within the traditional borough boundary, the Northern Environs represent the only lands within the jurisdiction of Louth County Council to meet the targeted growth of Drogheda as a Regional Growth Centre in accordance with the policy objectives of the NPF and the RSES. These lands as referenced on page 22 of this report are very centrally located relative to the traditional town centre and community and employment facilities. The development of the Masterplan lands will also serve to counterbalance the extensive residential development which has occurred to the south of the town in County Meath, thereby ensuring the town has the capacity to deliver the population and economic growth identified in both the NPF and the RSES and consolidate the towns growth as an identified Regional Growth Centre.

A substantial portion of the overall North Drogheda Environs lands including Sites 1 and 2 have extant planning permissions. Further, while Site 1 is extensive in area, a substantial portion of these lands have been zoned as Open Space in the Masterplan and identified as a Wetland Park (circa 6.8ha). In addition to this, there is a further area (approximately 15.8ha) which is identified as a Wetland Area (Reserved Attenuation Area) which encompasses a substantial remainder of the lands identified as vulnerable to flooding at this location.

The Master Plan specifies that this Wetland Area shall not be developed until a detailed flood analysis is completed over an extended period of time (at least 5 years) and that if the study finds that the area is necessary to be retained as part of the floodplain, then this Wetland Area will be added to the overall quantum of Open Space within the Masterplan lands. With reference to Site 2, this is less extensive in area with a portion of the lands zoned Open Space. The majority of the land vulnerable to fluvial flooding and outside the area of Open Space has an extant planning permission.

The Council also advises that it is its intention to commence preparation of the Drogheda Joint Local Area Plan within 6 months of adoption of the Louth County Development Plan where more detailed analysis of zoning objectives and extant permissions will be reviewed.

Chief Executive's Recommendation: MA Vol 5-5: Drogheda

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Dundalk**

As site 1 is on the periphery of this settlement, the Justification Test does not satisfy this requirement. Louth County Council should consider rezoning the lands in Flood Zone A & B as a water compatible type zoning.

It is set out in the SFRA that there is extant planning permission for site 4. As this site is on the periphery of the settlement it does not satisfy criteria 2 of the Justification Test. Should these planning permissions lapse with no submission to renew them, then Louth County Council should consider zoning the flood risk lands as a water-compatible type zoning such as Open Space.

As sites 20 and 21 are on the periphery of the settlement, they do not satisfy criteria 2 of the Justification Test.

In line with the Guidelines consideration should be given to avoid/substitute flood risk areas by zoning areas in Flood Zone A to a water-compatible zoning such as Open Space.

This will ensure the sequential approach is followed in the development management stage and not just allow development if mitigation measures are included.

Chief Executive's Response: MA Vol 5-5: Dundalk

In addition to the response below you are also referred to the response to 'Criteria 2' of the Justification Test in the preceding section.

Site 1: The Draft Plan promotes tourism as a key economic pillar of the County's economy and major generator of employment supporting the provision of a significant increase in facilities and visitor attractions. Dundalk and indeed the wider lands associated with Site 1 are currently home to Dundalk Stadium which is an all-weather horse and dog racing venue with associated activities including bars and restaurants. The identification of the lands associated with Site 1 for Tourism and Leisure purposes are considered to be an integral part of the overall built up area of the town, are well serviced by a good road network and will allow for and facilitate the consolidation of the existing tourism and leisure facilities at this location.

It will facilitate economic growth and further support the role of the Regional Growth Centre of Dundalk, recognising its strategic location and its capacity to function as a driver of regional growth in accordance with national and regional policy objectives. The Council considers that this Site lends itself to the provision of this zoning objective given the potential for less vulnerable development on the lands not at risk of flooding and water compatible development on the remaining lands. In relation to the area subject to flooding it is proposed that the Sequential Approach be applied in any SSFRA to ensure that development is first and foremost directed towards lands at low risk of flooding and to restrict the type of development to that 'appropriate' to each flood zone in accordance with Tables 3.1 and 3.2 of the Flood Risk Management Guidelines

With regards to Site 4 these lands are subject to an extant planning permission whereon development is currently ongoing on site.

The majority of the lands in Site 20 are identified as Flood Zone C and in relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is directed towards lands at low risk of flooding and in accordance with Tables 3.1 and 3.2 of the Guidelines. This is further strengthened through the inclusion of the proposed New Policy Objective on foot of the OPW recommendation.

With regards to Site 21, there is an extant SHD planning permission granted by An Bord Pleanála on these lands.

The Council also advises that it is its intention to commence preparation of the Dundalk Local Area Plan within 6 months of adoption of the Louth County Development Plan where more detailed analysis of zoning objectives and extant permissions will be reviewed.

Chief Executive's Recommendation: MA Vol 5-5: Dundalk

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Omeath**

As Omeath has not been targeted for growth, it does not satisfy criteria 1 of the Justification Test. Louth County Council should consider rezoning the lands in Flood Zone A & B as a water compatible type zoning.

Chief Executive Response: MA Vol 5-5: Omeath

In addition to the response below you are also referred to the response to 'Criteria 1' of the Justification Test in the preceding section.

As Omeath lies outside the scope of the CFRAM Study, the Preliminary Flood Risk Assessment has been used to indicate flood zones. As acknowledged by the OPW (in the submission to the Draft Plan) the PFRA was not a detailed assessment of flood risk, but rather a broad assessment based on available and readily derivable information to identify areas that may require further assessment. In accordance with Circular PL 2/2014 ...'(the PFRA maps) are not necessarily locally accurate and should not be used as the sole basis for defining Flood Zones or for making decisions on planning applications'. In relation to both Site 1 and Site 2 the majority of the lands at this location are identified as Flood Zone C and in relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is directed towards lands at low risk of flooding and in accordance with Tables 3.1 and 3.2 of the Guidelines.

This is further strengthened through the inclusion of the proposed New Policy Objective on foot of the OPW recommendation.

Chief Executive's Recommendation: MA Vol 5-5: Omeath

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Tallanstown**

As Tallanstown has not been targeted for growth, it does not satisfy criteria 1 of the Justification Test.

As the lands affected by Flood Zone A and B in site 1 are already developed, development should be restricted to infills and rebuilds as per objectives number IU25 and IU26.

Material alteration number L4-10 has resulted in the rezoning of a section of land almost entirely in Flood Zone A from H1 Open Space to A2 New Residential. As this zoning has the potential to introduce a significant number of additional people to flood risk areas, it is not consistent with the sequential approach as outlined in the Guidelines.

As site 3 is on the periphery of the settlement, it does not satisfy criteria 2 of the Justification Test. Louth County Council should consider rezoning the lands in Flood Zone A & B as a water compatible type zoning.

Chief Executive's Response: MA Vol 5-5: Tallanstown

In addition to the response below you are also referred to the response to 'Criteria 1' of the Justification Test in the preceding section.

MA L4-10: In the current Louth County Development Plan the lands are zoned as per the Material Alteration i.e. for both Residential development and Open Space.

As Tallanstown lies outside the scope of the CFRAM Study, the Preliminary Flood Risk Assessment has been used to indicate flood zones.

As acknowledged by the OPW (in the submission to the Draft Plan) the PFRA is not a detailed assessment of flood risk, but rather a broad assessment based on available and readily derivable information to identify areas that may require further assessment. In accordance with Circular PL 2/2014 ...'(the PFRA maps) are not necessarily locally accurate and should not be used as the sole basis for defining Flood Zones or for making decisions on planning applications'.

In addition, the lands to which this site pertains are included in Flood Info mapping. As part of a 2019 planning application a Site Specific Flood Risk Assessment was completed which demonstrated that the site passed the Justification Test and provides compensating storage for loss of area due to raising building levels.

Site 1 relates to town centre lands which are already developed. Development at this location will support the consolidation of the town centre ensuring compact, localised and balanced sustainable growth, supporting vibrant communities and facilitating the development of underutilised lands. As such, any development proposed thereon will be in accordance with Section 5.28 of the Guidelines in relation to minor proposals in areas of flood risk and with Policy Objectives IU 24-30 and any new flooding related Policy Objectives.

With regard to Site 3, the majority of the lands at this location are identified as Flood Zone C and in relation to the area subject to flooding it is proposed that the Sequential Approach be applied in the SSFRA to ensure that development is directed towards lands at low risk of flooding and in accordance with Tables 3.1 and 3.2 of the Guidelines.

This is further strengthened through the inclusion of the proposed New Policy Objective on foot of the OPW recommendation.

Chief Executive's Recommendation: MA Vol 5-5: Tallanstown

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Termonfeckin**

As Termonfeckin has not been targeted for growth, it does not satisfy criteria 1 of the Justification Test. As the lands affected by Flood Zone A & B are already developed, development should be restricted to infills and rebuilds as per objectives number IU25 and IU26.

Chief Executive's Response: MA Vol 5-5: Termonfeckin

In addition to the response below you are also referred to the response to 'Criteria 1' of the Justification Test in the preceding section.

Of the two sites in Termonfeckin, Site 1 has resulted in Residential lands being rezoned for Open Space while Site 2 relates to town centre lands which are already developed. Development at this location will support the consolidation of the town centre ensuring compact, localised and balanced sustainable growth, supporting vibrant communities and facilitating the development of underutilised lands. As such, any development proposed therein will be in accordance with Section 5.28 of the Guidelines in relation to minor proposals in areas of flood risk and with Policy Objectives IU 24-30 and any new flooding related Policy Objectives.

Chief Executive's Recommendation: MA Vol 5-5: Termonfeckin

No Change

MA Vol 5-5: Justification Tests in Specific Settlements

- **Tullyallen**

As Tullyallen has not been targeted for growth, it does not satisfy criteria 1 of the Justification Test. As the lands affected by Flood Zone A & B are already developed, development should be restricted to infills and rebuilds as per objectives number IU25 and IU26.

Chief Executive's Response: MA Vol 5-5: Tullyallen

In addition to the response below you are also referred to the response to 'Criteria 1' of the Justification Test in the preceding section.

Site 2 relates to town centre lands which are already developed. Development at this location will support the consolidation of the town centre ensuring compact, localised and balanced sustainable growth, supporting vibrant communities and facilitating the development of underutilised lands. As such, any development proposed therein will be in accordance Section 5.28 of the Guidelines in relation to minor proposals in areas of flood risk and with Policy Objectives IU 24-30 and any new flooding related Policy Objectives.

Chief Executive's Recommendation: MA Vol 5-5: Tullyallen

No Change

Submission No.

LCDP MA021

Submitted by:

Transport Infrastructure Ireland (TII)

Summary of Submission:

TII welcomes the proposed Material Alterations arising from consideration of the Authority's initial submission on the Draft Plan and has the following observations to make on other Material Alterations:

1. Material Alterations 44 and 46

In the interests of clarification and as an advisory to potential applicants for development in rural areas, supporting text should be included regarding the policy provisions for access to national roads as it relates to rural housing. This text could be similar to that included in Material Alterations no. 62, 192, 204, and 205.

Chief Executive's Response: Material Alterations 44 and 46

In Chapter 13 of the Draft Plan 'Development Management Guidelines' there is a specific section providing guidance on housing in the open countryside. Within this section there is a sub-section on 'Access' (section 13.9.51). This sub-section includes a reference to the National and Protected Regional Roads. In the interests of clarity additional text will be provided in this section.

Chief Executive's Recommendation: Material Alterations 44 and 46

Insert the following additional text into section 13.9.51 as follows:

13.9.51 Access

When designing an access for a rural dwelling the following factors shall be taken into account:

- The road network serving the site shall be capable and of a suitable quality to accommodate the additional access and traffic that would be attracted to the site.
- Applications must demonstrate that a safe access and egress to and from the site on to the public road can be achieved. The design of accesses including required visibility standards for new entrances is set out in the Development Management Standards for Roads (Section 13.14.5.13.13.5). ~~A list of National and Protected Regional roads where no new accesses or intensification of existing accesses are permitted is set out in Table 7.5 and 7.6 of the Movement Chapter.~~
- There are restrictions on accesses to National and Protected Regional Roads in order to maintain the efficiency and functionality of the National and Regional Road Network. Further details on these restrictions and exemptions are set out in Table 7.5 and 7.6 of the Movement Chapter. Section 13.14.5.1 in the Development Management Guidelines Chapter provides further details regarding accesses onto National and Regional Roads.

2. Material Alteration 96

There are concerns regarding the proposed policy objective relating to development at urban related interchanges. The existing and proposed zonings in the Draft Plan have not been examined, reviewed nor undertaken in accordance with the requirements of Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012).

Existing zonings in the vicinity of Dundalk South interchange (Junction 16) and Drogheda North (Junction 10) are based on masterplans prepared before 2012 and require redrafting to reflect the changes not only with respect to national transport policy but also the many other statutory sustainable development requirements in the last 13 years.

In addition, the rezoning extension proposal under Masterplan 7 and Material Alteration no. DLK8, has been put forward in the absence of an evidence base required in Section 2.7 Development at National Road Interchanges or Junctions of Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012) nor the requirements Section 8.3 ‘Working Together for Economic Advantage’ of *protecting the key transport corridors such as the TEN-T network and strategic function of the Dublin to Belfast road network from unnecessary development and sprawl*”.

TII therefore recommends that Material Alteration no 96 is amended as follows:

“To promote and facilitate development at urban–related* interchanges in accordance with the zoning provisions for Drogheda and Dundalk as set out on the zoning maps for Drogheda and Dundalk in the Draft County Development Plan and any subsequent Local Area Plans adopted for these settlements with the requirements of *Section 2.7 Development at National Road Interchanges or Junctions of Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012).*”

Chief Executive’s Response: Material Alterations 96

This issue is addressed in response to MA Recommendation 8 of the OPR submission – Development at national roads interchanges or junctions. The response to MA Recommendation 3 of the OPR submission – Local Area Plans addresses the issues raised regarding zoning and Master Plans.

Chief Executive’s Recommendation: Material Alterations 96

Insert the following additional text into Material Alteration 96:

MOV XX To promote and facilitate development at urban–related* interchanges in accordance with the zoning provisions for Drogheda and Dundalk as set out on the zoning maps for Drogheda and Dundalk in the Draft County Development Plan and any subsequent Local Area Plans adopted for these settlements. Any large scale development proposal in proximity to these interchanges will be required to prepare a Traffic and Transport Assessment in accordance with the requirements of the 2014 Transport and Traffic Assessment Guidelines.

Note this is the same recommendation as that in response to MA Recommendation 8 of the OPR Submission.

3. Material Alteration 90

TII would welcome consultation on the preparation of the Local Transport Plans where there may be implications for the strategic national road network in the area.

The Spatial Planning and National Roads Guidelines are explicit in requiring that where a development plan or local area plan proposes development to take place on zoned lands adjacent to national roads the planning authority must prepare its plans in such a way that demonstrates that such roads can continue to perform their strategic transport function into the future.

The proposed amendment to policy objective MOV 4 should include a reference to TII.

Chief Executive's Response: Material Alteration 90

The Council will engage with the TII and all other relevant stakeholders as part of the preparation of the Local Transport Plans for Drogheda and Dundalk. There is no objection to inserting additional text into policy objective MOV 4 to include a reference to Transport Infrastructure Ireland.

Chief Executive's Recommendation: Material Alteration 90

Amendment to Policy Objective MOV 4

To prepare a Local Transport Plan in consultation with the National Transport Authority, [Transport Infrastructure Ireland](#) and other relevant stakeholders for Dundalk and Drogheda as part of the preparation of the Urban Area Plans / Local Area Plans for these settlements. ~~These~~ The preparation of these plans will be based on the guidance note on Area Based Transport Assessments published by the NTA/TII in 2019 and these plans will be subject to screening for SEA and AA and full assessments will be undertaken if appropriate.

4. Material Alterations DLK 8, 174, Proposed Master Plan 7, New Spot Objective 3

It is proposed to zone additional lands in proximity to M1 Dundalk South interchange (Junction 16) to E2 Business and Technology with a New Spot Objective 3 also to be inserted on these lands.

It is unclear if this zoning proposal has been subject to appropriate transport assessment including appropriate transport modelling or the development of appropriate mitigation measures taken in conjunction with lands covered by the Mullagharlin Framework Plan. These Material Alterations are not supported by the required evidence base and plan-led approach required by Section 28 Ministerial Guidelines on Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and should be omitted due to prematurity.

Chief Executive's Response: Material Alteration DLK 8, 174, Proposed Master Plan 7, New Spot Objective 3

The lands associated with proposed Material Alteration 174 are zoned 'Residential 2' in the Dundalk and Environs Plan 2009-2015. Having regard to the excess of residential lands available in Dundalk it was proposed to place these lands in a 'Strategic Reserve' in the Draft Plan.

The proposal to identify additional lands for 'Business and Technology' uses in this location was taken in the context of ongoing development in the Mullagharlin area, whereby a significant proportion of the E2 'Business and Technology' zoned lands and in particular those lands to the south of the Southern Link Road have been built out or are under construction. It is considered prudent to identify additional lands in order to ensure there are sufficient lands available for employment/economic development uses in Dundalk that will enable the town to continue to facilitate and attract economic investment to the town and enable the town to function and operate as a Regional Growth Centre, as designated in national and regional policy.

The lands identified under DLK 8 are considered to form a natural extension to the existing employment lands available in the Mullagharlin area. Any development of scale on these lands would be likely to require the preparation of a Traffic and Transport Assessment, which will assess the potential impact on the motorway interchange. In addition, as part of the preparation of the Local Transport Plan for Dundalk the Council will be engaging with relevant stakeholders, including the TII to identify the transport demand within the Plan area and how this can be managed.

Chief Executive's Recommendation: Material Alterations DLK 8, 174, Proposed Master Plan 7, New Spot Objective 3

No Change

5. Material Alteration 179

This refers to the insertion of a Spot Objective on lands zoned 'Mixed Use' in the Mullagharlin Framework Plan Area. This Material Alteration is not supported by the required evidence base and plan-led approach required by Section 28 Ministerial Guidelines on Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and should be omitted in its current form due to potential to undermine critical international connectivity and regional accessibility under NSO 2 and 6 of the National Planning Framework and as the existing non-statutory Master Plan is out of date.

Chief Executive's Response: Material Alteration 179

The wording of this Spot Objective is as follows:

"To provide for a mixture of higher order business uses supported by cafes/restaurants, community facilities, office, health care, residential, and business units. Individual shops in excess of 350m² gross floorspace or warehousing and distribution will not be considered appropriate."

The intention of the insertion of the above Spot Objective onto the Mixed Used lands south of DkIT is to provide clarity as to the nature of uses that can be facilitated on these lands, and in particular the scale of retail development.

It should be noted these lands are currently zoned 'Employment Mixed Use' in the Dundalk and Environs Development Plan 2009-2015 and there is an extant permission on part of these lands for 142 apartments which were granted as a Strategic Housing Development.

Chief Executive's Recommendation: Material Alteration 179

No Change

6. Master Plans

TII notes that Section 13.5 of the Draft Plan refers to a number of Master Plans located in proximity to the national roads network which were prepared over 10 years ago prior to the publication of the National Planning Framework, Section 28 Ministerial Guidelines relating to Spatial Planning and National Roads Guidelines.

TII is of the opinion that these Master Plans do not reflect the changing circumstances and policies which have occurred in the intervening period. In addition, it is considered that these existing Master Plans could materially impact national roads.

The Spatial Planning and National Roads Guidelines for Planning Authorities require that development should be Plan-led, as outlined above. The promotion of developer led master plan exercises without consultation and liaison by the local authority with TII (and the NTA) and in the absence of strategic transport evidence base requirements is wholly inappropriate and leads to substantial risks for future development.

The DoECLG Guidelines require that planning authorities must also ensure that they consult with the NRA (now TII) in preparing any local area plans or other non-statutory plans where there may be material implications for national roads.

The Authority requests that this issue is reviewed again to clearly address the deficiencies in consultation, liaison and evidence base requirements and also the requirements for the preparation of Local Transport Plans, Local Area Plans and joint Urban Area Plan (UAP) / Local Area Plan (LAP) objectives for Drogheda.

Chief Executive's Response: Material Alteration Master Plans

It should be noted that the Council are constrained as to what it can consider at this stage of the process in that any further modifications must be made to a proposed material alteration. Taking account of the fact that the proposed material alterations placed on public display did not include any amendments relating to the issue of Master Plans the Council is precluded from addressing the concerns raised. Nonetheless, it is considered appropriate to respond to the issues raised.

TII will be aware that the Master Plan areas referenced in the submission have been zoned for a considerable period of time with construction at various stages of development within these Master Plan areas ranging from an extant permission yet to commence, construction ongoing, to development complete and operational.

The purpose of these Master Plans are to provide a more detailed and co-ordinated framework for the development of the lands that will assist in the Development Management process.

In the interests of continuity it is considered appropriate to reference these Master Plans in the Draft Plan. As part of the preparation of the Local Area Plans there will be an opportunity to review these Master Plans and if it is considered necessary they can be updated as required.

Chief Executive's Recommendation: Material Alteration Master Plans

No Change

7. Other Issues

TII has previously advised that Design Manual for Roads and Bridges (DMRB) has been subsumed into TII publications. It is recommended that the development plan text is checked to ensure that this matter has been dealt with consistently throughout the text.

Associated with the delivery of national road improvements is the requirement to adhere to relevant environmental regulations, including Appropriate Assessment. It is acknowledged that the Draft Plan addresses this requirement. TII would welcome consideration by the Council to ensure the consistency in the future Development Plan with the requirements of Article 6(3) and Article 6(4) of the Habitats Directive.

Chief Executive's Response: Other Issues

This has been addressed under Material Alteration 75.

Chief Recommendations Recommendation: Other Issues

No Change

Submission No.

LCDP MA004

Submitted by:

Irish Water

Summary of Submission:

The Council notes the comments from Irish Water. Irish Water welcomes the published Material Alterations incorporating observations and edits proposed to the Draft plan with particular reference to the addition of two new policy objectives relating to Drinking Water and SUD's.

There are no further observations.

Chief Executive's Response

Noted

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA058

Submitted by:

DAU, Dept. of Housing, Local Government and Heritage

Summary of Submission:

The Department notes, and welcomes, that the Proposed Material Alterations 23, 25, 73 and Volume 5-4 incorporate modifications to the wording of the Draft County Development Plan suggested by the Department and as recommended in the Louth County Council Chief Executive’s Report on Submissions to the Draft Louth County Development Plan 2021-2027.

The Department accepts the conclusion of the Natura Impact Report (NIR) in relation Material Alteration 25 and 23.

The Department regrets that recommendations in relation to Sections 1.2.1 and 1.2.2 of the rich wildlife habitats and large populations of wintering water birds occurring in the Boyne Estuary and Dundalk Bay, respectively close to Drogheda and Dundalk, were not accepted. In the Chief Executive’s report on submissions concerning the CDP it is stated that this is because these sections comprise very general overviews of the two Regional Growth Centres reflective of the general Regional Spatial and Economic Strategy (RSES) structure. However in the context of the recent increased appreciation of the natural world the Department urges that space should still be found in these introductory sections to highlight the natural heritage resources available on the doorsteps of the two towns for both tourism and the local community.

With regards to this Department’s original comments on references to the Louth Coastal Way and the Great Eastern Greenway in Chapter 7 Movement of the CDP, the Department still considers it a significant weakness of the CDP that no indicative route corridors for these greenway projects are included on any of the maps included in this document.

In this Department’s original submission on the Draft CDP it was pointed out that the statement in Section 12.7.3 of this document that “The Council recognizes the important role green infrastructure such as greenways play in climate mitigation and adaptation” confuses greenways with green infrastructure. The response in the Chief Executive’s report that “Section 12.7.3 acknowledges that Greenways represent one aspect of Green Infrastructure and therefore no change is required” reinforces this Department’s point. The usage here is incorrect, has been avoided elsewhere in the CDP, and is potentially a source of confusion to the public. It is recommended that the words “such as greenways” should be dropped from Section 12.7.3.

Chief Executive’s Response

The comments in relation to the NIR are welcomed and noted.

The Council remains of the opinion that it is neither necessary nor appropriate to include reference to the rich wildlife habitats and wintering water birds occurring in the Boyne estuary and Dundalk Bay specifically in Sections 1.2.1 and 1.2.2 respectively.

This is due to the fact that this section of the Plan is a strategic and general overview of the two Regional Growth Centres and aligns with the Regional Policy Objectives as contained and reflected in EMRA's Regional Spatial and Economic Strategy. Furthermore, Chapter 8 of the Draft Plan specifically addresses Natural Heritage, Green Infrastructure and Biodiversity.

The Council remains of the opinion that mapping the Greenways/Coastal ways would be premature at this juncture as there are no details available with regard to these routes. However, the Council assures that both the design and development of the Greenways will be subject to the required environmental assessments which will consider potential impacts on European Sites.

Interchanging use in Section 12.7.3 of terminology regarding Green Infrastructure and Greenways and the potential to cause public confusion is accepted by the Council. Consequently, for the purposes of clarity and to remove potential confusion, the text has been subdivided and placed under two disparate headings, namely 'Green Infrastructure' and 'Greenways'.

Chief Executive's Recommendation:

This Recommendation will introduce a new Section Heading 12.7.3.3 – Greenways. Existing ~~striketrough~~ text will be removed from Section 12.7.3.2 and inserted into 12.7.3.3. No additional text will be introduced or deleted under this recommendation.

12.7.3.2 Green Infrastructure

Green infrastructure has a significant role to play in transitioning to a low-carbon society and economy and to mitigate the significant risks associated with rising energy costs and climate change adaptation. Green Infrastructure can include a number of facets such as uplands, wetlands, woodlands, rivers, lakes, and coastal areas, all of which have a pivotal role in terms of climate adaptation.

The Council has in place a comprehensive Green Infrastructure Strategy, which aims to strengthen and/or create wildlife corridors between interconnecting core areas for the benefit of biodiversity, enhanced outdoor recreational opportunities, visual amenity and general wellbeing.

~~Greenways represent one aspect of Green Infrastructure, in which the Council has invested significantly. The Great Eastern Greenway is a 7 kilometre trail that runs from Carlingford to Omeath along the southern shore of Carlingford Lough. It is proposed to further extend this greenway to Newry and Dundalk and increase the length of the trail to approximately 55 kilometres.~~

~~To the south of the County phase one of the Boyne Greenway, in Drogheda, has been completed. This stretch of greenway runs from Dominic's Park on the south bank of the River Boyne to the Battle of the Boyne Visitor Centre at Oldbridge. Future phases of this Greenway include an extension from Drogheda to Mornington. It is anticipated that the extended route will pass through Drogheda and follow the southern edge of the Boyne east of the town and out to Mornington.~~

~~Most recently, Louth County Council has secured €200,000 worth of funding to improve the Northside Greenway at Mell in Drogheda. The funding has been allocated under the Outdoor Recreation Infrastructure Scheme, a joint initiative between the Department of Rural and Community Development and Fáilte Ireland.~~

The principles of a green infrastructure approach to land use planning has been embedded as a cross cutting theme in the policies and objectives of this Draft Development Plan. The Draft Plan supports the existing green infrastructure network of County Louth and includes a noteworthy policy to prepare specific Green Infrastructure Strategies for the Regional Growth Centres of Dundalk and Drogheda.

12.7.3.3 Greenways

The Council has invested significantly in Greenways. The Great Eastern Greenway is a 7 km trail that runs from Carlingford to Omeath along the southern shore of Carlingford Lough. It is proposed to further extend this greenway to Newry and Dundalk and increase the length of the trail to approximately 55 kilometres.

To the south of the County phase one of the Boyne Greenway, in Drogheda, has been completed. This stretch of greenway runs from Dominic's Park on the south bank of the River Boyne to the Battle of the Boyne Visitor Centre at Oldbridge. Future phases of this Greenway include an extension from Drogheda to Mornington. It is anticipated that the extended route will pass through Drogheda and follow the southern edge of the Boyne east of the town and out to Mornington.

Most recently, Louth County Council has secured €200,000 worth of funding to improve the Northside Greenway at Mell in Drogheda. The funding has been allocated under the Outdoor Recreation Infrastructure Scheme, a joint initiative between the Department of Rural and Community Development and Fáilte Ireland.

Submission No.

LCDP MA061

Submitted by:

Department of Education

Summary of Submission:

The Department of Education wishes to acknowledge these amendments and notes the proposed adjustment to projected population figures in Table 2.8 of Section 2.5.3 as outlined in amendment 11. The Department welcomes amendment 50 relating to the provision of additional school sites in both Drogheda and Dundalk and looks forward to working with the Council in respect of their identification and reservation during the preparation phases of both the Drogheda Joint LAP and the Dundalk LAP. The inclusion of the two new policy objectives as outlined in amendments 54 and 55 are also welcome.

Chief Executive's Response

Noted

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA005

Submitted by:

Environmental Protection Agency (EPA)

Summary of Submission:

This submission provides a brief outline of the role and function of the EPA as an environmental authority and its approach to land use plans.

- Section 8.6 *Detailed Evaluation* is noted and where SEA has identified alterations as having significant likely environmental effects/conflict with national environmental or planning policy, clear justification should be provided to proceed with these alterations;
- Prior to adoption the Plan should integrate recommendations of the SEA;
- Alterations should be in accordance with the need for proper planning and sustainable development, consistent with higher level plans and programmes and align with national commitments on climate change mitigation and adaptation;
- Further changes to the Draft Plan should be screened for likely significant effects in accordance with the SEA Regulations;
- Upon adoption of the Plan, a SEA Statement must be prepared and sent to environmental authorities consulted during the process;
- Outlines the Environmental Authorities to be consulted as per SEA Regulations.

Chief Executive's Response:

The cited guidance will be taken into account in preparing the SEA Statement.

The environmental authorities cited in the submission are being consulted with as part of the SEA/Plan preparation process.

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA054

Submitted by:

Meath County Council

Summary of Submission:

Meath County Council welcomes the publication of amendments to the Draft Louth County Development Plan 2021-2027.

Meath County Council reiterates its commitment to the preparation of the Joint Urban Area Plan for the Regional Growth Centre of Drogheda in accordance with the requirement of objective RPO 4.11 of the RSES. Meath County Council also acknowledge and recognise the commitment to develop strategic infrastructure in Drogheda throughout the plan period.

Alteration no. 76 includes the insertion of a body text in relation to the preparation of a Local Transport Plan for Drogheda and this is very much welcomed. However, in Amendment No. 2 to the Draft Meath CDP, we are proposing to include a similar new objective in the Drogheda written statement. STH DRO OBJ XX: To support the preparation of a Local Transport Plan for Drogheda, in conjunction with Louth County Council and in consultation with the National Transport Authority and other relevant stakeholders. Meath County Council respectfully suggests that the wording in alteration no. 76 to the Louth CDP is amended to include 'in conjunction with Meath County Council'.

Meath County Council welcome the inclusion of additional Text to Policy Objective SS 18, the rewording of TOU 10 and the additional text proposed to align rural housing policy in respect of the World Heritage site.

Chief Executive's Response

Support for the Material Alterations proposed to the Draft Plan are noted and welcomed. There are no objections to the inclusion of the proposed wording 'in conjunction with Meath County Council' in Material Alteration No. 76.

Chief Executive's Recommendation:

Inclusion of additional wording in Section 7.4 (Material Alteration No.76) as follows:

- i) The preparation of the Local Transport Plans for the larger settlements of Drogheda (**in conjunction with Meath County Council**) and Dundalk, which will seek to improve the integration of land use and transportation.

Submission No.

LCDP MA056

Submitted by:

ESB

Summary of Submission:

ESB welcome the proposed amendments that aim to reinforce climate change policies and wish to highlight opportunities to further strengthen the final plan, as a result of advancements in renewable technologies. The submission welcomes various proposed alterations.

ESB acknowledge the proposed re-wording of Policy Objective IU 70 and the insertion of new Policy Objective 156 that includes the introduction of the phrase “where possible and appropriate”. However, we wish to highlight that, Government policy recognises that public acceptability is required for the delivery of key networks projects and that to achieve public confidence project proposals must adhere to the highest international standards of safety, health and environmental and visual impact, and technology choice. The Government affirms that ESB Networks are obligated to adhere to all relevant guidelines and standards and they act in the national interest, and on behalf of all electricity consumers.

We request that due consideration is given to the issues raised in this submission, most particularly;

- The final Plan should maintain the planning policies which protect the County’s future capacity for the development of energy infrastructure whilst encouraging the sustainable development of renewable energy resources.
- We welcome the commitment to produce a Wind Energy Strategy for the County within one year of adoption of the revised Wind Energy Guidelines.
- Repowering can grant a new lease of life to existing windfarms. This entails extending the planning lifetime of existing windfarm with no or minimal new development. We welcome the insertion of a Policy Objective to support the repowering/life extension of wind turbines.

Chief Executive’s Response:

Noted

Chief Executive’s Recommendation:

No Change

Summary of Submission:

We are pleased to note that transboundary considerations continue to be included within the draft Development Plan and accompanying environmental reports. We are content that due consideration has been given to the natural and wider environment of Northern Ireland. We do not have any additional comments to make.

We would ask that the maps provided in the Environmental Report be reconsidered in a transboundary context.

The attributes of the shading in the northern parts of Carlingford Lough and adjoining sea area suggest that perhaps some relevant information has not been included.

Figures 1.1 and 1.20 shows the Environmental Sensitivity on a scale of 0-100 but it can be seen that Carlingford Lough SPA (UK9020161) has been assessed as at least 20 points less sensitive than Carlingford Lough SPA (004078) and it is not clear why such a large difference should exist.

Figure 4.2 should perhaps include the Carlingford Lough Area of Special Scientific Interest (ASSI), Ramsar site and the proposed Marine Protected Area (MPA) in Rostrevor Bay.

Figure 4.6 should perhaps include the shellfish areas in Rostrevor Bay and Mill Bay. The inclusion of shading for these maps for the transboundary shared waters area is welcomed, however we would request that the information used be checked to ensure all relevant information for that sea area has been included.

We welcome the inclusion of the UK Marine Policy statement within Appendix I but also suggest the inclusion of the draft Marine Plan for Northern Ireland as this, along with the UK Marine Policy Statement documents provide the policy framework for both planning and marine licensing authorities in making their decisions.

It is suggested that under in the SEA Environmental Report under Section 4.6 Biodiversity and Flora and Fauna where reference is made to relevant ecological designations in Northern Ireland this should include Marine Conservation Zones. Under 4.6.2 European Sites, again for Northern Ireland this should include Carlingford Lough proposed marine extension SPA – any map showing the Carlingford Lough SPA should be amended to show the marine extension as well as Carlingford Lough MCZ.

Chief Executive's Response:

The issues raised in the submission do not relate to a Material Alteration of the Draft Plan. Therefore in accordance with Section 12(7)(ad)(ii) this submission cannot be considered.

Notwithstanding this, it is noted that the differences in shading in Carlingford Lough arises from the absence of a number of environmental factors in the northern parts of the Lough – nationally (Ireland) designated Shellfish Areas and the national (Ireland) Proposed Natural Heritage Area.

The SEA will examine the availability of GIS layers for the identified factors and seek to include mapping and/or reference in the final report.

The final SEA Environmental Report will reference the draft Marine Plan for Northern Ireland (at Appendix I) and Marine Conservation Zones in Northern Ireland (in Section 4.6).

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA001

Submitted by:

Geological Survey of Ireland

Summary of Submission:

The GSI advises consulting its website and using the various data sets available when conducting the EIAR, SEA planning and scoping processes. Regarding Chapter 11 the GSI welcomes the inclusion of County Geological Sites (CGSs) in Policy Objective ENV 44.

Chief Executive's Response:

Noted

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA063

Submitted by:

Wind Energy Ireland (WEI)

Summary of Submission:

WEI support Louth County Council's Strategic Objective No's 4, 5 and 14 and text within Section 5.19.2.

WEI would question Material Alteration No. 137 which sees the omission of text which highlights various targets as set out in the National Renewable Energy Action Plan (NREAP) and the National Energy Efficiency Action Plan (NEEAP). While 2020 has passed, maybe more relevant figures ought to be included. While Material Alteration No. 138 goes on to identify national targets such as: 'To achieve the target of 70% renewable electricity by 2030', there is a lack of County specific targets for Louth addressed here.

WEI commends Louth on the good intentions, and on Material Alteration No. 147 which states the RES will be prepared within 1 year of the adoption of the Revised Wind Energy Guidelines. WEI would request that Louth provide a specific date should the Revised Wind Energy Guidelines continue to be delayed.

WEI would like Louth County Council to provide specific dates on the production of the RES and within that most importantly of all that specific targets ought to be set out for Louth in terms of their contributions to producing renewable energy.

Chief Executive's Response:

Support for the Material Alterations proposed is noted and welcomed by Louth County Council. Inclusion of specific targets for County Louth regarding contributions to renewable energy is dependent on the production of the proposed Renewable Energy Strategy (RES) the timeline of which is ear marked for delivery within one year of adoption of the revised Wind Energy Guidelines. The RES will establish baseline data and set out the renewable energy resource targets for the County to 2027, seeking a sustainable balance of renewable energy sources.

You are also referred to OPR MA Recommendation 9 which relates to renewable energy.

Chief Executive's Recommendation:

No Change

Section 4 (ii)

Chief Executive's Summary, Response and Recommendation on Zoning Submissions

Section 4 (ii)

Chief Executive's
Summary, Response
and Recommendation
on Zoning Submissions
Dundalk

Submission No.

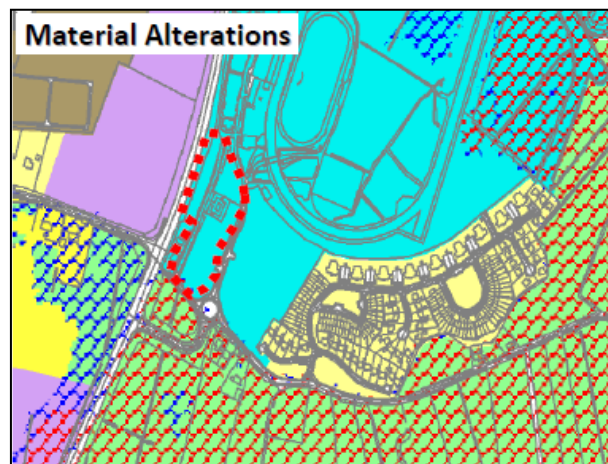
LCDP MA002

Submitted by:

Dundalk Stadium Company

Summary of Submission:

The Draft Plan contained an objective by way of an appropriate zoning for the provision of a Retirement Village at Dundalk Stadium. The OPR submission (Recommendation 5(ii)) advised its removal due to the isolated nature of the site. In response, the CE Report recommended that the land use revert to Tourism and Leisure which conflicts with the resolution of the Elected Members in the Draft Plan. The acceptance by the Elected Members of this recommendation due to isolation and lack of services is noted.



In support:

- The site is within the urban area, neither isolated nor a considerable distance from supporting services, abuts lands in residential use and offers a housing project for the ageing which is an urgent community requirement;
- A retirement village is needed in Dundalk, will contribute to housing need of the aged, alleviate overcrowding in family homes, provide independent living, allow downsizing and release housing units;
- Zoning as Tourism and Leisure is of no value to Dundalk Stadium as it is surplus to requirements. The feasibility report outlines the attributes of the site;
- Considers that the Elected Members were given incorrect advice by an agency, may not have been informed in relation to site availability and requests the rezoning of lands as per the Draft Plan;
- Company engaged with the OPR (and advises copy of letter enclosed) wherein the company advised of matters pertaining to the site (note: letter not enclosed);
- Having regard to the letter to the OPR, this submission and the purpose of the objective, there are grounds for the Elected Members to revisit the decision to remove the zoning objective and to reverse the decision.

A Condition Survey Report conducted in 2013 was submitted alongside the Submission.

A Feasibility Report accompanied the Submission: Herein, it was noted that there were 3 objections in relation to the zoning of lands to accommodate a Retirement Village. These were from the OPR, SEA Environmental Report and EMRA. The CE Report in response advised that the lands were isolated, at a considerable distance from supporting services or facilities. In response the following was outlined in support of the Retirement Village at this location:

- Historical relationship of stadium with Dundalk town, served by footpaths and 1.1km walk to shops;
- Scale of Ath Lethan development is beside the proposed Retirement Village: 200 houses in well maintained community. No public bus, but retirement village would add to critical mass;
- Relationship of proposed Retirement Village to existing amenities of Stadium: Restaurants and bars available as well as racetrack. There is a health and wellbeing facility alongside extensive parking and persons can avail of the inner racecourse for walks when not in use;
- Plan to fully refurbish Stables Block and include market, recreation centre, gym, medical suite etc. Employ best practice conservation with this as the centre piece and used for variety of uses as proposed.
- Existing full provision of sewer and water supply: Impact of village would be minimal on the capacity of the public services;
- Sensitive Design of proposed Retirement Village: 40 no. 1 and 2 bed single storey terraced houses centred on landscaped car parking, gardens and the refurbished Stables block.
- Offers independent living for ageing population within a likeminded community. It's an alternative to nursing homes and proposes to be net-zero carbon retirement village.

Chief Executive's Response

The approach taken in the Draft Plan is to ensure that the urban core is consolidated and that Dundalk's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period. The Draft Plan also places a strong emphasis on encouraging infill opportunities and better use of underutilised lands.

The Council remains of the opinion that the lands are isolated and are a considerable distance from any supporting services or facilities to support the provision of a retirement village and as such will not contribute to compact growth nor the consolidation of the urban core.

It is therefore considered appropriate that the lands remain zoned as 'Tourism and Leisure' which reflects the zoning of the adjacent lands. It should be noted that no evidence has been submitted showing the companies engagement with the OPR.

Chief Executive's Recommendation:

No Change

Submission No.

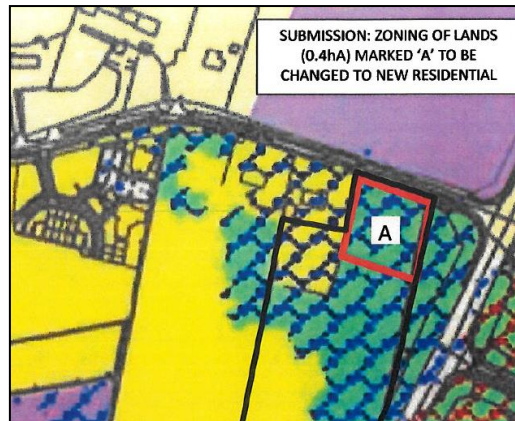
LCDP MA038

Submitted by:

Mr. Fred O'Hagan, Lisa O'Hagan Mernagh and Orlaith O'Hagan

Summary of Submission:

The submission requests that lands marked A below are changed from Open Space to A2 New Residential Phase 1.



In support;

- Rezoning is for the purpose of allowing family members build a house close to family and care for ageing parents.
- Located within the core settlement of Dundalk and would support sustained and compact growth.
- The small size, location and frequency of flooding to which the site may be subject to would allow for a New Residential zoning.
- A supporting 'Sample Site Specific FRA' has been submitted which demonstrates that a house 'will avoid significant risks of flooding and not exacerbate flooding elsewhere' and would pass the Justification Test for Development Management.

Chief Executive's Response:

The submission lands were zoned as 'Strategic Reserve' in the Draft Louth County Development Plan 2021-2027.

In response to the Office of Public Works (OPW) submission to the Draft Plan, all mapping of zoned land within each of the settlements has been assessed in line with the sequential approach and subject to justification tests as per the requirements of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities'.

In this instance the lands were vulnerable to coastal flooding and in Flood Zone B. It was recommended that the lands were re-zoned to 'Open Space'. The submission requests that the lands are re-zoned from Strategic Reserve to A2 New Residential Phase 1.

Having regard to the fact that these lands are located in a flood zone and are vulnerable to flooding a residential zoning is not considered appropriate and would be contrary to the provisions of the Section 28, Flood Risk Management Guidelines

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA003

Submitted by:

Stephen Ward Consulting on behalf of Brian Hearty

Summary of Submission:

The submission relates to lands extending to 0.7ha south of Arran Court Dundalk, accessed off the R132. In the draft Plan these lands were zoned A2 – New Residential Phase 1 and during the Material Alterations were rezoned A3 – New Residential Phase 2. The owner of the lands, Mr. B. Hearty seeks the reinstatement of the lands to A2 – New Residential Phase 1.



In support:

- Change will not add more residential zoned land to the overall amount of residential zoned land;
- Is in keeping with Section 12(10)(c) of the Planning and Development Act 2000 (as amended) as the change to the order of priority sought is minor and wouldn't have significant effects on the environment or adversely affect the integrity of a European Site;
- Site is an infill site with available infrastructure and direct frontage onto adjoining R132;
- Would best suit lower density housing, would provide choice and wouldn't impact in material way on amount of residential zoned land or the number of dwellings in Dundalk.

Chief Executive's Response:

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development.

This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development.

The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development. In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 - New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 - New Residential Phase 1' being developed out.

The subject lands are located at the northern extremities of the residential zoning within Dundalk. The quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement and taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.'

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA032

Submitted by:

Doherty Developments Ltd.

Summary of Submission:

This is a submission on behalf of Doherty Developments Ltd. the owner of the lands edged with a solid red line below and forming part of proposed Material Alteration **DLK21** of the Draft Louth County Development Plan 2021 – 2027. The material alteration proposes a change to the order of priority zoning from A2 – New Residential Phase 1 to A3 New Residential – Phase 2. The submission seeks the reinstatement of the order of priority zoning A2 – Phase 1 to these lands.



It is noted that the change will not add more residentially zoned land to the overall amount of residentially zoned land and as such the proposal sought in this submission is in keeping with Section 12(10(c)) of the Planning and Development Act 2000 as amended.

The site is an infill and self-contained site with very well defined physical boundaries. The site has drainage and other infrastructure available.

The development of the site for housing, being a small self-contained infill site would not impact in any material way on the amount of residentially zoned land in Dundalk or the number of residential dwellings to be provided over the Plan period. It would however add choice to the housing market in the area.

It is strongly contended that approach taken by the planning authority to zoning fails to consider the supply side of the housing land supply availability equation and in particular the market element of the supply of land for residential development.

We believe the lands west of Mount Avenue require extensive up-front infrastructure and there is not a strong housing demand in this area of Dundalk.

The order of priority strategy as contained in the material amendments whereby the subject lands are moved down the order of priority from A2 New Residential – Phase 1 to A3 New Residential Phase 2 should not be adopted.

Doherty Developments Limited requests that the proposed material alteration to change the order of priority to 'Residential A3 – Phase 2' is not adopted and the 'Residential A2 – Phase 1' zoning order of priority as per the original draft Plan is adopted.

Chief Executive's Response:

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

The subject lands are located at the northern extremities of the residential zoning within Dundalk. The quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement and taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.'

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA011

Submitted by:

Sean Conyard

Summary of Submission:

This submission relates to Map 1.2 Dundalk Zoning and Flood Zones Map.



On the map our property is zoned as H1 Open Space. We have lived on the property since 1961 and operated our business from the property since 1963. Obviously the incorrect zoning of our home and business is of enormous concern to me and it needs to be correctly zoned on Map 1.2 before the Draft Louth County Council Development Plan 2021-2027 is finalised.

Chief Executive's Response:

The issues raised in the submission do not relate to a Material Alteration of the Draft Plan. Therefore in accordance with Section 12(7)(ad)(ii) this submission cannot be considered. There will be a further opportunity to review land use zoning in the preparation of the forthcoming Dundalk Local Area Plan.

Chief Executive's Recommendation:

No Change

Submission No.

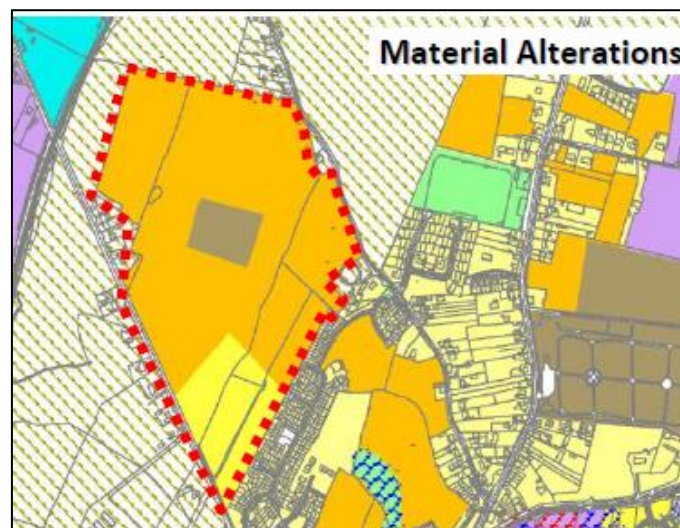
LCDP MA009

Submitted by:

Frank and Ronan McArdle

Summary of Submission:

This submission supports the proposed material alteration to change the zoning of the lands from L1 Strategic Reserve to Residential under the proposed material alteration **DLK3**, lands east of the Armagh Road, Dundalk. Given there is an extant planning permission on the lands (P.A. Ref. No. 18/1060 & 18/1061), it is submitted the entire lands would be more appropriately zoned Residential A2 – Phase 1.



Raises concerns about an article published in the Argus dated 25th of May which reported there appears to be have been significant confusion amongst the Councillors in relation to the fact there was an extant planning permission on the lands.

In support:

- It is noted that the change will not add more residentially zoned land to the overall amount of residentially zoned land.

- The modification proposes a change to the order of priority of a residential zoning the change sought in this submission would be minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site.
- The lands have a planning permission grant for 582 residential units, recreation & amenity space (including a 4 acre public park), a site for a crèche, a village centre, and a school (3 acres reserved site) which all form part of master plan that was drawn up in conjunction with the Council (as per attached map).
- In order ensure the implementation of the development in line master plan that was developed in conjunction with the Council my Client respectively requests all the subject lands are rezoned to category A2 Phase 1.
- The site is “shovel ready” and ready to go.
- The development will be a mix of both private and public housing.

Chief Executive’s Response:

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator at Draft Plan stage regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town’s growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

It should be noted that the OPR have recommended that the planning authority remove the A2 New Residential Phase 1 and A3 New Residential Phase 2 zoning from the submission lands (DLK3). There are two extant planning permissions on these lands for 582 residential units that are due to expire in Q4 of 2024.

Whilst the concerns raised by the OPR that the zoning of these lands does not provide for a sequential pattern of development or the creation of compact growth are noted, it was considered appropriate that these lands have a residential zoning to take account of the existing permission on these lands. This is consistent with the approach taken on other lands in Dundalk and indeed other settlements in the County such as Drogheda.

The subject lands are located at the northern extremities of the residential zoning within Dundalk. The quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement and taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.'

Chief Executive's Recommendation:

No Change

Submission No.

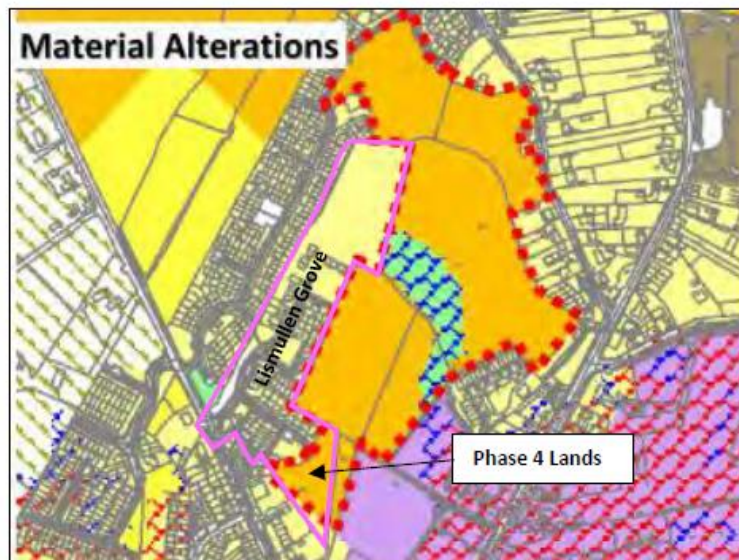
LCDP MA040

Submitted by:

O'Hare McGovern Ltd.

Summary of Submission:

O'Hare & Mc Govern are keen to finish out the Lismullen Grove development and following a pre-planning meeting on 15th March 2021, planning applications for the final phases i.e. Phases 3 and 4 are due to be lodged with Louth County Council imminently.



The submission seeks that the proposed material alteration to place the Phase 4 portion of the Lismullen Grove site in the order of priority residential zoning A2 to A3 is not adopted and that this part of the site remains A2 as per the Draft Plan.

In support:

- The change will not add more residentially zoned land to the overall amount of residentially zoned land and as such the proposal sought in this submission is in keeping with Section 12(10(c)) of the Planning and Development Act 2000 as amended as given the modification proposes a change to the order of priority of a residential zoning the change sought in this submission would be minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site or result in an increase in the area of land zoned for any purpose.
- The lands are an infill site and as such would not have any material impact on overall order of priority A2 lands or housing numbers over the period of the proposed new Development Plan.
- The reinstatement of the A2 order of priority residential zoning as per the Draft Plan will ensure the development is finished out in an orderly and integrated manner, whilst also allowing for a better quality design and layout.
- The lands are not environmentally constrained.
- The lands are well within the established built-up area of the town of Dundalk and are essentially enveloped by existing residential development.
- The lands are less than 1km from Dundalk's Main Street, with direct and continuous footpath connections available.
- The development of the submission lands would without doubt represents sequential and compact growth and contribute to consolidation of the urban area, consistent with policies in the NPF, the RSES as well as all relevant Section 28 Ministerial Guidelines.
- The lands can be serviced and safe access can be provided via the existing access to Lismullen Grove off the Armagh Road.

Chief Executive's Response:

The lands associated with proposed Material Alteration DLK 22 were zoned 'A2 New Residential' in the Draft Plan. In response to Recommendation 4 of the OPR submission to the Draft County Development Plan with regards to the quantum of lands zoned for residential development it was recommended to amend the zoning to 'A3 New Residential – Phase 2'.

In their submission to the Material Alterations (MA Recommendation 4) the OPR recommended that the A3 New Residential – Phase 2 zoning on these lands is removed. These lands lie between existing shops, services and facilities along the Newry Road and an existing residential development Lios Dubh off the Armagh Road and in the long term there is an opportunity to create an infill development at this location. There are no objections to changing these lands back to 'A2 New Residential – Phase 1'.

Chief Executive's Recommendation:

It is recommended that proposed Material Alteration DLK 22 is not included as a Material Alteration to the Draft Plan and the zoning for these lands reverts back to that as proposed in the Draft County Development Plan i.e. A2 New Residential Phase 1.

Please refer to Appendix 1 for details of the mapping changes associated with this recommendation.

Submission No.

LCDP MA046

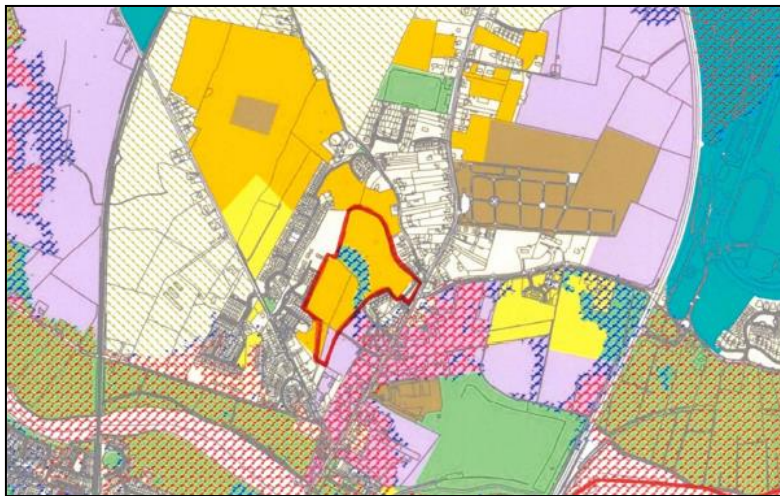
Submitted by:

Mr. Freddie Johnston

Summary of Submission:

This submission relates to material alteration **DLK22**.

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. It is submitted that the Draft Plan correctly zoned these lands as A2 Residential Phase 1.



The lands are near the town centre. 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 services, shops and community facilities nearby.

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.

The proposed lands are proximate to relevant facilities and amenities within walking and cycling distances.

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.

The site provides a balanced development to the southern side of the town that is continually moving southwards away from the centre.

There does not appear, in our opinion, to be a logical argument to down grade this zoning.

Chief Executive's Response:

The lands associated with proposed Material Alteration DLK 22 were zoned 'A2 New Residential' in the Draft Plan. In response to Recommendation 4 of the OPR submission to the Draft County Development Plan with regards to the quantum of lands zoned for residential development it was recommended to amend the zoning to 'A3 New Residential – Phase 2'.

In their submission to the Material Alterations (MA Recommendation 4) the OPR recommended that the A3 New Residential – Phase 2 zoning on these lands is removed. These lands lie between existing shops, services and facilities along the Newry Road and an existing residential development Lios Dubh off the Armagh Road and in the long term there is an opportunity to create an infill development at this location. There are no objections to changing these lands back to 'A2 New Residential – Phase 1'.

Chief Executive's Recommendation:

It is recommended that proposed Material Alteration DLK 22 is not included as a Material Alteration to the Draft Plan and the zoning for these lands reverts back to that as proposed in the Draft County Development Plan i.e. A2 New Residential Phase 1.

Please refer to Appendix 1 for details of mapping changes associated with this recommendation.

Submission No.

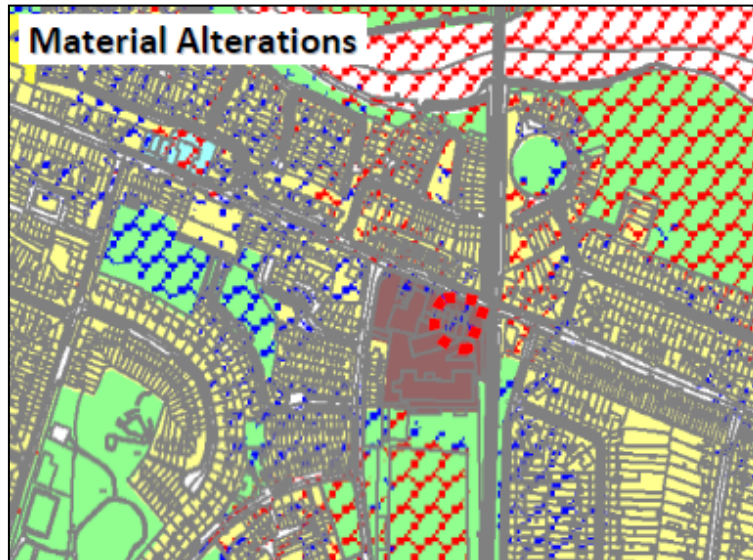
LCDP MA064

Submitted by:

Declan Flood

Summary of Submission:

The submission concerns DLK17 and seeks the zoning of lands at Castletown Road (west of Railway Bridge) from C1 mixed Use to A2 New Residential.



The current zoning is unsuitable. The site is vacant and has been for decades. It can only be accessed off Brickfield Close (an existing small number of houses). The site is ideal to accommodate a single dwelling. The site can facilitate consolidated development which is encouraged at national and regional level.

Chief Executive's Response:

The site is located on lands zoned as C1 Mixed Use C1. As per Section 13.19.12 of the draft Louth County Development Plan 2021-2027, the objective of the Mixed Use zoning is to provide for commercial, business and supporting residential uses. Residential is listed as a 'Generally Permitted Use', any application would be subject to normal planning considerations, compliance with the relevant policy objectives and standards set out under this Plan, and any relevant ministerial guidance.

Notwithstanding this, there will be a further opportunity to review land use zoning in the preparation of the forthcoming Dundalk Local Area Plan.

Chief Executive's Recommendation:

No Change

Submission No.

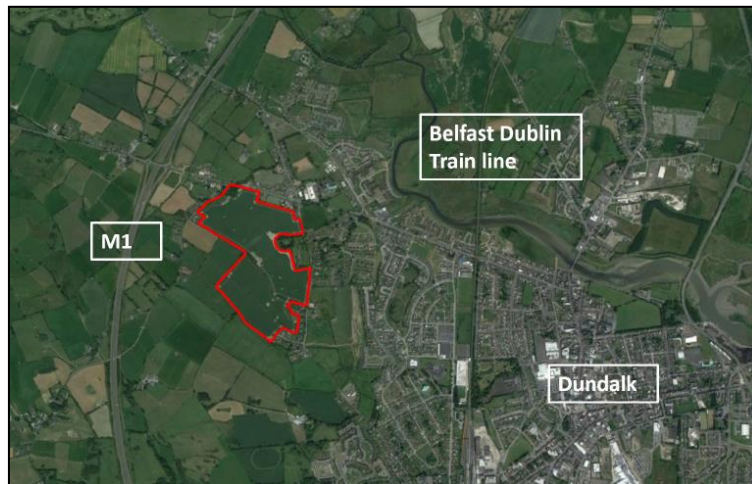
LCDP MA029

Submitted by:

Breen Holdings

Summary of Submission:

This submission relates to **DLK 23** - to change the status of the subject lands to A3 New Residential Phase 2. If this zoning objective for the lands is maintained, it means that the client's lands could not be brought forward for residential development during the lifetime of the Louth Development Plan 2021-2027, unless Phase 1 zoned lands fails to be developed in the next 3-4 years.



The subject lands can support the achievement of NPF objectives in the short term, in particular within the principles of compact growth and the reinforcement of the country's existing urban structure at all levels.

The subject lands can support the achievement of EMRA RSES's objective and is entirely suitable for residential development in the short term. Not alone is Dundalk town targeted for growth in the RSES, but that the Mount Avenue area of the town has been explicitly identified as one of the key areas where this growth should take place.

Breen Holdings is committed to bringing forward the subject lands extending to 94 acres for residential development in the lifetime of the new County Development Plan. The Material Alterations will undermine the Core and Settlement Strategy in the Draft Louth Development Plan and in wider National and Regional Policy to deliver more housing at sustainable locations, such as Mount Avenue.

The subject lands are already fully serviced with the necessary physical infrastructure to support residential development; the lands are well located to support the orderly and sequentially sustainable development of Dundalk, a Regional Growth Centre; and the lands are highly accessible both to existing and proposed public transport facilities, as well as to the national road network.

These lands have been identified in the RSES as one of the principle locations within which the future growth of Dundalk should be located, and the Government have already provided LIAF funding to upgrade the Mount Avenue road to facilitate the development of these and other lands in the area for residential use. Therefore, it would be contrary to both national and regional policy for these lands at Mount Avenue, not to be appropriately zoned to accommodate residential development during the period of the new County Development Plan.

The subject lands are ideally situated to deliver future residential development in Dundalk, and accordingly we respectfully request that the subject lands be changed back to being A2 New Residential Phase 1, and that proposed Material Amendment DLK 23 not be adopted.

Chief Executive's Response:

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

It is acknowledged that given the subject lands proximity to Dundalk town centre, they will form an important part of future residential development within the town. However, the quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement and taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.' It is also noted that the lands are subject to a Masterplan and the existing roads infrastructure will be required to be upgraded to facilitate additional traffic flows and movements.

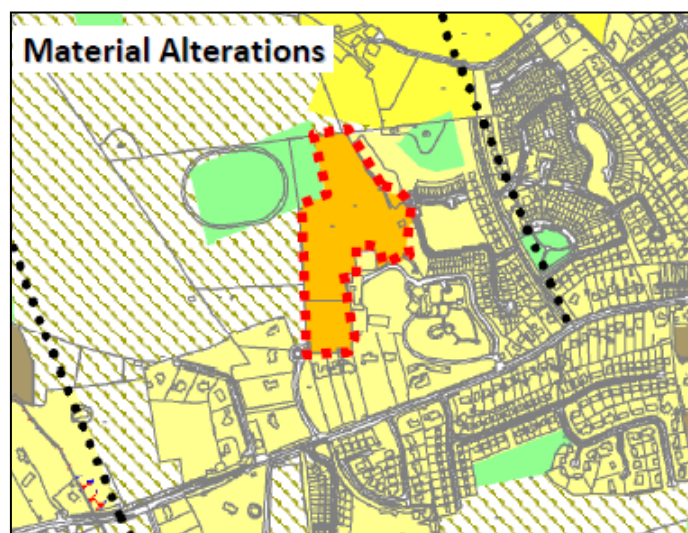
Chief Executive's Recommendation:

No Change

Submission No.	LCDP MA012
Submitted by:	Paul Monahan

Summary of Submission:

This submission supports the proposed material alteration to change the zoning of the lands from L1 Strategic Reserve to A3 Residential Phase 2 under proposed material alteration **DLK6**. However, it is submitted that the lands would be more appropriately zoned Residential A2 – Phase 1 and this change is sought.



In support:

- It is noted that the change will not add more residentially zoned land to the overall amount of residentially zoned land
- The modification proposes a change to the order of priority of a residential zoning the change sought in this submission would be minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site.
- The site is 1km from the railway station (10 minute walk/ 5 minute cycle) and 1.5km from the town centre (15 minute walk /8 minute cycle).
- Without doubt they represent sequential and compact growth and contribute to consolidation of the urban area.
- There are footpaths and public lighting the whole way from the site to the railway station and the town centre.
- There are dedicated cycle paths on the main estate road in Lis Na Dara & there are partial on-road cycle lanes on the Carrick Road towards the town centre.
- The lands are not environmentally constrained.
- Planning permission for c92 dwellings was previously granted on the lands under P.A. Ref. 08/60.
- The lands have very well defined physical boundaries and would in reality represent a sensible, self-contained and limited development rounding off the Lis Ma Dara housing development.
- The lands can be serviced and safe access can be provided. This has been confirmed by an engineering assessment by Waterman Moylan Consulting Engineers.
- The lands are only a few minutes' walk from the Crèche / neighbourhood Centre at Lis Na Dara and development of the lands would be a sensible and defined "rounding-off" of the Lis Na Dara development and represent compact growth.
- The lands are in my sole ownership and as an experienced developer with a track record of delivery of developments I am keen to move these lands forward for development at the earliest opportunity. I have a full planning and development team in place to progress the development which will help to deliver much needed housing and alleviate the current shortage of suitable homes.

Chief Executive's Response:

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator at Draft Plan stage regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

The subject lands are located at the western extremities of the residential zoning within Dundalk. The quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement and taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.'

Chief Executive's Recommendation:

No Change

Submission No.

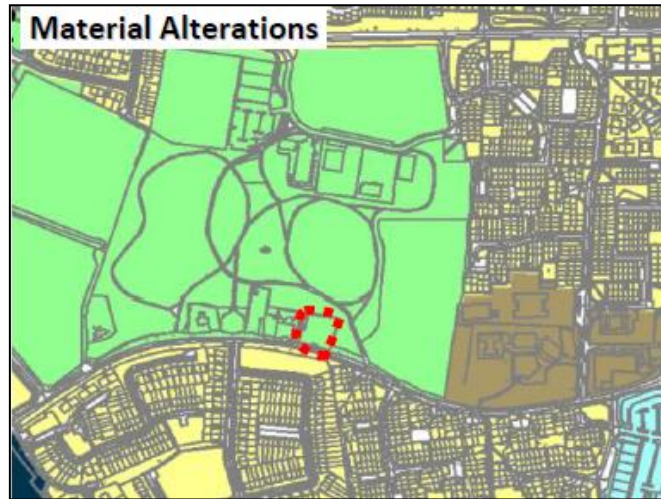
LCDP MA065

Submitted by:

Mr. Pat McArdle

Summary of Submission:

The submission concerns DLK16 and seeks the zoning of lands at Hoeyes Lane from Recreation, Amenity and Open Space to New Residential.



The area around the site is predominately residential. Without a zoning change to Residential this site will remain undeveloped as it is very unlikely a viable use for this defunct recreation site will be found.

Chief Executive's Response:

It is acknowledged that there are existing residential properties to the east of the subject lands. The subject lands were proposed to be zoned A2 'New Residential' in the Draft County Development Plan however as part of the consideration of the submissions received on the Draft County Development Plan the Elected Members voted to change this zoning back to H1 Open Space.

There will be an opportunity to review the land use zoning of this site as part of the preparation of the forthcoming Dundalk Local Area Plan.

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA044

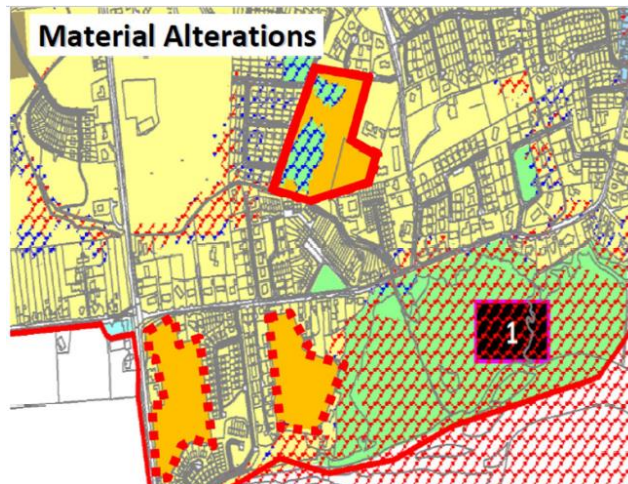
Submitted by:

B. N & B. Carroll

Summary of Submission:

This submission seeks;

- 1 That the proposed material alteration to change the zoning order of priority from 'Residential A2 – Phase 1' to 'Residential A3 – Phase 2' is not adopted and that the A2 order of priority zoning as per the draft Plan is adopted (**Proposed Material Alteration DLK27**).
- 2 That the proposed material alteration to change the zoning of parts of the lands from A2 to H1 – open space is not adopted and the whole site maintains its A2 order of priority zoning as per the draft Plan.



The Carrolls have engaged a consulting engineer with expertise in flood matters to prepare a report on this matter (Appendix A of the submission).

The Engineer's Report finds the amended SFRA may not be consistent with the Planning Authorities and Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, specifically Criteria 2 of Box 4.1 of the Justification Test for Development Plans.

According to the Report, there is no evidence in the revised SFRA that an assessment of the submission lands was undertaken in accordance with item no.'s (i) - (v), as required.

The risk of flooding could be addressed by low depth infilling of the affected areas with no displacement of waters elsewhere. This matter could be addressed at planning application stage by way of a Site Specific Flood Risk Assessment.

The Engineer's Report also highlights further deficiencies in the amended SFRA in that it fails to take account of proposed flood defence measures for Blackrock due to be commenced and completed during the lifetime of the emerging Development Plan, noting that the works proposed will reduce the residual risk in the Blackrock area, including the submission lands.

In support;

- Dundalk is identified as a Regional Growth Centre and Blackrock is one of the main residential areas within the defined settlement boundary of the Town. The Village is located just over 2km to a cluster of major national and international employers including DKIT; Wuxi; Xerox and Paypal – the same distance as Dundalk Town Centre. Direct and continuous footpath links are available to these employment areas from Blackrock. The Village has two primary schools; a large-scale supermarket and a wide range of community, retail and social infrastructure concentrated along its Main Street, approximately 750 m from the submission lands. The Village functions, and has always functioned, as an autonomous housing area in its own right.
- The Carroll lands are fully serviced with all drainage infrastructure already in place. Access to the lands is also available via Springfield through the existing access point off Wallace's Road. The development of the submission lands would essentially represent a natural extension to the existing Springfield development, as envisaged under the previously permitted development P.A. Ref. No. 07/372.
- The development of the submission lands would, without doubt represent sequential and compact growth and contribute to consolidation of the urban area of Blackrock. Blackrock, whilst part of the Louth Plan review has a distinct housing market from the Dundalk town area.
- The lands are enveloped by permitted and existing residential development on all sides, with Ard Na Mara to the west, Springfield to the north, a large detached dwelling to the east and St. Fursey's Terrace and Ard Shee to the south. As such, development of the lands for residential purposes represents a clear, limited and defensible expansion of the urban area of Blackrock in a sequential manner given the lands are enveloped by existing housing.
- The lands have very well defined physical boundaries and would in reality represent a sensible, self contained and limited development rounding off the Blackrock urban area.
- Planning permission was granted for 45 dwellings on the site under PA Ref. 07/372 but unfortunately this permission was not implemented because of the financial crisis that occurred in 2008.
- The lands are just over 600 metres from St. Francis National School via Seafield Road and Rock Road. The lands are east and nearer the village centre than the recently permitted ABP Strategic Housing Development for 257 dwellings (ABP Ref. 308135) and An Bord Pleanála in granting planning permission for that proposed development found its location to be sustainable and the development of the lands to comply with national and regional planning policy and in the interests of the proper planning and development of the area.
It follows, it is submitted, and that the Carrolls lands are equally, if not in fact better suited for residential development.
- There are footpaths and public lighting the whole way from the site to Blackrock Village centre.
- The lands are not environmentally constrained.

- The lands can be serviced and safe access can be provided via Springfield. There is a foul sewer and surface water drainage system at the site.
- The lands are in the sole ownership of the Carrolls and they are ready and available for development. I am informed that Carrolls are in advanced discussions with a housebuilder with a track record of delivery of residential developments.

Chief Executive's Response:

In relation to Point 1 of the submission (Proposed Material Alteration DLK27), the decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 - New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 - New Residential Phase 1' being developed out.

Whilst it is acknowledged the subject lands are in proximity to existing services and facilities in Blackrock and adjacent to existing residential neighbourhoods, the overall quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement. Taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.'

In relation to Point 2 of the submission (Proposed Material Alteration DLK37), it should be noted that the zoning change from A2 New Residential to H1 Open Space was in response to the Office of Public Works (OPW) submission to the Draft Plan. All mapping of zoned land within each of the settlements has been assessed in line with the sequential approach and subject to justification tests as per the requirements of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009).

In this instance the lands are vulnerable to flooding and are affected primarily by Flood Zone B, wherein the primary provision of residential development is not appropriate. The criteria for passing the Justification Test were not met in this instance and it was recommended that the lands were re-zoned to 'Open Space'.

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA045

Submitted by:

B. N & B. Carroll

Summary of Submission:

This submission that the proposed material alteration to change the zoning of parts of the lands from A2 to H1 – open space is not adopted and the whole site maintains its A2 order of priority zoning as per the draft Plan.



The Carrolls have engaged a consulting engineer with expertise in flood matters to prepare a report on this matter (Appendix A of the submission).

The Engineer's Report finds the amended SFRA may not be consistent with the Planning Authorities and Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, specifically Criteria 2 of Box 4.1 of the Justification Test for Development Plans.

According to the Report, there is no evidence in the revised SFRA that an assessment of the submission lands was undertaken in accordance with item no.'s (i) - (v), as required. Commenting on this evidence-based vacuum the Report notes,

The risk of flooding could be addressed by low depth infilling of the affected areas with no displacement of waters elsewhere. This matter could be addressed at planning application stage by way of a Site Specific Flood Risk Assessment.

The Engineer's Report also highlights further deficiencies in the amended SFRA in that it fails to take account of proposed flood defence measures for Blackrock due to be commenced and completed during the lifetime of the emerging Development Plan, noting that the works proposed will reduce the residual risk in the Blackrock area, including the submission lands.

In support;

- Dundalk is identified as a Regional Growth Centre and Blackrock is one of the main residential areas within the defined settlement boundary of the Town. The Village is located just over 2km to a cluster of major national and international employers including DKIT; Wuxi; Xerox and Paypal – the same distance as Dundalk Town Centre. Direct and continuous footpath links are available to these employment areas from Blackrock. The Village has two primary schools; a large-scale supermarket and a wide range of community, retail and social infrastructure concentrated along its Main Street, approximately 750 m from the submission lands. The Village functions, and has always functioned, as an autonomous housing area in its own right.
- The development of the submission lands would, without doubt represent sequential and compact growth and contribute to consolidation of the urban area of Blackrock. Blackrock, whilst part of the Louth Plan review has a distinct housing market from the Dundalk town area. This needs to be considered in the zoning of land for new residential development.
- The lands are enveloped by permitted and existing residential development on all sides, with Ard Na Mara to the west, Springfield to the north, a large detached dwelling to the east and St. Fursey's Terrace and Ard Shee to the south. As such, development of the lands for residential purposes represents a clear, limited and defensible expansion of the urban area of Blackrock in a sequential manner given the lands are enveloped by existing housing.
- The lands have very well defined physical boundaries and would in reality represent a sensible, self contained and limited development rounding off the Blackrock urban area.
- Planning permission was granted for 45 dwellings on the site under PA Ref. 07/372 but unfortunately this permission was not implemented because of the financial crisis that occurred in 2008.
- The lands are just over 600 metres from St. Francis National School via Seafield Road and Rock Road. The lands are east and nearer the village centre than the recently permitted ABP Strategic Housing Development for 257 dwellings (ABP Ref. 308135) and An Bord Pleanála in granting planning permission for that proposed development found its location to be sustainable and the development of the lands to comply with national and regional planning policy and in the interests of the proper planning and development of the area. It follows, it is submitted, and that the Carrolls lands are equally, if not in fact better suited for residential development.
- There are footpaths and public lighting the whole way from the site to Blackrock Village centre.
- The lands are not environmentally constrained.
- The lands can be serviced and safe access can be provided via Springfield – the original phase developed by the Carrolls. There is a foul sewer and surface water drainage system at the site.
- The lands are in the sole ownership of the Carrolls and they are ready and available for development.

Chief Executive's Response:

The zoning change from A2 New Residential to H1 Open Space was in direct response to the Office of Public Works (OPW) submission to the Draft Plan. All mapping of zoned land within each of the settlements has been assessed in line with the sequential approach and subject to justification tests as per the requirements of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009).

In this instance the lands are vulnerable to flooding and are affected primarily by Flood Zone B, wherein the primary provision of residential development is not appropriate. The criteria for passing the Justification Test were not met in this instance and it was recommended that the lands were re- zoned to 'Open Space'.

Chief Executive's Recommendation:

No Change

Submission No.

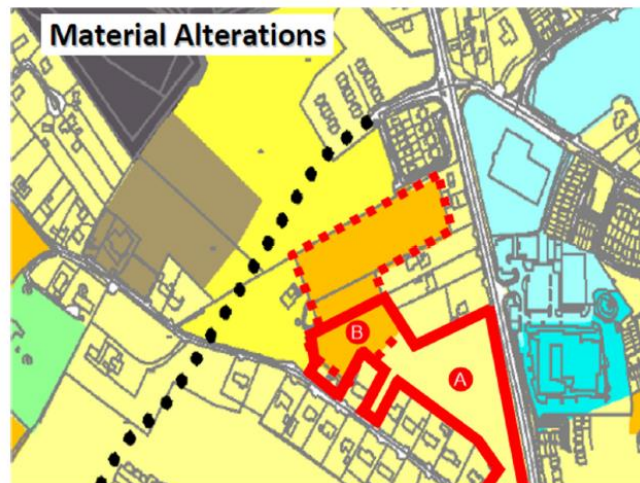
LCDP MA008

Submitted by:

Urban Life Limited

Summary of Submission:

This submission relates to lands identified as Area B, located to the west of the Fairways Hotel affected by the proposed material alteration **DLK25**. The submission seeks that the proposed material alteration to change the zoning order of priority from 'Residential A2 – Phase 1' to 'Residential A3 – Phase 2' is not adopted and that the A2 order of priority zoning as per the Drat Plan for this part of the site is adopted.



In support:

- It is noted that the change will not add more residentially zoned land to the overall amount of residentially zoned land
- The modification proposes a change to the order of priority of a residential zoning the change sought in this submission would be minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site.
- The amendment sought relates to a small area of land extending to c0.61ha which if developed at 30dph would result in 49 dwellings and this would not have any material impact on overall order of priority A2 lands or housing numbers over the period of the proposed new Development Plan.
- Site is directly opposite the designated neighbourhood centre at the Fairways Hotel and pedestrian and cycle access to the neighbourhood centre is available at the signal controlled junction at the Old Golf Links Road.
- The site is also close to the 'Xerox' Technology Park which is one kilometre north of the site with footpaths and public lighting over its full length and with on-street cycle tracks over the majority of the Dublin Road from the site to the Dublin Road entrance to the Technology Park.
- The lands are not environmentally constrained.
- The lands are well within the established built-up area of the town of Dundalk.
- The lands can be serviced and safe access can be provided.
- The lands are in the sole legal control of Urban Life an experienced house builder with a track record of delivery of developments particularly in the County of Louth.

Chief Executive's Response:

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

Whilst it is acknowledged the subject lands are in proximity to existing services and facilities on the Dublin Road (R132) and adjacent to existing residential neighbourhoods, the overall quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement. Taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.'

Chief Executive's Recommendation:

No Change

Submission No.

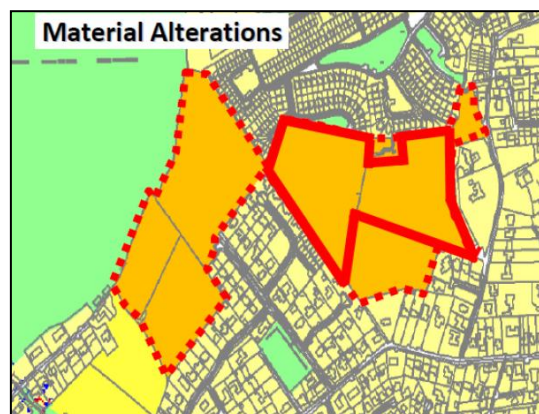
LCDP MA007

Submitted by:

Shannon Homes (Blackrock) Ltd

Summary of Submission:

The submission relates to a substantial portion of the land affected by the proposed material alteration **DLK26**. The submission seeks that the proposed material alteration to change the zoning order of priority from 'Residential A2 – Phase 1' to 'Residential A3 – Phase 2' is not adopted and that the A2 order of priority zoning as per the draft Plan is adopted.



In support:

- The development of the submission lands is a natural and sensible southerly extension of the Blackrock Cove development to the north which was developed by Shannon Homes.
- Shannon Homes has a strong track record of delivering housing in the Blackrock area, having built the very successful Blackrock Cove development to the north of the submission lands.
- There are 50 people employed on the Blackrock Cove development and these would be moved to the development on the submission lands. This level of employment represents a significant injection of money into the local economy.
- The development of the submission lands would, without doubt, represent sequential and compact growth and contribute to consolidation of the urban area of Blackrock. Blackrock, whilst part of the Louth Plan review, has a distinct housing market from the Dundalk town area. This needs to be considered in the zoning of land for new residential development.

- The lands are enveloped by permitted and existing residential developments to the south-west, north-east and south-east including SHD permission 303253 for c.166 dwellings and by Dundalk Golf Club to the north-west.
As such, development of the lands for residential purposes represents a clear, limited and defensible expansion of the urban area in a sequential manner given the lands are enveloped by permitted and existing housing.
- The lands are just over 1km from Blackrock seafront via Rock Road and Sandy Lane. They are within 1km of St. Francis National School and within 600 metres of Blackrock Community Centre and Blackrock Park and the associated amenities of Rock Celtic.
- There are footpaths and public lighting the whole way from the site to Blackrock Village centre.
- The lands are not environmentally constrained.
- The lands have very well defined physical boundaries and would in reality represent a sensible, self-contained and limited development rounding off the Blackrock urban area. The golf club lands represent a strong and visible limit to the north-westerly expansion of the Blackrock urban area.
- The lands can be serviced and safe access can be provided.

Chief Executive's Response:

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

Whilst it is acknowledged the subject lands are in proximity to existing services and facilities in Blackrock and adjacent to existing residential neighbourhoods, the overall quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement. Taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2'.

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA010

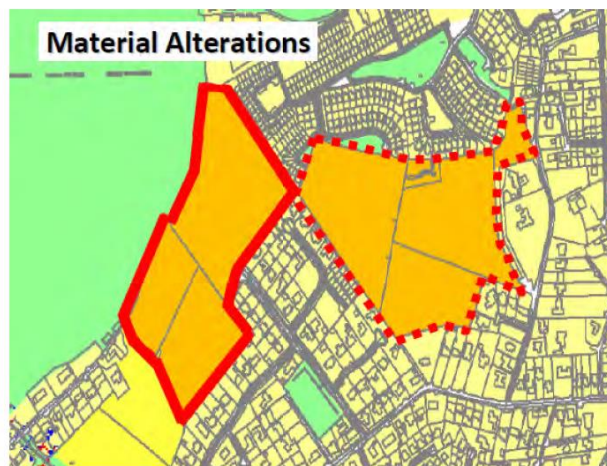
Submitted by:

McGahon Partnership

Summary of Submission:

This submission concerns lands SE & SW of Blackrock Cove, Dundalk and relate to material alteration **DLK27**. The submission seeks that the proposed material alteration to change the zoning order of priority from 'Residential A2 – Phase 1' to Residential A3 – Phase 2' is not adopted and that the A2 – Phase 1 order of priority zoning as per the draft Plan is adopted.

The McGahon Partnership land ownership extends to c5.5ha and is identified by a solid red line on the map below.



In support:

- Lands represent an extension to the Hamilton development, can be accessed through the Hamilton development and are serviced and ready to go for development.
- There is a well-recognised shortfall in housing in the Dundalk area to provide housing for existing and new employees in the area.
- There is a very clear disconnect between what is perceived to be an over-supply of zoned housing land and the actual supply of new houses.
- The development of the submission lands would, without doubt represent sequential and compact growth and contribute to consolidation of the urban area of Blackrock.
- Blackrock, whilst part of the Louth Plan review has a distinct housing market from the Dundalk town area. This needs to be considered in the zoning of land for new residential development and the order of priority contained therein.
- The lands are enveloped by permitted and existing residential to the south-west, north-east and south-east.
- The lands are just over 1km from Blackrock seafront via Hamilton Avenue, Rock Road and Sandy Lane. They are within 1km of St. Francis National School and within 600 metres of Blackrock Community Centre and Blackrock Park and the associated amenities of Rock Celtic.
- The lands represent infill development and the completion of the existing Hamilton scheme of development.

- There are footpaths and public lighting the whole way from the site to Blackrock Village centre.
- The lands are not environmentally constrained.
- The lands have very well defined physical boundaries and would in reality represent a sensible, self-contained and limited development rounding off the Blackrock urban area. The golf club lands represent a strong, and visible limit to the north-westerly expansion of the Blackrock urban area.
- The lands can be serviced and safe access can be provided via Hamilton Avenue.

Chief Executive's Response:

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

The quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement and taking into account the excess of residential lands in Dundalk it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.'

Chief Executive's Recommendation:

No Change

Section 4 (ii)

Chief Executive's
Summary, Response
and Recommendation
on Zoning Submissions
Ardee

Submission No.

LCDP MA016

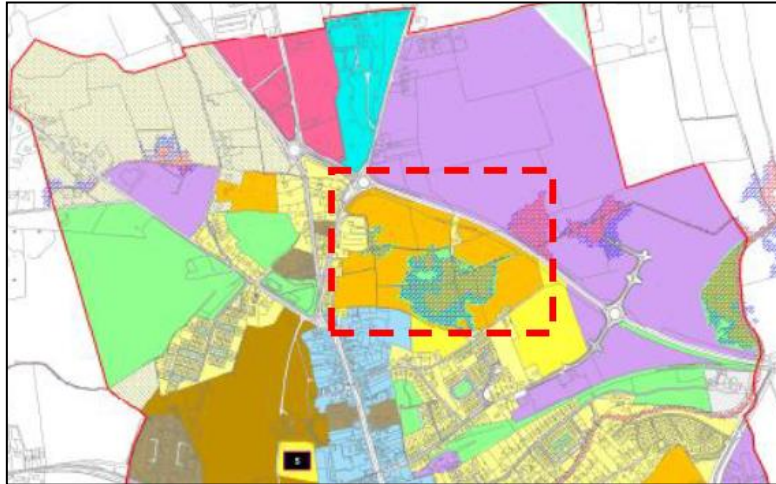
Submitted by:

Patrick Reilly, Brendan Roe, Seamus Roe and
Tara Mullarkey

Summary of Submission:

The submission relates to ARD5 and ARD6.

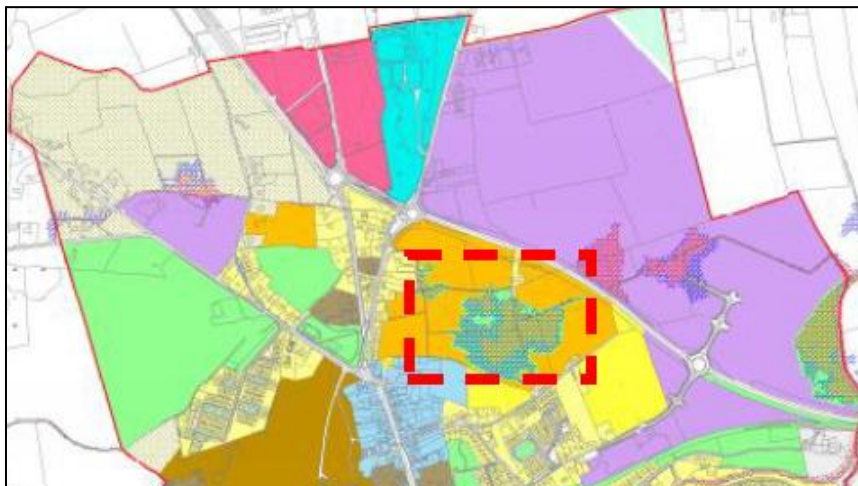
Requests rejection of ARD5



In support:

- Land zoned Residential for 20 years (2002). Masterplan in place since 2008. Unable to develop until commencement of connective roadways in 2021.
- Zoning from Agriculture to Residential was not sought by landowners. Masterplan was not signed off by 3 main landowners.
- Ardee zonings will delay development to the north of the town and contribute to a north/south housing imbalance.
- Bridgegate development has 'leapfrogged' the subject lands in terms of development.
- Adjoining landowner being given preferential treatment with regards to residential phasing.

Requests rejection of ARD6



In support:

- CFRAM is flawed. No remedial cleaning or drainage works carried out in 25-30 years.
- Information for Elected Reps fails to mention 'potential risk'.
- LCC allowing untreated sewerage effluent over the lands.
- Has flood risk not been significantly reduced by implementing new road network and removal of culvert.
- OPW submission states that PFRA 'are only a broad assessment providing an indication of areas that may be prone to flooding'.
- Zoning of Open Space is crude and not evidence based.
- Open Space zoning fundamentally alters the Masterplan.
- Suggested retention pond on Industrial/Employment zone north of N33.

Chief Executive's Response:

In relation to the first point within this submission (requesting the rejection of ARD5), the decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

The subject lands are located at the northern extremities of the residential zoning within Ardee. The quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement and taking into account the excess of residential lands in Ardee it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.'

In relation to the second point raised within this submission (requesting the rejection of ARD6), it should be noted that the zoning change from A2 New Residential to H1 Open Space was in direct response to the Office of Public Works (OPW) submission to the Draft Plan. All mapping of zoned land within each of the settlements has been assessed in line with the sequential approach and subject to justification tests as per the requirements of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009).

In this instance the lands are vulnerable to flooding and are affected primarily by Flood Zone A and B, wherein the primary provision of residential development is not appropriate. The criteria for passing the Justification Test were not met in this instance and it was recommended that the lands were re-zoned to 'Open Space'.

Chief Executive's Recommendation:

No Change

Submission No.

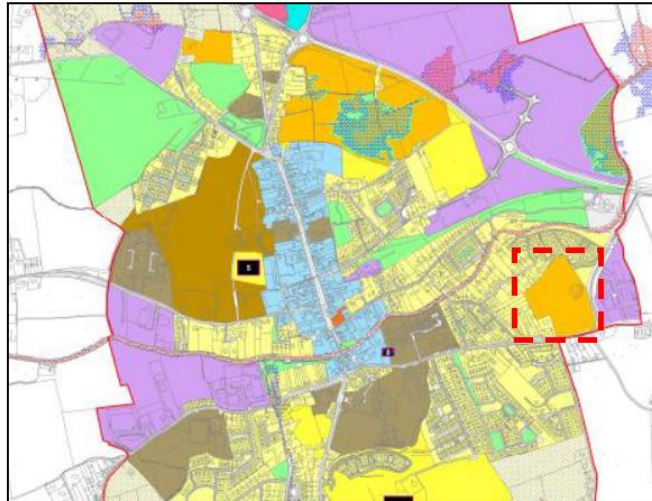
LCDP MA031

Submitted by:

Forevergreen Construction Ltd.

Summary of Submission:

This submission contends that proposed material alteration of the 'Castleguard Site with Motte' from A2 New Residential to A3 New Residential Phase 2 appears to be based on submission 071 and may be an error.



The subject land is directly adjacent to Castleguard Manor housing estate to the north and Dawson's Demesne housing estate to the west and as such should be considered infill development.

The subject land is fully serviceable and there is currently direct access to the land from the R170 and potentially from the Castleguard Road which links the R170 to the N33.

The submission contends that the issue of actual development and therefore supply to the market of good quality housing is not considered.

The choice on where town's people want to live is very restrictive due to the lack of development within the town - only 2 residential development sites currently exist.

The clients are developers who have constructed good quality and affordable dwellings in the past and feel that this site is ideal for the future development of the town. This land is 'ready to go' and so are they.

Chief Executive's Response:

The lands in question were zoned as A2 New Residential in the Draft Louth County Development Plan 2021-2027. In the CE Report on the Submissions to the Draft Plan the residential zoning was retained but updated to a new land use category A2 New Residential Phase 1.

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development.

This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan. It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development. The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

Notwithstanding the above, it was subsequently proposed to change the lands from A2 New Residential Phase 1 to A3 New Residential Phase 2 by way of Councillor Motion under Section 12 (5) of the Planning and Development Act 2000 (as amended).

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

Whilst it is acknowledged the subject lands are in proximity to existing services and facilities adjacent to existing residential neighbourhoods at Castleguard the quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement. Taking into account the excess of residential lands in Ardee it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.' There will be an opportunity to review this land use zoning as part of the preparation of the Ardee Local Area Plan.

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA037

Submitted by:

Mr. P. Callaghan

Summary of Submission:

Peter Callaghan is the owner of the land affected by the proposed material amendment ARD1 extending to c.4.7ha and is identified by a dashed red line on the map below.

This submission seeks that the proposed material alteration to change the zoning order of priority from 'Residential A2 – Phase 1' to Residential A3 – Phase 2' is not adopted and that the A2 – Phase 1 order of priority zoning as per the draft Plan is adopted.



It is noted that the change will not add more residentially zoned land to the overall amount of residentially zoned land and as such the proposal sought in this submission is in keeping with Section 12(10(c)) of the Planning and Development Act 2000 as amended.

It is apparent that the order of priority change should have applied to the lands affected by submission 071 which are the lands edged red in Figure 2 and not to Mr. Callaghan's lands.

It is strongly contended that the approach to residential phasing in Ardee fails to consider the supply side of the housing land supply availability equation and in particularly the market element of the supply of land for residential development.

There is a very clear disconnect between what is perceived to be an over-supply of zoned housing land and the actual supply of new houses. It is submitted a key reason for this disconnect is that the IALUEs do not consider the supply side of the housing supply equation in terms of the actual availability of residentially zoned land and the market demand for annual sales in the event such land does come forward.

The submission lands are available, serviceable and zoned for residential development in the draft Louth County Development Plan.

The development of these lands would consolidate the existing urban area and offer a realistic contribution to the housing need identified for Ardee by the Core Strategy.

In support:

- The development of the submission lands would, without doubt represent sequential and compact growth and contribute to consolidation of the urban area of Ardee. These lands are contained within the urban footprint of Ardee and contiguous to existing residential development.
- The submission lands are within 1km of the town centre with full footpath connectivity. There is a primary school within 500m of the submission lands and Ardee Community School is just over 1km walking distance to the east. The primary school, Scoil Mhuire Na Trócaire, is to be extended to provide to additional 80m² classrooms and Ardee Community school is due to be substantially increased in capacity with 18no. general classrooms in addition to 4no. specialised classrooms to be provided under the Additional Accommodation Scheme 2021.
- The main bus route serving Ardee is within 1km of the application site at the junction of the N2 and R170.
- The development of the lands for residential purposes represents a clear, limited and defensible expansion of the urban area in a sequential manner given the lands are enveloped by existing housing and roads infrastructure in proximity to employment lands. The submission lands are essential an infill site.
- There are no infrastructural constraints identified on these lands by the IALUE prepared to inform the draft Development Plan in terms of roads, water supply or wastewater. The site is connected to the town centre by existing footpaths with public lighting in place and scores highly in terms of its proximity to community services including schools.
- The lands are not environmentally constrained with no Flood Zone affecting these lands.
- The lands are in the sole ownership of Peter Callaghan who is keen to move these lands forward for development at the earliest opportunity.

Chief Executive's Response:

The lands in question were zoned as A2 New Residential in the Draft Louth County Development Plan 2021-2027. In the CE Report on the Submissions to the Draft Plan the residential zoning was retained but updated to a new land use category A2 New Residential Phase 1.

The decision to introduce phasing of residential lands was in response to concerns raised by the Office of the Planning Regulator regarding the quantum of residential lands available for development. This phasing, which is proposed in Dundalk and Ardee, will assist in managing the release of residential lands during the lifetime of the Plan.

It is based on the principles of creating compact and sustainable settlements where new developments are located within walking distance of schools, facilities, and services and that release of the lands will contribute to a consolidated pattern of development.

The approach taken provides for a framework that will allow greater certainty as to where the focus for expansion of residential areas is to be, ensuring consolidation of the urban core and that the town's growth is directed to those areas that can best accommodate and facilitate sustainable growth over the plan period.

A number of factors were considered in the phasing of residential lands including the sequential approach, if the lands would contribute to compact growth, any extant permissions on the subject lands or the surrounding area, and the quantum of residential lands available in the area. It has also been informed by the Infrastructure Assessment and Land Use Evaluation (IALUE).

The Draft Plan places a strong emphasis on encouraging infill opportunities and better use of underutilised lands, with identified A2 New Residential Phase 1 lands being contiguous to existing developed areas where possible or where there is availability of services and appropriate infrastructure that would accommodate further development.

Notwithstanding the above, it was subsequently proposed to change the lands from A2 New Residential Phase 1 to A3 New Residential Phase 2 by way of Councillor Motion under Section 12 (5) of the Planning and Development Act 2000 (as amended).

The Planning Authority will also continue to monitor the lands zoned 'A2 - New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'A2 - New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'A3 - New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

In response to submission MA057 from the Office of the Planning Regulator, it is proposed to include additional text within Section 13.9.6 of the Plan which sets out the criteria required to be satisfied prior to the release of any lands identified as 'A3 – New Residential Phase 2'. This provides for flexibility in the event of insufficient lands zoned 'A2 – New Residential Phase 1' being developed out.

Whilst it is acknowledged the subject lands are in proximity to existing services and facilities adjacent to existing residential neighbourhoods at Castleguard the quantum of residential lands in Phase 1 needs to be aligned with the housing demand in each settlement. Taking into account the excess of residential lands in Ardee it is considered appropriate to retain the proposed zoning of the subject lands as 'A3 New Residential – Phase 2.' There will be an opportunity to review this land use zoning as part of the preparation of the Ardee Local Area Plan.

Chief Executive's Recommendation:

No Change

Submission No.

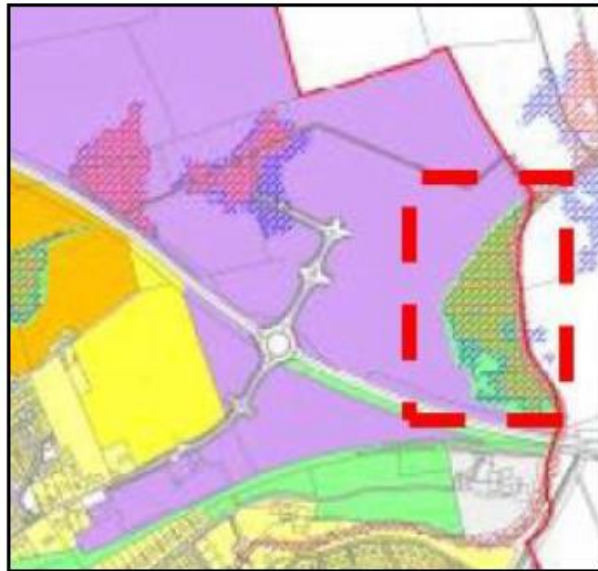
LCDP MA053

Submitted by:

Moffett Property Management Ardee Ltd.

Summary of Submission:

This submission seeks that the proposed material alteration to change the zoning from 'E1 General Employment' to 'H1 Open Space' is not adopted and that the E1 General Employment zoning as per the draft Plan is adopted (ARD7).



The submission details live planning applications on this site (P.A. Ref. 20/749 & P.A. Ref. 09/509, as extended under P.A. Ref. 20/135 until 27-05-2025).

It is submitted that there is no justification for allowing site 2 and 3 to be zoned E1 with development subject to site specific FRA and not site 4. As quoted above, the Justification Test refers to the “peripheral location” of the site. The submission lands are an integral part of the existing planning permission on site which includes lands referred to in the assessment of Site 3 under P.A. Ref. 20/279. It is strongly suggested that there is no difference in the position of Site 2 and Site 4 in terms of proximity to Ardee given that they are accessed via the same road network which connects to the N33 to the south. The parent permission P.A. Ref. 09/905 which has been extended in duration to 2025 and includes the lands under P.A. Ref. 20/749 was subject to EIA and included a comprehensive surface water design including SUDS methods.

The submission is accompanied by a flood risk review prepared by Finn Design Partnership attached at Appendix A. The area proposed to be zoned H1 Open Space does not accurately reflect the predicted flood levels for this site.

Chief Executive's Response:

The zoning change from E1 General Employment to H1 Open Space was in direct response to the Office of Public Works (OPW) submission to the Draft Plan. All mapping of zoned land within each of the settlements has been assessed in line with the sequential approach and subject to justification tests as per the requirements of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009).

In this instance the lands are vulnerable to flooding and are affected primarily by Flood Zone A (and limited Zone B), wherein the uses generally permitted within this land use category are not appropriate. The criteria for passing the Justification Test were not met in this instance and it was recommended that the lands were re-zoned to 'Open Space'.

Chief Executive's Recommendation:

No Change

Submission No.

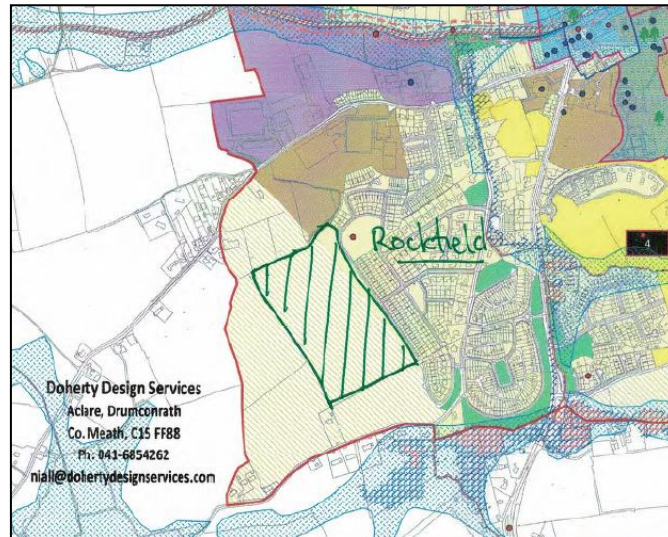
LCDP MA020

Submitted by:

Niall Doherty

Summary of Submission:

A number of reasons are made as to why these lands should be changed from Strategic Reserve to Category A2 New Residential.



In support:

- Originally the Rockfield Housing Estate extended to an imaginary line on mapping which was drawn years ago when it was suggested that the N2 national road passing through the town could be diverted west of the town. Clearly this has long since passed and on this basis it is considered that the imaginary line is irrelevant.
- Zoned New Residential land has failed to be developed. The choice on where towns people want to live is very restrictive due to the lack of development on these zoned lands.
- Contrary to the Infrastructure Assessment of the lands noted in the Chief Executive's Response on the original submission, these lands are fully serviceable with sewers, surface water drains, watermains, public utilities and a road network all adjacent to the site and ready to go for immediate construction.

Chief Executive's Response:

The issues raised in the submission do not relate to a Material Alteration of the Draft Plan. Therefore in accordance with Section 12(7)(ad)(ii) this submission cannot be considered.

Chief Executive's Recommendation:

No Change

Section 4 (ii)

Chief Executive's
Summary, Response
and Recommendation
on Zoning Submissions
Dunleer

Submission No.

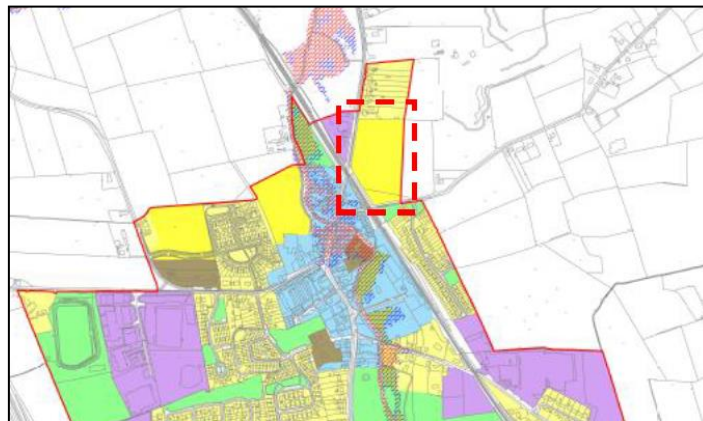
LCDP MA023

Submitted by:

Bellscape Ltd.

Summary of Submission:

This submission seeks the reinstatement of the lands identified as **DLR2** – Lands north of Mountain View Road and east of the R132 to Rural Protection Zone from the A2 Residential zoning.



The amendment cannot reasonably, logically and/or rationally be considered as being in compliance with Section 12(11) of the Planning and Development Act 2000. Expresses grave concern that the availability of crucial information has been delayed to allow this submission to be made based on all relevant information. Notes that CE recommended no change to the zoning from that contained in the draft Plan.

The submission notes the planning history on the DLR3 lands.

The updated IALUE for Dunleer makes no reference to the site proposed under DLR2 of the material alterations while DLR3 ranked by far the best of the three site assessed in Dunleer. It is submitted that the Elected Members did not take into account the proper planning and sustainable development of the area as they are obliged to under Section 12(11) of the Act.

It is strongly contended that removing the site with the best IALUE assessment (DLR3) cannot be justified in terms of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies for the time being of the Government or any Minister of the Government.

Serious questions arise regarding the SEA for the proposed material alterations and how, the SEA as undertaken for these lands.

Chief Executive's Response:

The lands identified in DLR 2 were rezoned from Rural Policy Zone 2 to A2 New Residential Phase 1 by way of Councillor Motion under Section 12 (5) of the Planning and Development Act 2000 (as amended). To ensure that the overall quantum of residential land in Dunleer was not increased the lands at DLR 1 were removed from the settlement boundary and lands at DLR 3 were zoned to H1 Open Space. The aggregate total of lands at DLR 2 and 3, does not exceed that total of the lands removed under DLR 1 thus the zoning of both sites as residential will not increase the overall quantum of residential land zoned in Dunleer.

It is acknowledged that an assessment of DLR 2 lands was not carried out in the updated Infrastructure Assessment and Land Use Evaluation (IALUE). Nonetheless, the Council is satisfied the lands at DLR 2 can be serviced and are located in close proximity to Dunleer town centre and within walking distance of schools, services and facilities. The Council is also satisfied that both sites contribute to a consolidated pattern of development and the creation of a compact and sustainable settlement.

Furthermore, an objective of the Dunleer Local Area Plan 2017-2027 is the development of a Riverside Amenity Park in conjunction with the provision of high quality, low density housing on the DLR 3 lands. The aforementioned park will provide a social, recreation and heritage benefit to both Dunleer and the wider area catchment. There have also been numerous applications on the site; planning references 05/863 18/360 19/212 and 20/707. The latter permission 20/707 is currently under consideration by An Bord Pleanála.

Taking the foregoing into account it is considered that A2 Residential Phase 1 is the most appropriate zoning for lands identified in DLR 2 and DLR 3.

Chief Executive's Recommendation:

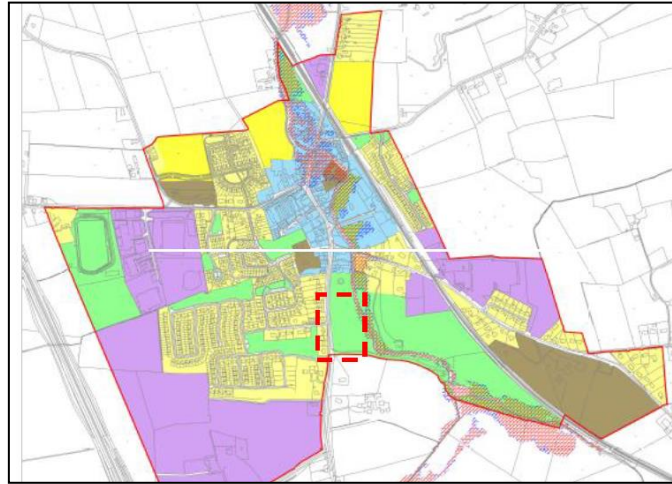
No change in relation to DLR2

It is recommended that proposed Material Alteration DLR 3 is not included as a Material Alteration to the Draft Plan and the zoning for these lands reverts back to that as proposed in the Draft County Development Plan i.e. A2 New Residential Phase 1.

Please refer to Appendix 1 for details of the mapping changes associated with this recommendation.

Summary of Submission:

This submission seeks that proposed material amendment **DLR3** – Lands south of the Motte, Dunleer to rezone these lands from Residential A2 – Phase 1 to H1 Open Space is not adopted and that the lands retain their A2 Residential zoning in the adopted Plan.



The amendment cannot reasonably, logically and/or rationally be considered as being in compliance with Section 12(11) of the Planning and Development Act 2000. Expresses grave concern that the availability of crucial information has been delayed to allow this submission to be made based on all relevant information. Notes that CE recommended no change to the zoning from that contained in the draft Plan.

The submission notes the planning history on the DLR3 lands.

The updated IALUE for Dunleer makes no reference to the site proposed under DLR2 of the material alterations while DLR3 ranked by far the best of the three site assessed in Dunleer. It is submitted that the Elected Members did not take into account the proper planning and sustainable development of the area as they are obliged to under Section 12(11) of the Act.

It is strongly contended that removing the site with the best IALUE assessment (DLR3) cannot be justified in terms of the proper planning and sustainable development of the area the statutory obligations of any local authority in the area and any relevant policies for the time being of the Government or any Minister of the Government.

Serious questions arise regarding the SEA for the proposed material alterations and how, the SEA as undertaken for these lands.

The submission points out that Material Amendment DLR 3, if adopted, would be in direct conflict with Section 2.4.3 of the Dunleer Local Area Plan 2017-2023 which includes a specific objective to develop the site (identified as the “Dublin Road” site) in conjunction with a riverside park.

Chief Executive's Response:

The lands identified in DLR 2 were rezoned from Rural Policy Zone 2 to A2 New Residential Phase 1 by way of Councillor Motion under Section 12 (5) of the Planning and Development Act 2000 (as amended). To ensure that the overall quantum of residential land in Dunleer was not increased the lands at DLR 3 were zoned H1 Open Space and the lands at DLR 1 removed from the settlement boundary. The total extent of land de-zoned under DLR 1 exceeds the combined total of DLR 3 and 2, thus the re-zoning of the submission lands (DLR3) will not increase the overall quantum of residential land zoned in Dunleer.

The site (DLR 3) is located in close proximity to Dunleer town centre and within walking distance of schools, services and facilities. Its development will contribute to a consolidated pattern of development and the creation of a compact and sustainable settlement. The Land Evaluation and Infrastructure Assessment which was carried at Draft Plan stage identified the submission lands as a 'more optimal location for development'.

Furthermore, an objective of the Dunleer Local Area Plan 2017-2027 is the development of a Riverside Amenity Park in conjunction with the provision of high quality, low density housing on the submission lands. The aforementioned park will provide a social, recreation and heritage benefit to both Dunleer and the wider area catchment.

There have been numerous applications on the site; planning references 05/863 18/360 19/212 and 20/707. The latter is presently under consideration by An Bord Pleanála.

Based on the above it is considered that A2 Residential Phase 1 is the most appropriate zoning for the site.

Chief Executive's Recommendation:

It is recommended that proposed Material Alteration DLR 3 is not included as a Material Alteration to the Draft Plan and the zoning for these lands reverts back to that as proposed in the Draft County Development Plan i.e. A2 New Residential Phase 1.

Please refer to Appendix 1 for details of the mapping changes associated with this recommendation.

Section 4 (ii)

Chief Executive's
Summary, Response
and Recommendation
on Zoning Submissions
Sandpit

Submission No.

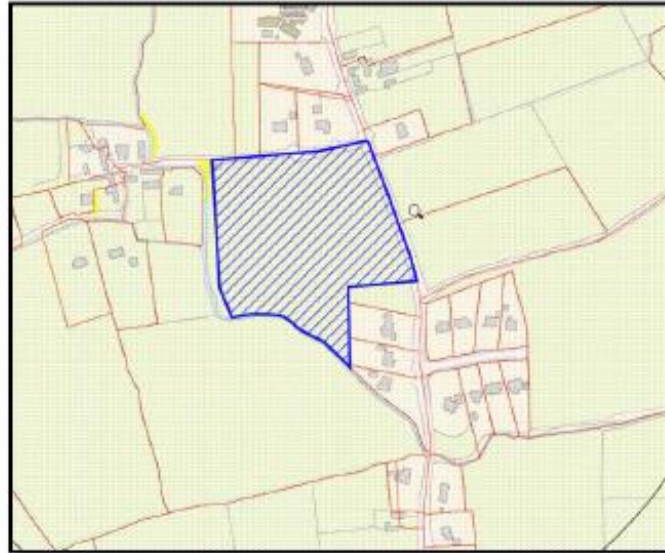
LCDP MA022

Submitted by:

Lorrac Developments Ltd, Thomas Meegan, Rita Meegan, Imelda McGuinness and Clare McGovern

Summary of Submission:

The submission concerns lands to the south of Sandpit



Since 2006 the client has been actively trying to develop those lands and sets out the planning history. The scope of the flood modelling prepared has been extended and an approach has been developed and the engineering section of the council agree that it is possible to effectively deal with the historical flood issues. An application was in the process of being prepared for lodgement when the Draft County Development Plan was published. It is respectfully requested that the proposed Material Amendment L5-13 be dropped and that the client's land remain within the settlement boundary.

In support:

- The omission of the lands subject to MA L5-12 is not sought as Sandpit, with a primary school and shops within the village can support limited residential expansion over the course of the plan period, and that such opportunities represent a more sustainable way of addressing rural housing needs than building in the open countryside.
- The decision may not have been made if the extensive efforts that have been made to develop their land holding over a protracted period since 2006 were known.
- There is no need to remove land from a Level 5 settlement boundary in order to add an additional portion of land. Inclusion within a Level 5 boundary is not the same as A2 zoning which would have core strategy and phasing implications. Lands inside a L5 settlement and outside it dip into the same unit allocation from a core strategy point of view.

Chief Executive's Response:

The subject lands under Material Alteration no. L5-12 are proposed to be included within the boundary of Sandpit with the subject lands under Alteration L5-13 to be removed. The lands under Material Alteration L5-13 were proposed to be removed in order to ensure the quantum of lands within the boundary of Sandpit would not be increased.

This response should be read in conjunction with the response to MA Recommendation 4 of the OPR submission.

Under the Draft Plan the Class 2 Road, L-6303-0 provides a definitive boundary to Sandpit.

The subject lands under Material Alteration no. L5-12 are brownfield and considered to be more appropriately located. It is therefore recommended that the Material Alteration no's L5-12 and L5-13 are not carried and the boundary change for Sandpit reverts back to that as proposed in the Draft County Development Plan.

Chief Executive's Recommendation:

It is recommended that proposed Material Alterations L5-12 and L5-13 are not included as material alterations to the Draft Plan and the boundary of Sandpit reverts back to that as proposed in the Draft County Development Plan i.e. the lands in L5-12 located in Rural Policy Zone 2 and the lands in L5-13 located within the boundary of Sandpit.

Please refer to Appendix 1 for details of the mapping changes associated with this recommendation.

Section 4 (iii)

Chief Executive's Summary, Response and Recommendation on RPS Submissions

Submission No.

LCDP MA042

Submitted by:

Urban Life (GSD) Limited

Summary of Submission:

This submission seeks that material amendment 212 is not adopted.

It is submitted that this proposed material alteration cannot reasonably, logically and/or rationally be considered as being in compliance with Section 12(11) of the Planning and Development Act 2000 as amended. Expresses grave concern that crucial information is not available to allow this submission to be made based on all relevant information, and especially with respect to Section 12(11) of the Act.

The recommendation of the Chief Executive on the proposal of the Residents' Association to add the walls to the RPS is very clear. It states "Chief Executive's Recommendation – No Change".

The submission notes that the CE assessment referenced a report from a conservation architect. This report assesses the proposal under each of the above headings and finds that the structure is not considered to be of interest under any of the categories.

As noted Urban Life (GSD) Ltd has lodged a planning application for an apartment development on the north side of the entrance to Trinity Gardens and west of George's Street. As part of this planning application, the applicant commissioned a Grade 1 Conservation Architect firm, David Slattery and Associates to undertake an assessment of built heritage aspects of the proposed development. This Report, as with the Report of Mr. Hamilton, confirms there are no items of built heritage on the site (the report prepared by Slattery and Associates is submitted with the submission).

It is submitted that the proposed material amendment 212 for the inclusion of the walls at Trinity Gardens on the RPS should not be adopted. We believe there is no evidence-based justification for the adoption of proposed material amendment 212 and furthermore that the procedures used to bring forward this material amendment are ultra vires and fundamentally flawed.

We are not in a position to make a full and comprehensive submission as the minutes of the meetings will not be available until the 19th July at the earliest and the timeframe for making submissions on the proposed material amendments expires at 4pm on 28th July.

It seems that no account was taken of the Architectural Heritage Protection Guidelines in reaching the decision to move forward with proposed material amendment 212.

If this material amendment is adopted it will set an extremely dangerous precedent in terms of the proper protection of the architectural heritage of the County. The proposed material amendment to add the walls to the RPS is no more than a thinly veiled attempt to impede and try and get planning application 21/396 refused.

Chief Executive's Response:

The Council are satisfied that the appropriate procedures were followed with regard to the proposal to add the Entrance Walls, Railings, and nameplate at Trinity Gardens, Drogheda, as set out in proposed Material Alteration 212, to the Record of Protected Structures.

The Conservation Assessment by David Slattery and Associates included in the submission is noted.

The Council remains of the opinion that while the entrance walls, railings and name plate form an interesting access way from the heavily used roadway to a more domestic scale residential area they are not considered of special interest and as such are not considered worthy of inclusion in the Record of Protected Structures.

Chief Executive's Recommendation:

Do not include the entrance walls, railings and name plate at Trinity Gardens within the Record of Protected Structures.

Submission No.

LCDP MA043

Submitted by:

Urban Life (GSD) Limited

Summary of Submission:

We strongly contend that the 'Protected Structure' Notice is ultra vires, illegal and is fatally flawed and request on behalf of our client that the Notice is formally withdrawn forthwith and our client notified accordingly.

It is Urban Life's position that it was ultra vires the members to propose such an amendment, as the Act does not make specific provision for such an amendment at this stage of the process.

To the extent that the said notice is validly issued, which is denied, Section 12(3)(a) sets out very specific requirements and timeframes and yet the content of the Notice does not adhere to any of these requirements.

The Notice does not take the form of a formal notice signed by the Chief Executive and issued under an Order of the Chief Executive.

Expresses grave concern that crucial information is not available to allow this submission to be made based on all relevant information, and especially with respect to Section 12(11) of the Act.

The recommendation of the Chief Executive on the proposal of the Residents' Association to add the walls to the RPS is very clear. It states "Chief Executive's Recommendation – No Change".

The submission notes that the CE assessment referenced a report from a conservation architect. This report assesses the proposal under each of the above headings and finds that the structure is not considered to be of interest under any of the categories.

As noted Urban Life (GSD) Ltd has lodged a planning application for an apartment development on the north side of the entrance to Trinity Gardens and west of George's Street. As part of this planning application, the applicant commissioned a Grade 1 Conservation Architect firm, David Slattery and Associates to undertake an assessment of built heritage aspects of the proposed development. This Report, as with the Report of Mr. Hamilton, confirms there are no items of built heritage on the site (the report prepared by Slattery and Associates is submitted with the submission).

Any record of the proposed addition should be deleted, as to have such even if withdrawn, lurking in the background could have serious financial implications.

It is apparent no account was taken of the Architectural Heritage Protection Guidelines in reaching the decision to add the structure.

If this material amendment is adopted it will set an extremely dangerous precedent in terms of the proper protection of the architectural heritage of the County.

We are of the opinion that the proposed addition (DB402) to the RPS is no more than a thinly veiled attempt to impede and try and get planning application 21/396 refused.

Client wishes to state he reserves his right in all regards with respect to this matter.

Chief Executive's Response:

The Council are satisfied that the appropriate procedures were followed with regard to the proposal to add the Entrance Walls, Railings, and nameplate at Trinity Gardens, Drogheda, as set out in proposed Material Alteration 212, to the Record of Protected Structures.

As set out in the response and recommendation to submission MA 042 it is not proposed to include the entrance walls, railings and name plate at Trinity Gardens within the Record of Protected Structures.

Chief Executive's Recommendation:

Do not include the entrance walls, railings and name plate at Trinity Gardens within the Record of Protected Structures.



Section 4 (iv)

Chief Executive's
Summary, Response
and Recommendation
on General Submissions

Submission No.

LCDP MA006

Submitted by:

Declan Byrne

Summary of Submission:

The submission relates to Monasterboice which has not nor will not be selected as one of Ireland's candidates for the Tentative World Heritage status. Whilst there are three protection rings, it is the third ring which is extensive and effectively rules out development, based on the site's designated Tentative World Heritage status, which no longer applies. The 3rd ring should be removed or reduced to reflect the changed status allowing for a fair balance between maintaining heritage and allowing people live in the area.

Chief Executive's Response:

The issues raised in the submission do not relate to a Material Alteration of the Draft Plan. Therefore in accordance with Section 12(7)(ad)(ii) of the Planning and Development Act 2000 (as amended) this submission cannot be considered.

Chief Executive's Recommendation:

No Change

Submission No.'s LCDP MA013, MA015, MA017, MA018, MA019, MA025, MA026, MA027, MA028, MA030, MA033, MA034, MA035, MA036, MA047, MA048, MA049, MA050, MA051, MA052, MA059, MA060, MA062, MA066

Submitted by: Michael O'Dowd (Aontú), David Griffiths, Cyril Carter, Jack Traynor, David Dennis, Graham Woods, Lisa Browne, Ian Craig, Joe Rogers, Ronan Farrelly, Aiden Torris, Cllr. Dolores Minogue, Laura Torris, Margaret Daisy Mathews, Jim Gartland, Paddy McQuillan, Deirdre McQuillan, Jerry O'Connell, Fiona Lynch, Leonard J. Hatrick, Brian Harratty, Sylvia McCann, Ciara Mac Cormac, Anna McKenna

Summary of Submission:

These submissions seek a reversal/alteration to Alteration 91 / Chapter 7

- The removal of specific locations in the Development plan and in particular the removal of the stated aim of reopening Dunleer Railway station is a regressive step for public transport in County Louth.
- Reopening of Dunleer will lead to a better commuter service within Louth.
- That Dunleer Railway line is mentioned in name as an objective to the Development Plan as a railway line that will be – ‘improve rail service for Mid Louth and in particular to seek to examine the feasibility of reopening the rail way station in Dunleer’.
- Second train station is required in North Drogheda.
- Identifying the stations gives additional planning protection to locations and makes it possible to raise funds through levies for these facilities.
- Transport policy should be focussed on people using public transport and not all using their cars, adding to congestion and the overall national output of carbon.
- Believe that a new station is required in South Dundalk to serve the College and the new industries.
- Request to revert to/restore original text which referred to ‘re-opening the rail station in Dunleer and providing additional new rail stations for south Dundalk, north Drogheda, and the mid-Louth area’.

Chief Executive's Response:

The National Transport Authority submission (LCDP DR 089) to the Draft Louth County Development Plan 2021-2027 stated that there is no funding available for additional rail stations outside the scope of the Dart +. Therefore there is no funding currently available for rail stations in North Drogheda, Dunleer, or South Dundalk. Furthermore whilst Dunleer is identified as a Self-Sustaining Growth Town, based on the population levels it is not clear that the provision of an additional rail station would be warranted.

Whilst the Council support the improvement of rail services in the County these improvements can only be provided in accordance with national policy. These infrastructure projects are set out in the National Development Plan Project Ireland 2040.

Having regard to the lack of funding and the absence of any reference to the re-opening of Dunleer Rail Station or provision for any additional rail stations in the County in the National Development Plan it is considered appropriate that MOV 14 be amended as set out in Material Alteration 91.

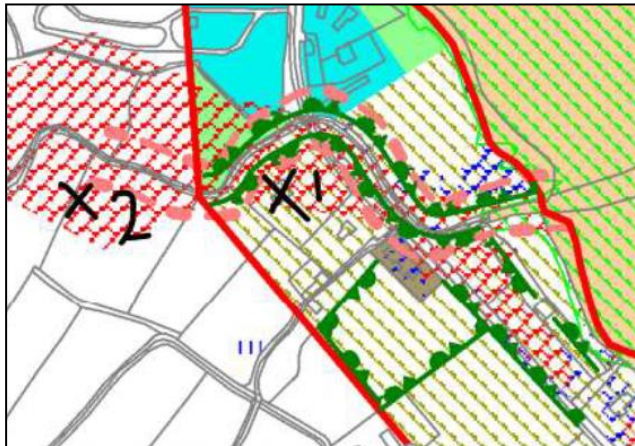
Chief Executive's Recommendation:

No Change

Submission No.	LCDP MA041
Submitted by:	Bernice Mee

Summary of Submission:

My property is shown as part of the flood zone A. This is inaccurate, as the Carlingford side of the Ryland at this point is higher than the Omeath side of the river. The flood zone shown inside the black circle does not experience flooding.



My property at Ballinteskin, Omeath. Our house is elevated and was inspected by our current insurance company and was described as approx. 7 metres above the level of the Ryland river. In all my years, I have never seen this land flood. I am requesting that the above lands be removed from flood plain.

Chief Executive’s Response:

Flood zones as identified on the maps are derived from datasets provided by the Office of Public Works and as such are not determined by the Council.

In any event, the issues raised in the submission do not relate to a Material Alteration of the Draft Plan. Therefore in accordance with Section 12(7)(ad)(ii) this submission cannot be considered.

Chief Executive's Recommendation:

No Change

Submission No.

LCDP MA055

Submitted by:

RWE Renewables Ireland Ltd

Summary of Submission:

RWE supports Louth County Council's Section 5.19.2 & Material Alteration No. 61. RWE also supports comments made in Section 5.19 of the draft plan which highlight that 33.9% of the population of Louth live in rural areas. RWE commend Louth County Council on recognizing the importance of energy infrastructure to the counties development.

Firstly RWE would question Material Alteration No. 137 which sees the omission of text which highlights various targets as set out in the National Renewable Energy Action Plan (NREAP) and the National Energy Efficiency Action Plan (NEEAP). While 2020 has passed, maybe the inclusion of more relevant figures ought to be included. There is a lack of county specific targets for Louth addressed here.

RWE commend Louth on the good intentions, and on Material Alteration No. 147 which states the RES will be prepared within 1 year of the adoption of the Revised Wind Energy Guidelines. RWE would request that Louth provide a specific date should the Revised Wind Energy Guidelines continue to be delayed.

RWE want to highlight and commend Louth County Council on the inclusion of Material Alteration No. 140. Again however, RWE would like Louth County Council to provide specific dates on the production of the Renewable Energy Strategy (RES) and within that most importantly of all that specific targets ought to be set out for Louth in terms of their contributions to producing renewable energy.

RWE support the inclusion of a new policy objective as per Material Alteration No. 172.

Chief Executive's Response:

Support for the Material Alterations proposed is noted and welcomed by Louth County Council. Inclusion of specific targets for County Louth regarding contributions to renewable energy is dependent on the production of the proposed Renewable Energy Strategy (RES) the timeline of which is ear marked for delivery within one year of adoption of the revised Wind Energy Guidelines. The RES will establish baseline data and set out the renewable energy resource targets for the County to 2027, seeking a sustainable balance of renewable energy sources.

Chief Executive's Recommendation:

No Change

You are also referred to response to MA Recommendation 9 of the OPR submission which relates to Renewable Energy.

Submission No.	LCDP MA067
Submitted by:	Social Enterprise Republic of Ireland (SERI)

Summary of Submission:

The submission outlines the role and background to Social Enterprise Republic of Ireland (SERI). The submission outlines that the following items should be included as key commitments in the future Louth County Development Plan:

- A commitment to facilitate, enable and support the development of a vibrant Social Enterprise sector, as a valuable and important component of the overall Economic Development vision.
- A commitment to work with Social Enterprises to access and develop appropriate fit for purpose land and buildings as spaces to enable development and growth of new services and products.
- A commitment to include Social Clauses in Public Procurement.
- A commitment to identify and disseminate best practice local examples of social enterprises and increase public understanding of their contribution to society and the economy.

Chief Executive's Response:

The issues raised in the submission do not relate to a Material Alteration of the Draft Plan. Therefore in accordance with Section 12(7)(ad)(ii) this submission cannot be considered.

Chief Executive's Recommendation:

No Change

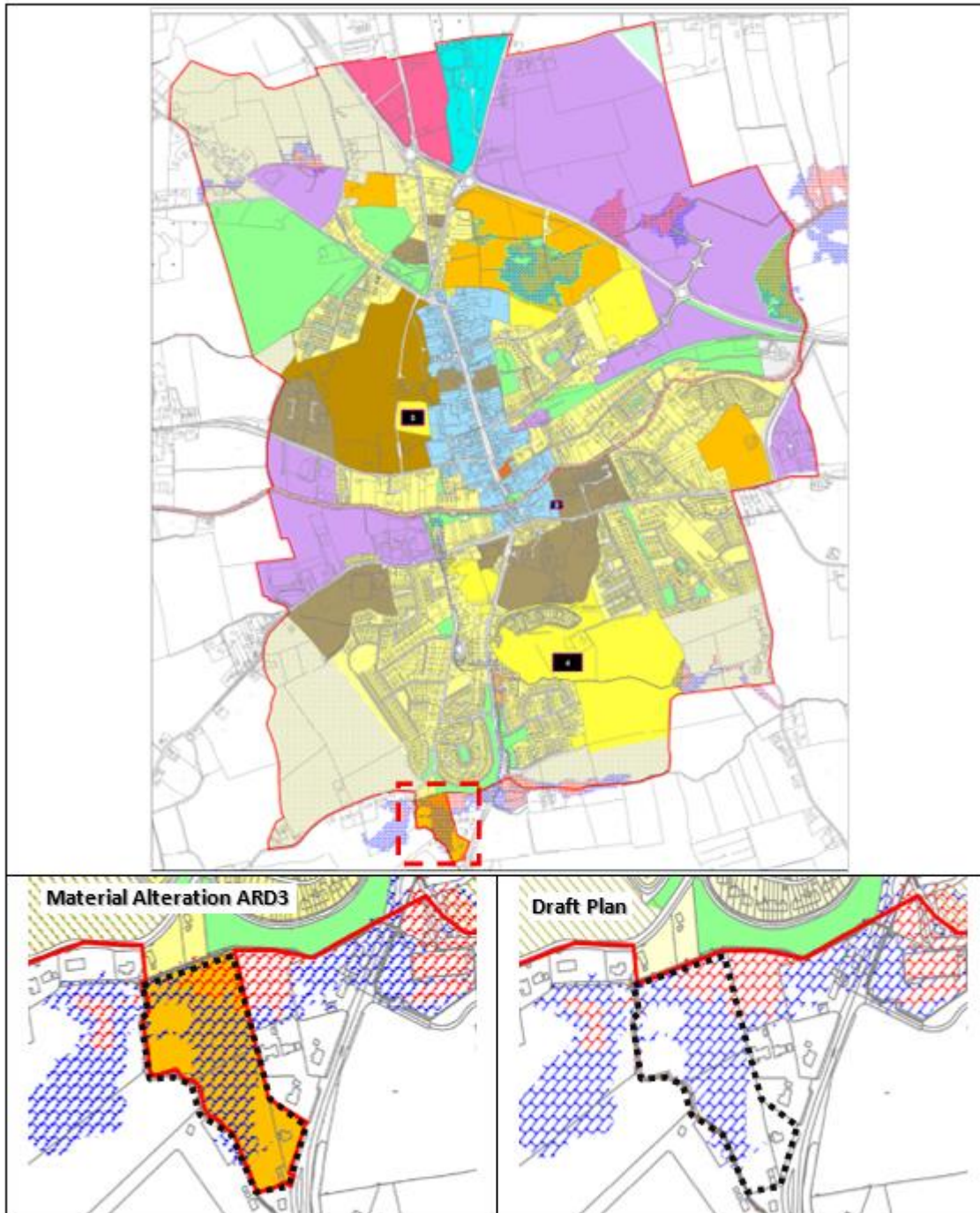


Appendix 1

Mapping Changes

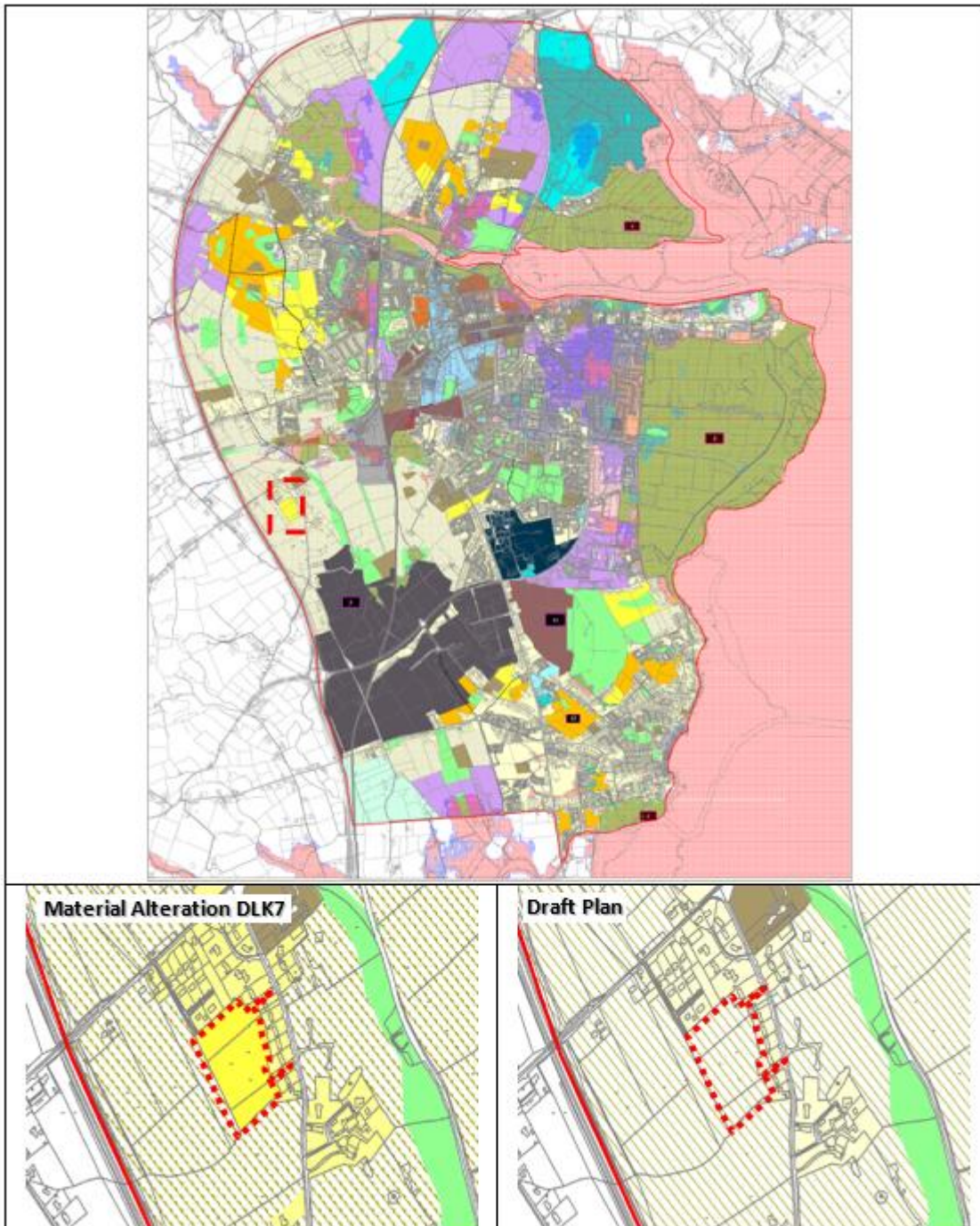
Response to MA057

It is recommended that ARD3 is not included as a Material Alteration and this land reverts back to that as proposed in the Draft Plan i.e. 'Rural Policy Zone 2'.



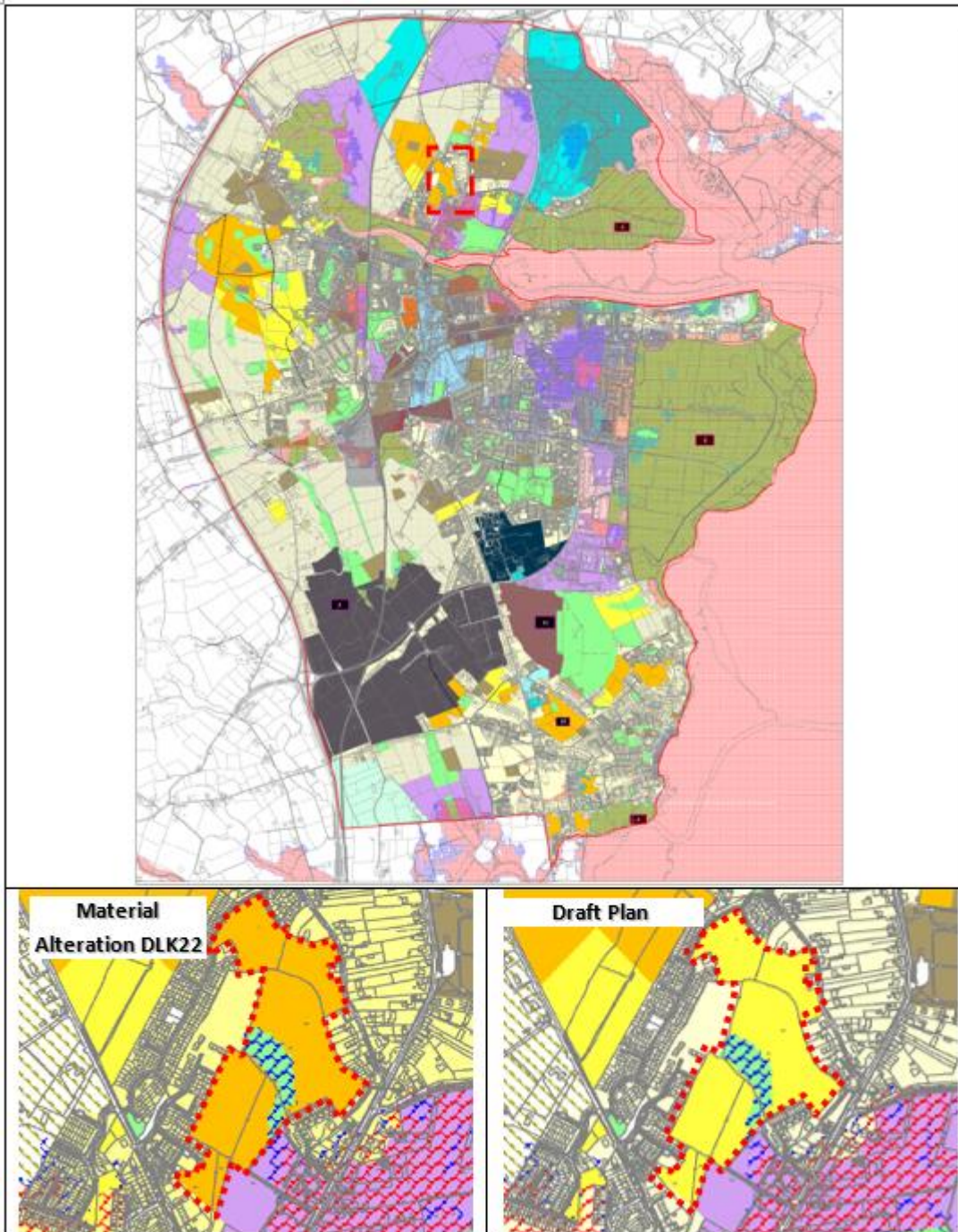
Response to MA057

It is recommended that DLK 7 is not included as a Material Alteration and this zoning reverts back to that as proposed in the Draft Plan i.e. L1 Strategic Reserve.



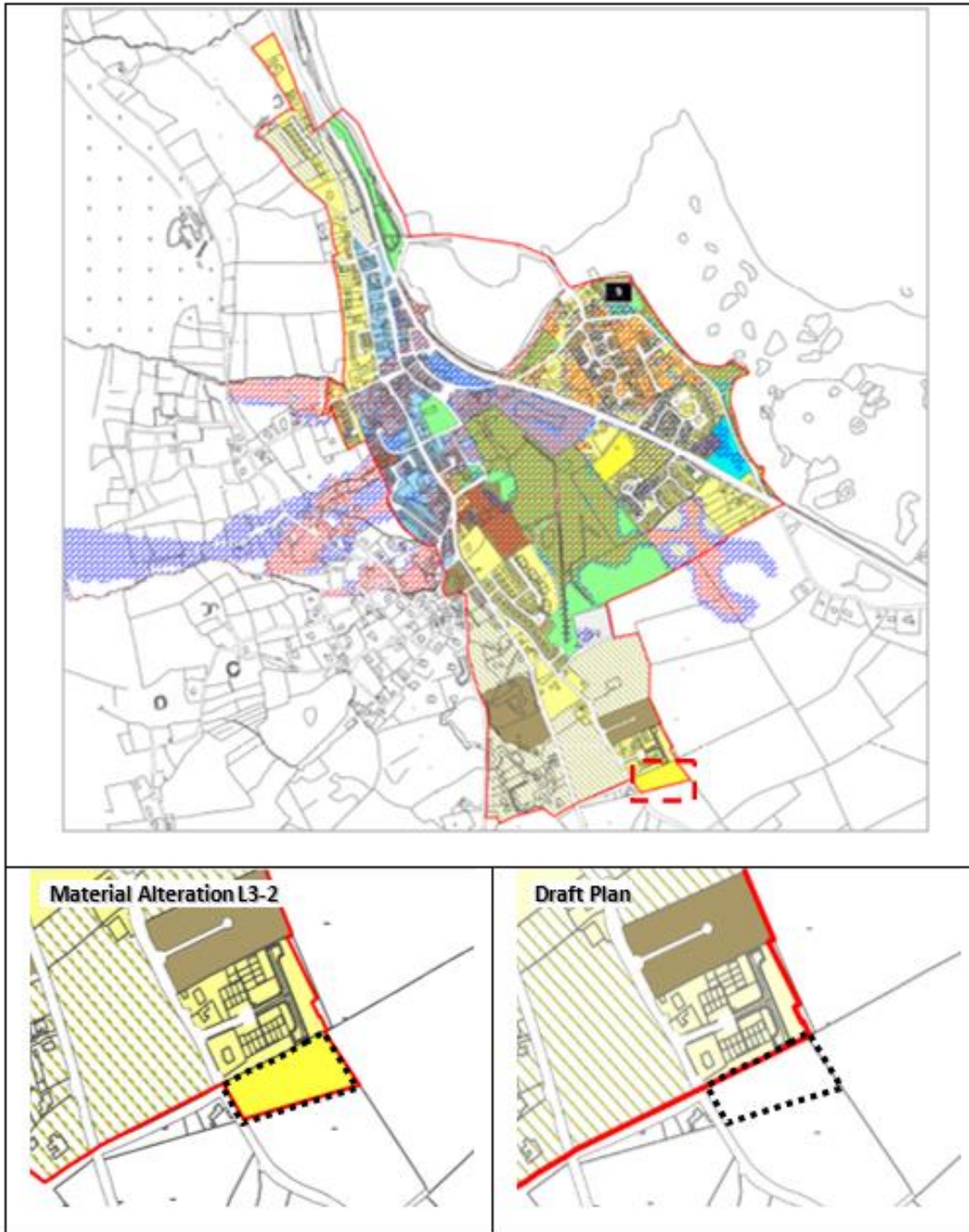
Response to MA057

It is recommended that DLK 22 is not included as a Material Alteration and this zoning reverts back to that as proposed in the Draft Plan i.e. 'A2 New Residential – Phase 1'.



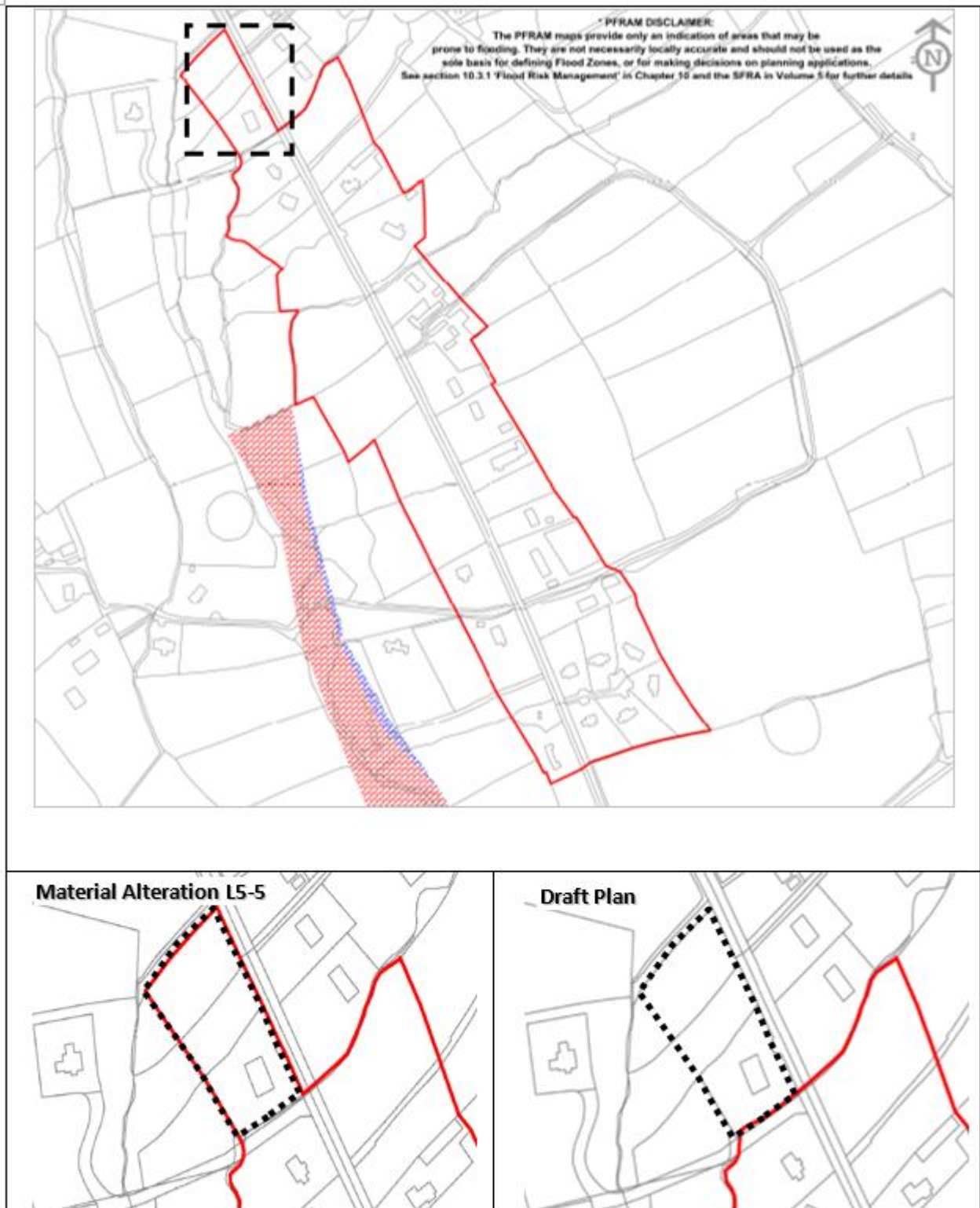
Response to MA057

It is recommended that L3-2 is not included as a Material Alteration and this land reverts back to that as proposed in the Draft Plan i.e. 'Rural Policy Zone 2'.



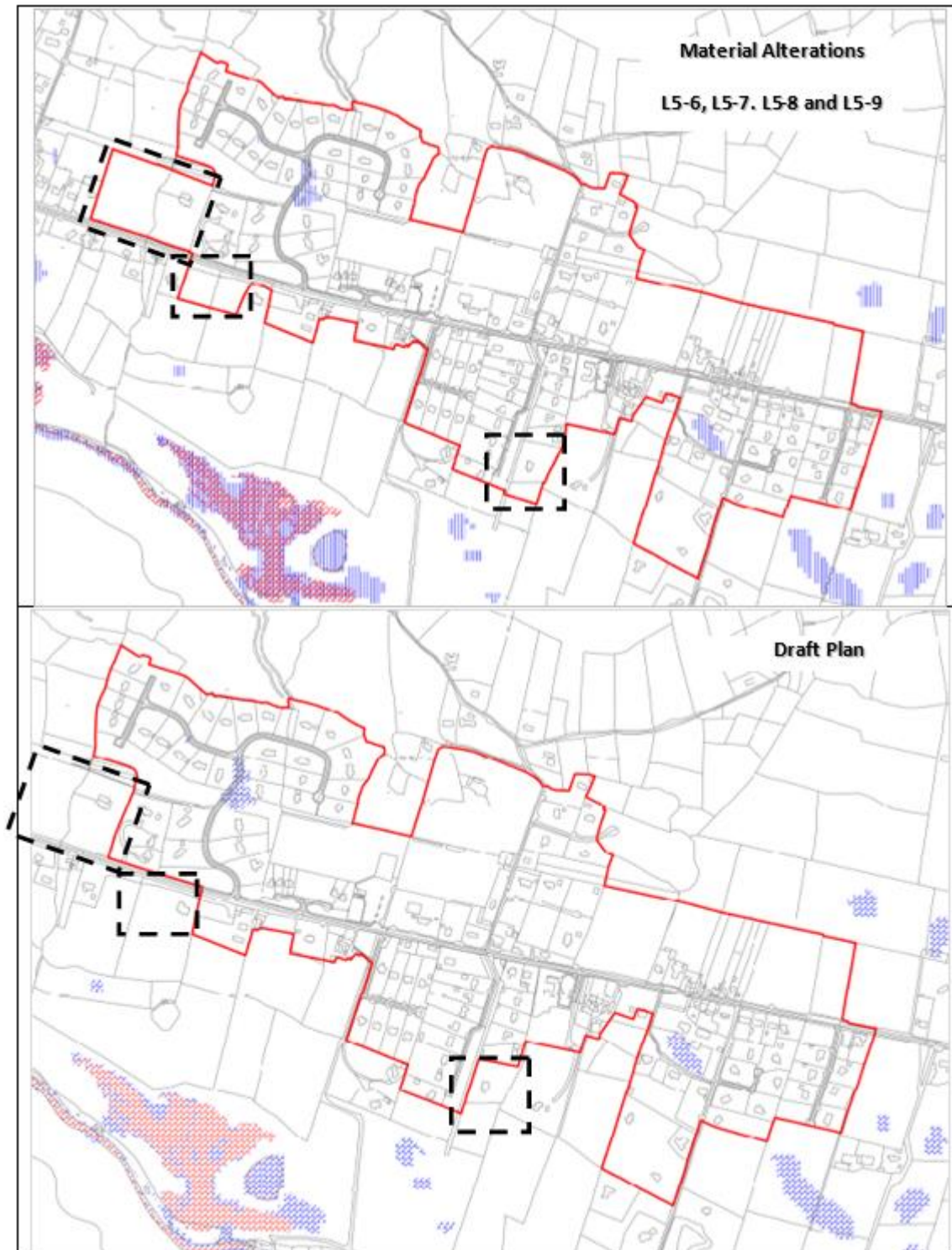
Response to MA057

It is recommended that L5-5 is not included as a Material Alteration and this land reverts back to that as proposed in the Draft Plan i.e. 'Rural Policy Zone 1'.



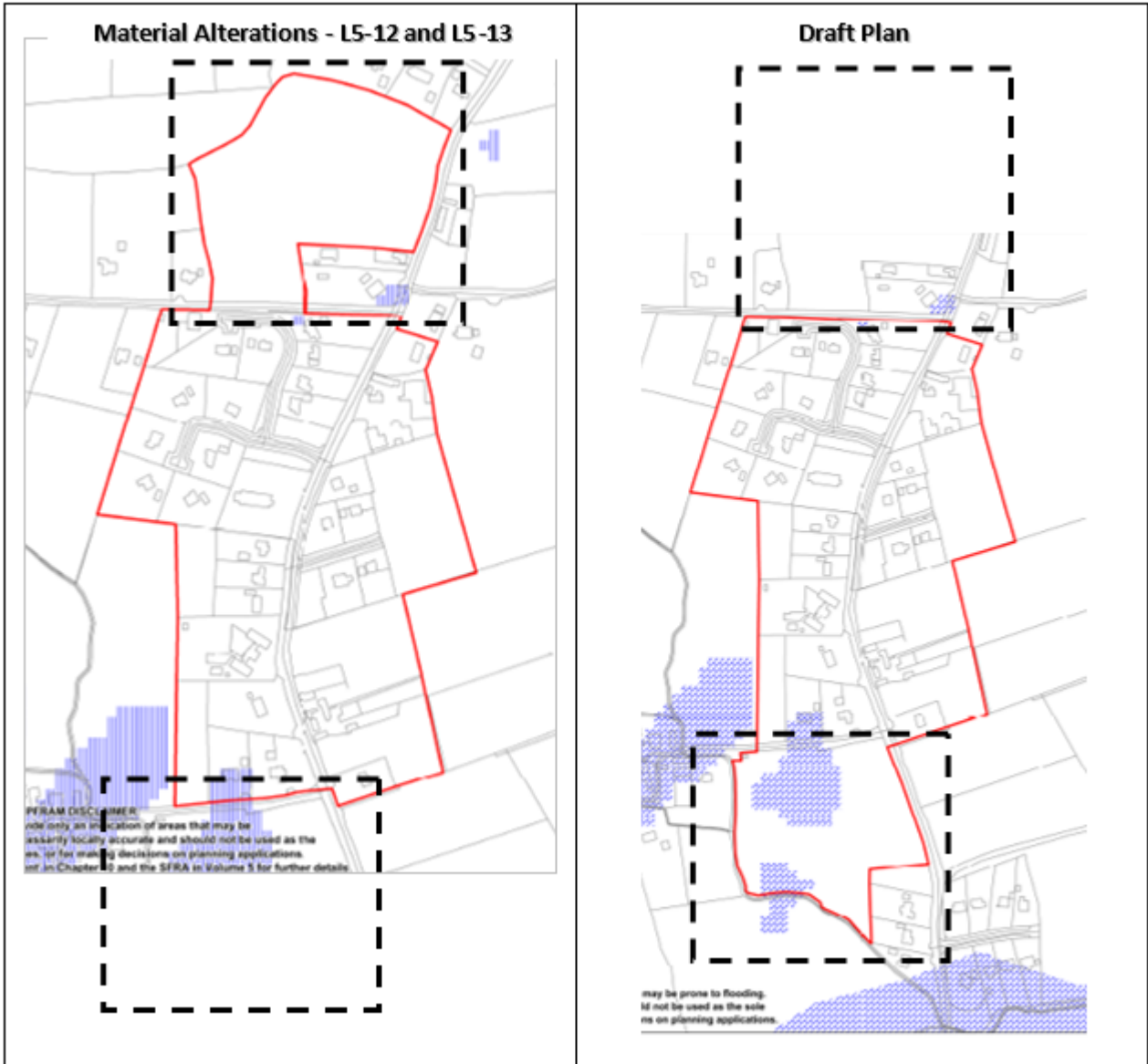
Response to MA057

It is recommended that L5-6, L5-7, L5-8 and L5-9 are not included as a Material Alteration and this land reverts back to that as proposed in the Draft Plan i.e. 'Rural Policy Zone 1' and 'Rural Policy Zone 2' as applicable.



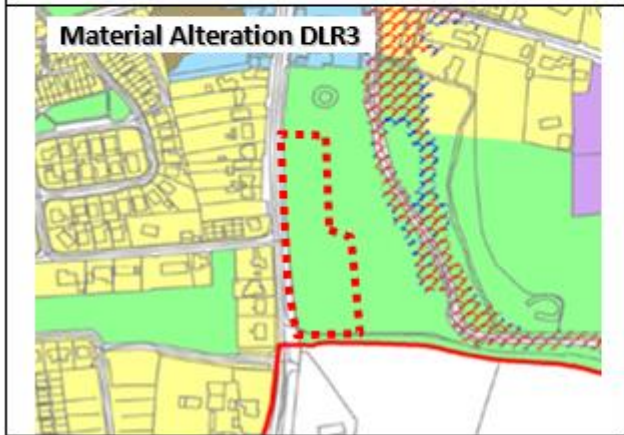
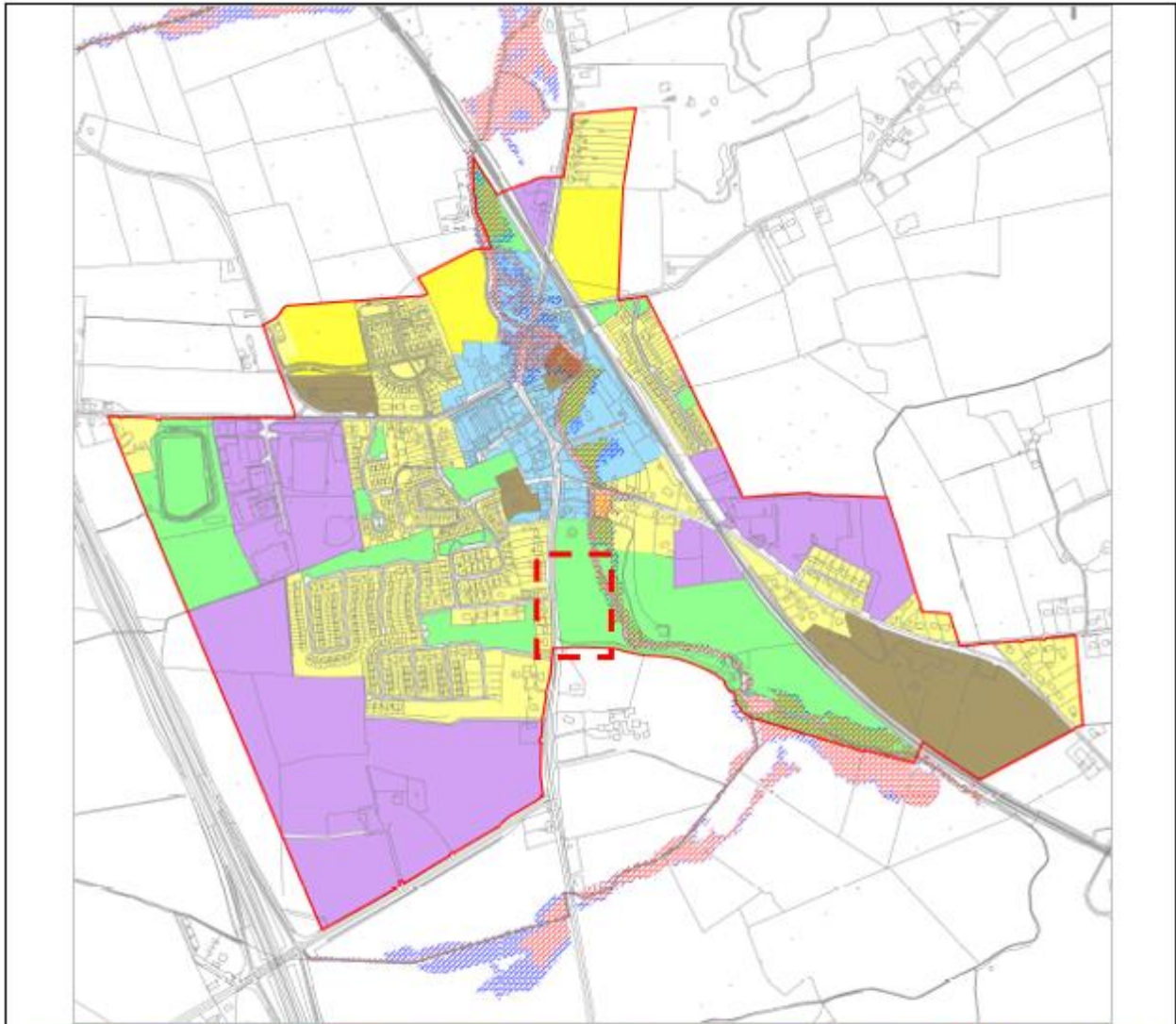
Response to MA057

It is recommended that proposed Material Alterations L5-12 and L5-13 are not included as material alterations to the Draft Plan and the boundary of Sandpitt reverts back to that as proposed in the Draft County Development Plan.



Response to MA023 and MA024

It is recommended that the proposed Material Alteration DLR3 is not included as a Material Alteration to the Draft Plan and the zoning for these lands reverts back to that as proposed in the Draft County Development Plan i.e. A2 New Residential Phase 1.





Appendix 2

Updated Core Strategy Table

Table 2.15: Updated Core Strategy Table

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M
Settlement Category	Settlement	Population 2016	Projected Population Increase to 2027	Projected Population 2027	Total Projected Housing Stock 2027	Total Additional Housing Units 2016-2027	Approx. Units Completed 2016-2020	Housing Allocation 2021-2027	Lands with potential to deliver Infill or Brownfield Development (ha)	Potential units to be delivered on Infill/ Brownfield Lands	Total Lands Zoned New Residential Phase 1 (ha)	Total lands zoned New Residential (Phase 1 and Phase 2) (ha)
County	Louth	128,884	21,082	149,966	61,717	10,318	2,040	8,278	110.4	4,302	589 439.4	587.2
Regional Growth Centre	Drogheda	34,199	6,914	41,113	17,184	3,443	400	3,043	34.8	1,725	269 270	270
	Dundalk	39,004	7,660	46,664	19,892	3,541	935	2,606	30	1,743	213 89.4	93.7
Self-Sustaining Growth Towns	Ardee	4,928	1,655	6,583	2,751	749	165	584	8.5	298	54.6 31.1	49.1
	Dunleer	1,822	935	2,757	1,144	425	80	345	3.1	109	13 7.5	8.4
Self-Sustaining Towns	Carlingford	1,445	200	1,645	881	41	0	41	2.6	31	2.2 2.0	1.4
	Castlebellingham / Kilsaran	1,126	110	1,236	597	87	8	79	1.1	27	10.9	10.9
	Clogherhead	2,145	300	2,445	1,034	139	0	139	1.6	39	2.9 3.2	3.2
	Termonfeckin	1,579	250	1,829	663	81	40	41	3.4	40	2.4 4.5	4.5
	Tullyallen	1,547	220	1,767	630	130	15	115	1.2	29	0	0
Small Towns & Villages	Level 4 Settlements	5,103	785	5,888	2,405	436	22	414	24.1	260	21 20.8	20.8
Rural Nodes	Level 5 Settlements	35,986	300	38,039	14,536	1,246	375	871	N/A	N/A	N/A	N/A
Rural Area	Rural Area		1,753									



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Halla an Bhaile
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Contae Lú
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Cuirfear fáilte roimh chomhfhreagras Gaeilge - Correspondence in Irish is welcome