Town Planning Submission

Development Plan Review

Louth County Development Plan 2015-2021

Ardee Co. Louth

November 2019

Formal submission on behalf of

Seamus Rodgers

Hughes Planning & Development Consultants

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1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have been instructed by our client, Seamus Rodgers, who has multiple land interests in Ardee, County Louth, to make a submission in relation to the review of the Louth County Development Plan 2015-2021 and the preparation of the new Louth County Development Plan 2021-2027. This submission is made in response to a public notice dated 27th September 2019, inviting submissions up until Tuesday 26th November 2019, in relation to the preparation of the Louth County Development Plan 2021-2027.

In summary this submission requests that Louth County Council recognise the following:

- That the Ardee Local Area Plan 2010-2016 provides for an inadequate population target, it is considered that there is a significant disparity between the quantum of zoned lands and the population target the Local Area Plan provides for;

- According to Section 3.2 of the Ardee Local Area Plan 2010-2016 the target population figure for County Louth in 2026 is 140,896;

- Based on these projected figures, the target population allocation for Ardee as outlined in the Louth County Development Plan 2009-2015, indicated that the population of Ardee would grow to 4,700 by 2016, representing an increase in population of 399 persons on the 2006 Census population figure.

- Given that the current growth target for Ardee has already been surpassed, it is considered that the new county development plan should review the existing targets and set out new population targets which provide for an increased population allocation for Ardee.

We request that the recommendations of this submission be given full consideration in preparation of the forthcoming Louth County Development Plan 2021-2027 in accordance with Part II Section 1 of the Planning and Development Act 2000 (as amended). This submission has regard to the Louth County Council Issues Booklet (Stage 1 Public Consultation), which provides an overall strategic vision for County Louth.

2.0 Pre-Draft Public Consultation Issues Paper

It is noted that the issues paper published with the initial call for submissions at the pre-draft stage of the development plan indicates that the draft plan will include a strategic vision for County Louth, which will underpin all other objectives of the plan. Our client, Seamus Rodgers is a substantial land owner of zoned lands within the town of Ardee County Louth. Thus, in summary this submission requests that Louth County Council to consider increasing the total population allocation for the town of Ardee in accordance with the overall stock of zoned land within the town and surrounding hinterland.

The issues paper poses specific questions including the following:

- What is your vision for County Louth?
- Where in the County should population growth be directed to achieve balanced growth as per the RSES?.
- Which rural towns or villages have the capacity to accommodate new development?

In considering the location of Ardee in proximity to the Dublin Belfast Corridor, and its status as a major town on the N2 corridor, which runs from Dublin to Derry, we consider the town to constitute a vibrant settlement with a critical mass capable of supporting local services, retailing, employment and a strong population base whilst also taking advantage of the location and heritage features of the town to promote local tourism. Our client, Seamus Rodgers, requests that the draft development plan adopt a dynamic and progressive approach to the future development of the town and its surrounding hinterland over the plan period with a series of policy initiatives and measures to be included in the draft plan. These measures should proactively encourage development, the allocation of an increased population density and to facilitate encouragement with landowners and employers who can bring forward proposals consistent with the vision for the town.
We recognise the importance of community involvement in the review of the county development plan and respectfully acknowledge the purpose of this first stage of the development plan review process in terms of stimulating discussion on the broader strategic issues relevant to the county.

3.0 Population and Town Development

The Louth County Development Plan 2015-2021 is the relevant statutory development plan for the lands to which this submission relates. Under the current Development Plan the settlement of Ardee is, as per Table 2.2 ‘Settlement Hierarchy Based on County Role’ within Chapter 2 ‘Core Strategy and Settlement Strategy’ of the Development Plan, designates as a ‘Moderate Sustainable Growth Town’ (level 2). These settlements are generally:

- 10km from large growth town;
- on public transportation corridor; and
- serve rural hinterland as market towns.

Furthermore, its is noted that the development strategy for County Louth has been informed by the Regional Planning Guidelines for the Border Region, 2010-2022 and by the environmental sensitivities of the County. In this regard we note that the focus of this strategy is on achieving:

‘Critical mass in the large growth towns of Dundalk & Drogheda, at the moderate sustainable growth towns of Ardee and Dunleer and at key small towns.’

In addition to the objective of providing critical mass within Ardee, we note the following policy/objectives of the Development Plan which are relevant to this townland.

SS 6 Aspects relating to Dundalk, Drogheda, Ardee and Dunleer shall be incorporated as part of the review of their respective Local Area Plans.

SS 7 To promote the town of Ardee as a prosperous and thriving local development and service town for Mid- Louth and bordering areas of Monaghan and Meath, where no individual or social group is excluded from the benefits of development and where the principles of environmental, economic and social sustainability including protection of the town’s heritage and the natural and built environment are enshrined and to review the Ardee Local Area Plan following the adoption of the Louth County Development Plan 2015-2021.

The importance of Ardee as the third largest settlement in the county after Dundalk and Drogheda is recognised within the Louth County Development Plan 2015-2021. The Development Plan and the Core Strategy promote the development of Ardee as a medium size town for urban strengthening to serve the needs of the local community and drive development within the locality.

In Louth, the population allocation must be informed by the future housing needs of all urban settlements including Level 2 Settlements such as Ardee. This designated settlement acts as the service locus of its immediate rural hinterland and is considered to be a sustainable location to promote increased population densities and compact urban living.

We note as per the following map extract from Ardee Local Area Plan 2010-2016, Land Use Zoning Map, the lands which are within the ownership of our client are included within the Ardee Local Area Plan 2016-2019, which is set within the context of the Louth County Development Plan 2009-2015. This submission does not advance any specific proposals relating to these lands but simply identifies those lands which are owned by our client. The Local Area Plan details an over-arching strategy for the proper planning and sustainable development of Ardee over the timescale of the plan. Ardee is identified as being the principal town and population centre for mid-Louth.
Referring to Table 3.1 of the Local Area Plan, County Louth has been set a population growth target of 137,088 people by 2021 and 140,896 by 2026 in the current development plan. This would represent an increase of approximately 8% over the recorded population of 2016. Furthermore, a target population allocation for Ardee is included within the Louth County Development Plan 2009-2015, which is based upon these projected population figures.

**Table 3.1: Projected Population for County Louth 2011 to 2026**

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2016</th>
<th>2021</th>
<th>2026</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>122,570</td>
<td>130,900</td>
<td>137,088</td>
<td>140,896</td>
</tr>
</tbody>
</table>

Figure 1.0  Map indicating the lands which are which the ownership of our client

Figure 2.0  Table indicating the projected population growth for County Louth from 2011-2026
Table 3.2: Target Population Allocation

<table>
<thead>
<tr>
<th></th>
<th>Population 2006</th>
<th>Projected population 2016</th>
<th>Increase</th>
<th>% Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ardee</td>
<td>4,301</td>
<td>4,700</td>
<td>399</td>
<td>9.3</td>
</tr>
</tbody>
</table>

Source: Chapter 1, Louth County Development Plan 2009-2015

Figure 3.0 Table indicating the target population allocation for Ardee based on the projected population growth contained within Figure 2.0 above

<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ardee</td>
<td>4,301</td>
<td>4,554</td>
<td>4,919</td>
</tr>
</tbody>
</table>

Figure 4.0 Table indicating the total population for Ardee 2006-2016

The above Table (Table 4.0) demonstrates that population of Ardee has steadily increased from 2006-2011, with the 2016 total population figure being in excess of the projected growth figure indicated within Table 3.2 of the Louth County Development Plan. On this basis, we submit that an increased proportion of the overall projected population growth for County Louth should be allocated to Ardee.

We consider the settlement of Ardee to have a significant role to play in the settlement hierarchy of the county. The designation of the town with the Louth County Development Plan as Level 2 - 'Moderate Sustainable Growth Town’ along with Dunleer is noted. Ardee is a vibrant, thriving town with a strong core centre with the necessary infrastructure in place to facilitate additional residential development. We consider that additional population should be directed towards towns that are within the higher tiers of the settlement hierarchy including Dundalk, Drogheda, Dunleer and Ardee.

Overall, we would submit, that a less significant amount of growth should be allocated towards Level 3 & 4 - ‘Small Towns’ settlements, and a greater proportion of growth should be directed towards Large Growth Towns and Moderate Sustainable Growth Towns as included within the Louth County Development Plan 2015-2021 'Settlement Hierarchy of Towns & Villages'.

Figure 5.0 Image from the Pre-draft Public Consultation Issues Paper, which sets out the Settlement Hierarchy of Towns & Villages
Having regard regard to the current development plan population target for Ardee for 2016 (of 4,700) which has been significantly exceeded, combined with the existing critical mass and potential of the town that the revision of the development plan should allow for a more appropriate allocation of population.

4.0 Growth Targets

The current growth targets for County Louth indicate that the population of County Louth is targeted to grow to 140,896 people by 2026. Moreover, the projected population growth target for the County for 2016 of 130,900, represents an additional 8,330 persons from that recorded in 2006. Based on this figure, an additional population of 399 was allocated to Ardee, approximately 4.7% of the projected population growth for 2016 for the county as a whole. As indicated in Figure 4.0 above, which demonstrates the total population for Ardee in accordance with census data, the actual population of Ardee for 2016 is 4,919, representing approximately 7.4% of the projected population growth for the county for 2016, in excess of the population growth that was envisaged by the development plan.

Given the importance of Ardee as the principle town and population centre for mid-Louth, and the quantum of undeveloped zoned land within the town, we consider that this allocation is insufficient. It is not indicated what proportion of this targeted population growth is to be allocated to Ardee for 2021 or 2026. However, the new county development plan will review these existing targets and set out new population growth targets up to 2027.

The current growth target is considered to be unreasonable, it is considered that provision for further planned population increase should be made for the period 2021 to 2027 in the draft plan. An appropriate and increased target for 2027 would facilitate the gradual and organic growth of the town having regard to the expected average increase in the national population. This would facilitate moderate and planned growth of the town over time and the phased delivery of the necessary infrastructure, housing and supporting services to accommodate this growth.

5.0 Current Planning Context.

This section of the report will examine the planning framework, both national and local that informs the use and development of the subject lands. Documents of note are Project Ireland 2040 – National Planning Framework, the National Development Plan 2018-2027, and the Regional and Spatial Economic Strategy (RSES – Eastern & Midland Regional Assembly (2019).


The Project Ireland 2040 – National Planning Framework (2018) seeks more balances and concentrates growth, particularly within the five major cities in Ireland. The following target is outlines in relation to national growth:

‘We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland’s large and smaller towns, villages and rural areas accommodating the other 50% of growth.’

More specifically, strategies are included in Chapter 2.2 of the Planning Framework which seek to target a greater proportion (40%) of future housing development to be within and close to the existing ‘footprint’ of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

While County Louth is located in the Eastern and Midland Regional Assembly area, the North-East is a functional area that comprises part of two Regional Assembly areas that also includes most of County Cavan and County Monaghan in the Northern and Western Region. The key driver for this regional area is the Dublin-Belfast cross-border network, focused on Drogheda, Dundalk and Newry. The Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.
In considering the above, we would note the following national policy objectives as per Project Ireland 2040:

**National Policy Obj. 3a**  
Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

**National Policy Obj. 13**  
In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

**National Policy Obj. 35**  
Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Ardee town contains large land banks of underutilised land which is within close proximity to existing facilities and public transport. It is considered that the town is capable of accommodating additional population and the provision of new homes, consistent with the above national policies.

### 7.0 National Development Plan 2018-2027

The National Development Plan 2018-2027 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein. The National Development Plan demonstrates the Government’s commitment to meeting Ireland’s infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period. This includes investment in high quality integrated public and sustainable transport systems as well as health and education.

‘By 2040 the population of Ireland is expected to reach almost 6 million with a need for 550,000 more homes and the creation of 660,000 additional jobs to achieve and maintain full employment. The need to provide in excess of half-a- million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year’.

### 8.0 Regional and Spatial Economic Strategy (RSES) – Eastern & Midland Regional Assembly (2019)

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) was published in June 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objective of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

At the core of the RSES is the consideration of a settlement hierarchy for the Region, which outlines the key locations for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs. The RSES build on the foundations of Government policy in Project Ireland 2040 and replaces the current Regional Planning Guidelines (RPGs).

We note that Ardee County Louth is located within ‘The Gateway Region’ which is home to a number of large towns and county towns that provide employment and services for a large catchment population. It is considered that settlement centres such as Dundalk and Ardee should be delivering a significant portion of projected population growth for the Eastern Region.

The RSES will promote the strategic function of the Dublin to Belfast corridor as a driver for regional economic development within the Region. This needs to be supported through targeted investment in
transport infrastructure and services in connecting major urban centres and international gateways, complementing and maintaining its function as part of the EU TEN-T core network. The EMRA is seeking to promote public transport-based development on the Dublin – Belfast Economic Corridor.

**RPO 6.3:** Support the effective planning and development of large centres of population and employment along the main economic corridor, in particular Drogheda and Dundalk

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

**RPO 9.4:** Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.

**RPO 9.5:** Support local authorities, either individually or combined, in the provision of a Housing Need Demand Assessment that will inform housing policy that provides for diverse housing demand and is in accordance with statutory guidelines.

**RPO 9.6:** Support local authorities and other relevant agencies such as the Dublin Region Homeless Executive in relation to addressing the issue of homelessness in the Region.

Given the location of Ardee within close proximity to the Dublin-Belfast corridor and the significant quantum of zoned and serviced lands available within the town, it is considered that the town has significant capacity to facilitate a future population increase for the period 2021-2027.
A number of key enablers for growth for each part of the Eastern Region to meet its potential are also outlined, these include:

1. Promote global connectivity and regional accessibility as part of an integrated land use and transport strategy, with a focus on protecting national assets and enhanced inter-regional connectivity.

In response to the above point, we note that Ardee is located along the N2 corridor which runs from Dublin to Derry, providing enhanced regional connectivity. This route also provides efficient access to other strategic national roads such as the M1, N52 and the N53. Therefore, in this regard, we would consider Ardee to be an appropriate, accessible location whereby population growth should be directed.

4. Facilitate collaboration to support the development of the Dublin-Belfast Economic Corridor, to drive synergy in the Drogheda-Dundalk-Newry cross border network and strengthen economic links with the south east extending to Rosslare Europort.
Given the close proximity of Ardee to the Dublin-Belfast Commuter Corridor, we would consider that the compact, planned and co-ordinated growth of the town centre and its surrounding hinterland should be prioritised. It is submitted that Ardee occupies a key strategic position directly adjacent to the Dublin-Belfast Economic Corridor, which facilitates and provides high quality accessibility to international gateways both within and outside the region, on this basis it is considered that future population growth should be accommodated. Furthermore, it is noted that RPO 6.3 specifically requires the support of effective planning and development of large centres of population and employment along the main economic corridor.

7. **Embed a network of Key Towns throughout the Region, which have the capacity to deliver sustainable compact growth and employment for their catchments in tandem with enabling public transport, infrastructure and services**

Ardee is identified as a key town located along the N2 corridor which has significant capacity to deliver sustainable compact growth. The town is well serviced by existing infrastructure and public transport services. As above-mentioned, Ardee is located at the intersection of the N2 and N52 roads, connection to Dublin and Belfast is available via the M1 motorway, which is a short distance from the town, making a commute to Dublin possible in a relatively short period of time. It is also important to consider the availability of public transport services which provide frequent and direct links to Dublin City Centre from Ardee. Bus Eireann Nos. 980 and 32 provide a direct link from Ardee to Dublin City.

8. **Promote balanced growth in a limited number of economically active settlements which have the identified capacity and potential for self-sustaining growth.**

In response to point No. 8 above, we highlight that Ardee is referred to as the principle town and population centre for mid-Louth, with an established and successful local service, shopping and employment centre. In light of this, we are of the strong view that Ardee has the capacity to facilitate additional commensurate growth in line with regional planning policy.

![Table 4.3 NPF Population Projections](image)

**Figure 7.0 Extract from the NPF Population Projections (Regional Spatial and Economic Strategy (RSES) 2019-2031)**

The above figure demonstrates that the total population of County Louth in 2016 was 129,000 according to published CSO figures. According to the envisaged projections, the population of the County is set to increase by at least 10,000 from 2016-2026 and a further 5,000 minimum, from 2026-2031. Upon review of the population projections provided by the National Planning Framework, we believe that additional population growth should be directed towards settlements which are designated within the settlement hierarchy, mainly Level 1 settlements - ‘Large Growth Towns’ and Level 2 ‘Moderate Sustainable Growth Towns’ such as Ardee.
9.0 Conclusion

We request that this submission be considered in the preparation of the County Development Plan 2016-2022. In summary, this submission requests that Louth County Council consider increasing the total population allocation for the town of Ardee in accordance with the overall stock of zoned and underutilised land within the town and surrounding hinterland.

Our client, would like to indicate his availability to discuss the contents of this submission with the officers of the planning authority if required and look forward to the publication of the draft development plan in due course.

Should you require any further information, please do not hesitate to contact the undersigned.

Kevin Hughes MIPI MRTPI
Director
for HPDC Ltd.