



Section 2: Chief Executive's Summary, Response and Recommendation on Zoning Submissions – Introduction

Zoning Submissions Overview

In considering zoning submissions as part of the preparation of the Chief Executive's Report, particular regard was given to the provisions of national planning policy objectives contained within Project Ireland 2040, National Planning Framework and the provisions of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly and indeed the overarching strategic objectives of the draft Louth County Development Plan.

The National Planning Framework sets out national planning objectives for building stronger regions, and for planning growth in our settlements in a compact and sustainable manner. National Policy Objective 3a seeks to deliver at least 40% of all new homes nationally within the built-up footprint of existing settlements and National Policy Objective 3c seeks to deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints. The national strategic outcomes of such policies are to secure a more sustainable future for settlements and for communities. This is a key tenet of the draft Louth County Development Plan. National Policy Objective 9 also limits the population growth of settlements save for Drogheda and Dundalk to 30% and this is a key consideration when assessing availability of zoned lands already identified in the draft Plan vis-a-vis the introduction of new residential zonings in settlements.

The RSES sets out a growth strategy for the region. Central to this is the target growth of the regional growth centres of Drogheda and Dundalk and the facilitation of collaboration and growth of the Dublin-Belfast Economic Corridor whilst also embedding a network of key towns through the region to deliver sustainable regional development. The consideration of zoning submissions to the draft County Development Plan should be considered in the context of the regional policy objective RPO3.2 and RPO 3.3 that seek local authorities in their core strategies to set out measures to achieve compact urban development targets of at least 30% of all new homes within or contiguous to the built up areas of existing urban areas and the identification of regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites.

Table 4.3 of the RSES sets out the settlement typologies and policy responses that is to be pursued in development plans. The CE response and recommendation to each of the zoning submissions to the draft plan are rooted in the core principles set out in national and regional policy documents and indeed within the context of the more local growth and settlement policy strategies set out in the draft Louth County Development Plan. The nature and scale of development in each of the settlements must align with the core strategy, be commensurate with the settlement hierarchy and to the existing built environment of the settlement in question. This approach will ensure a strong and robust hierarchy that can continue to promote a qualitative standard of living for local communities and where there is an alignment of population, employment and housing growth supported by enabling infrastructure. Aligning with this approach will also ensure better potential for success when seeking funding opportunities under the urban and rural regeneration and development fund.

The infrastructural assessment and land use evaluation in appendix 2 of Volume 3 sets out the criteria against which the land parcel in each settlement were assessed. This criteria was also used in the consideration of zoning proposals made during the public consultation stage of the Draft Plan, some of which were not included in the published assessment. The identification of lands for development over the lifetime of this draft CDP must ensure that the delivery of development is realistic relative to the infrastructural investment that may be required in the first instance. There are lands that have the benefit of extant permissions over many years that have failed to materialise. Therefore, there must be a renewed focus on delivery of development that aligns with the core strategy, is commensurate with the settlement hierarchy and availability of services in particular areas and where there are no impediments to development in the shorter term. This requires the prioritisation of serviced lands that are 'ready to go' in appropriate locations in the first instance.

The planning section will be required to monitor the delivery of development on all lands over the lifetime of the County Development Plan and this may require a review of zoning objectives and phasing set out in the Plan where development fails to be delivered to ensure that the population targets for the settlements particularly the regional growth centres of Drogheda and Dundalk is achieved.



Section 2a: Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Drogheda

Submission No.**LCDP DR007**

Submitted by:

Genesis Planning Consultants on behalf of Weirhope Developments Limited

Theme (s):

Rezone Drogheda - Core Strategy

Map showing lands subject to Submission:**Summary of Submission:**

The submission relates to a 3.0ha site along Marsh Road, Drogheda. In the draft Louth CDP 2021-2027 the subject lands are designated as 'A1 Existing Residential' and 'E1 General Employment', the submission requests the lands are zoned 'A2 New Residential' in their entirety.

The submission provides particulars concerning the national and local importance of the site's location. Drogheda is a Regional Growth Centre and the lands are strategically located east of the town centre along the R150.

A detailed analysis of national, regional and local policy is provided. It is stated that the subject lands should be prioritised for development as this would be compliant with Objectives 2b, 3a,3b, 4, 5, 6, 7, 11, 13, 35, 44 of the NPF. In relation to regional policy the submissions states that the subject site is within the settlement boundary and its development will increase the number of residential units available in a sustainable manner. Development of the site for residential purposes would also be compliant with the Drogheda Borough Council Development Plan 2011-2017.

The submission provides a comprehensive study of the site context and local connections, it is in proximity to the town centre, train station and employment centres thus the sites development would be sequentially acceptable.

An analysis of population growth of Drogheda and St Laurence Gate ED, vacancy rates, housing mix and affordability was undertaken. The evaluation concluded that there is a shortage of residential units and development of the subject lands for residential purposes should be supported. An overall design concept and phasing strategy for the site has been provided.

In terms of sequential development the submissions claims the site is appropriate, given that it is:

- Directly accessible from the existing road infrastructure
- Serviced;
- Included within the settlement boundary of Drogheda, in close proximity to the town centre;
- Within walking and cycling distance of local amenities;
- Sequentially the next available parcel of land available for development and provides a brownfield/ infill opportunity; and
- It is stated that the site is strategically important to the overall development of Drogheda.

Chief Executive's Response:

The subject lands are subject to a split zoning - E1 General Employment within the eastern portion and A1 Existing Residential within the western portion of the site.

The designation of Drogheda as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Drogheda in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

As part of the preparation of the Local Area Plan for Drogheda, a review of the land use zonings will be carried out. This will include an updated analysis and assessment of residential land availability, requirements, and infrastructure constraints. There will also be an emphasis placed on the delivery of residential land through the implementation of the Active Land Management Strategy.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR012
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Submitted by:	Des Gaffney
Theme (s):	Rezone Drogheda

Map showing lands subject to Submission:



Summary of Submission:

Request to re-zone lands (0.1853ha) on Donore Road, Drogheda from Open Space to Residential (either existing or new).

In Support:

There is an existing farm house and outbuilding on site therefore it is an ideal brownfield location. Provision of a housing/ apartment development on site would meet current demand. Furthermore, the site is ideally located in close proximity to the town centre and adjacent to the public transport network and would be a great opportunity to provide a gateway building.

Chief Executive's Response:

The subject lands are presently zoned H1 Open Space and form part of a strip of open space which stretches from the east side of Donore Road to the R132. The lands contain a derelict farm house and outbuilding. It is therefore considered appropriate to change the zoning from H1 Open Space to A1 Existing Residential.

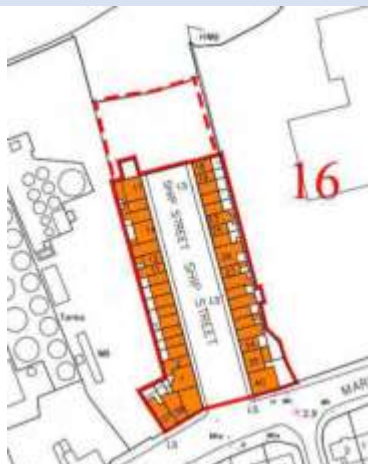
Chief Executive's Recommendation

Change the zoning from H1 Open Space to A1 Existing Residential.

Submission No:	LCDP DR131
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Submitted By Theme (s):	Ship Street R//a, Upstate Theatre Project Re-zoning, ACA, Additional policy, Amended policy
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Map showing lands subject to Submission:



Summary of Submission:

The submission requests that:

1. Ship Street (the street itself) not just the buildings thereon are included within the Regeneration (D1) zoning.
2. The 'Ship Street Architectural Conservation Statement is adopted' and that the 'Ship Street' Architectural Conservation Area boundary is extended southward to the waterfront.
3. It is requested that the Drogheda Docklands Area Plan 2007 is not adopted within the development plan without modification in respect of Ship Street outlined in the Ship Street Architectural Conservation Statement. Neither the Upstate Project nor the Ship Street residents were consulted.
4. A taskforce is set up for the development of 'Ship Street'. In addition to HOU9, 10, 11, 32 and 34, Ship Street should be specifically referred to in relation to collaboration.
5. A property along Ship Street could be developed to provide a cultural facility this would be in compliance with TOUT23, SC22 and TOUT23.
6. Ship Street is identified as a priority project; this would be in compliance with BHC 25 and BHC 21.
7. Identify Ship Street as a specific priority project in the following policies; IU2, IU3, IU27 and CA3

Chief Executive's Response:

As noted in the submission, the road along Ship Street is not zoned but rather each of the buildings in the vicinity are zoned. It should be noted that this is the zoning methodology applied throughout each of the zoning maps and is not particular to Ship Street. Therefore, no change is required. Ship Street is identified within the 2007 Docklands Area Plan for regeneration and this zoning has been carried through in this Draft County Plan. The Ship Street ACA is included within the Draft Plan (see Appendix 14, ACA no. 16). Any changes to the boundary of this ACA will be assessed during the preparation of the Drogheda LAP.

The submission requests that Ship Street is specifically referenced within many of the Policy Objectives in the Plan. The Plan has been written to provide for broad policy objectives for the County as a whole and it is not considered appropriate to reference specific locations within these policy objectives. Specific policy objectives may be considered within the Drogheda LAP.

The submission also suggests the establishment of a Task Force and possible CPO's along Ship Street. This is not the role of the County Development Plan and no change is considered necessary.

Chief Executive's Recommendation:

No Change

Submission No.

LCDP DR160

Submitted by:

Moneymore Community House Limited

Theme (s):

Rezone Drogheda

Map showing lands subject to Submission:



Summary of Submission:

The submission lands at Moneymore. In the draft Louth CDP 2021-2027 the subject lands are designated as 'H1 Open Space'. The submission requests the allocation of the site for a Community Centre. The submission provides particulars concerning Moneymore and the aim of providing a community centre on the subject lands.

Chief Executive's Response:

The subject lands are zoned H1 Open Space with the objective to preserve, provide and improve recreational amenity and open space. It is noted that under this zoning, a Community Facility is open for consideration. H1 Open Space is considered to be the most appropriate zoning for the subject site, noting that Community Facility remains open for consideration.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR187
Submitted By	Genesis Planning Consultants on behalf of PJ and EJ Doherty
Theme (s):	Rezone Drogheda
Map showing lands subject to Submission:	



Summary of Submission:

The submission relates to a 4.7ha site along Marsh Road, Drogheda. In the draft Louth CDP 2021-2027 the subject lands are designated as General Employment (E1) and Open Space (H1) the submission requests the lands are re-zoned A2 New Residential.

In support:

The submission provides particulars concerning the national and local importance of the site's location. Drogheda is a Regional Growth Centre and the lands are strategically located east of the town centre along the R150.

A detailed analysis of national, regional and local policy is provided. It is stated that the subject lands should be prioritised for development as this would be compliant with Objectives 2b, 3a, 3b, 4, 5, 6, 7, 11, 13, 35, 44 of the NPF. In relation to regional policy the submissions states that the subject site is within the settlement boundary and its development will increase the number of residential units available in a sustainable manner. Development of the site for residential purposes would also be compliant with the Drogheda Borough Council Development Plan 2011-2017.

The submission provides a comprehensive study of the site context and local connections, it is in proximity to the town centre, train station and employment centres thus the sites development would be sequentially acceptable.

An analysis of population growth of Drogheda and St Laurence Gate ED, vacancy rates, housing mix and affordability was undertaken. The evaluation concluded that there is a shortage of residential units and development of the subject lands for residential purposes should be supported. An overall design concept and phasing strategy for the site has been provided.

In terms of sequential development the submissions claims the site is appropriate, given that it is:

- Site is considered to be Tier 1 in the 'Tiered Assessment';
- Directly accessible from the existing road infrastructure;
- Serviced;
- Included within the settlement boundary of Drogheda, in close proximity to the town centre;
- Within walking and cycling distance of local amenities; and
- Sequentially the next available parcel of land available for development and provides a brownfield/ infill opportunity.

With regard to the location of the site, it is stated:

- The northern boundary is defined by the River Boyne thereby providing an opportunity to bring residential activity to this edge-of centre waterfront location;
- A residential scheme is appropriate as the eastern boundary is defined by the existing Inver Colpe Rowing Club Clubhouse premises and residential development opposite;
- Further south of the subject lands is the Louth County Council LIHAF (Local Infrastructure Housing Activation Fund) Road Scheme, which provides access to the Drogheda Transport Development Area (DTDA) via Marsh Road. This road scheme provides a clear upgrade to local road infrastructure to coincide with a residential scheme on the lands being developed;
- Objectives of the nearby DTDA is to 'protect and expand the existing transport hub around the train station and facilitate the development of Public Transport facilities including residential, retail, and office development'. The location and principle for Ravala SHD has been deemed acceptable by the both the Planning Authority and the board. In this context the subject lands are brownfield, closer to the town centre and have more existing infrastructure and community services than the Ravala SHD site; and
- The zoning of the subject lands as residential would be consistent and appropriate.

The site is considered to be strategically important to the overall development of Drogheda.

Chief Executive's Response:

The subject lands are subject to a split zoning – the majority of the site is zoned E1 General Employment and a small strip of H1 Open Space land.

The designation of Drogheda as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Drogheda in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

As part of the preparation of the Local Area Plan for Drogheda, a review of the land use zonings will be carried out. This will include an updated analysis and assessment of residential land availability, requirements, and infrastructure constraints.

There will also be an emphasis placed on the delivery of residential land through the implementation of the Active Land Management Strategy.

While the subject lands would be considered to be brownfield, infill development it is not considered appropriate to zone these lands for A2 New Residential. It is noted that LIHAF funding has been secured at Newtown for the construction of a new access road which will open up zoned residential lands for development in close proximity to Drogheda Town Centre and Drogheda railway station. However, it is considered that the lands between the River Boyne and the Marsh Roads (including the subject site) are of an industrial nature and considering the location of the Seveso Site (Flogas Ireland Limited) these lands would be unsuitable for A2 New Residential zoning.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR207

Submitted By

Stephen Ward on behalf of Newlands Food Market Limited

Theme (s):

Re-zoning

Map showing lands subject to Submission:



Summary of Submission:

Rezoning of the lands (0.2ha) edged red on the map above from A1 – Existing Residential to B2 Neighbourhood Centre.

In Support

Planning History

Under PA Ref 02510176 planning permission was granted for the following development – “(a) Change of use of the existing retail/workshop to retail, single storey extension to rear, new pitch roof and new shopfront, (b) conversion of the existing 2 no. retail units to 4 no. retail units with new shopfronts and (c) alterations to existing car parking to the front and part removal of the existing bank to the rear to provide additional car parking.”

Under PA Ref 20/462 planning permission was refused for the following proposed development –Permission for development for provision of an off-license for the sale of alcohol within the existing retail unit 2. Remove existing separating wall between unit 1 and unit 2 incorporating the retail unit 2 as part of retail unit 1. Proposed shop front over combined unit 1 and unit 2 with associated lettering and all related works at unit 1 and unit 2.

Permission was refused for the following reasons:

- The development for which permission is sought will provide an off-license and an extended floor area within an existing convenience store which does not have the benefit of planning permission. The Planning Authority is therefore precluded from considering granting permission for the subject development in this instance;
- The proposed development is located on land that is zoned residential for purposes in the Drogheda Borough Council Development Plan 2011-2017 where local shops with a floor area of not more than 200sq.m are open for consideration. The floor area proposed would be some 470sq.m. As such the proposed development would materially contravene the said zoning objective of the Plan and would be contrary to the proper planning and sustainable development of the area;

The refusal of permission relates primarily to the retail floorspace on site and that floor space exceeding that permitted under the residential zoning of the site. A change of zoning to B2 Neighbourhood Centre would remove that restriction and would also allow neighbourhood scale convenience retail uses on the site.

A detailed analysis of the proposed zoning in relation to policies with the draft plan was carried out, SO2, 8 and 10 and HOU4 are specifically mentioned. Section 3.6 and paragraph 4.2 are also cited.

It is concluded that:

- The submission lands are ideally suited to act as a neighbourhood centre;
- Would not cause harm to the residential amenities of the area;
- The Infrastructure Section of the Council had no objection to the proposed development(planning reference20/462);
- The existing residential zoning does not reflect the permitted and established development on the site; and
- The existing residential zoning also constrains the provision of a reasonable level of retail on the site to reflect a small scale neighbourhood centre

Chief Executive's Response:

The subject site is zoned A1 Existing Residential. Whilst residential units have been developed to the west of the subject site, it is noted that the existing site comprises largely of retail and commercial premises (Bloomsbury Centre). It is noteworthy that the lands further to the east (existing Spar convenience shop) are zoned B2 Neighbourhood Centre. Given the current uses on the site and its proximity to the town centre it is considered that a B2 zoning is appropriate for this site.

Chief Executive's Recommendation:

Change zoning from A1 Existing Residential to B2 Neighbourhood Centre.

Submission No:**LCDP DR214**

Submitted By

Stephen Ward on behalf of Mr. P Mc Coy

Theme (s):

Rezone Drogheda

Map showing lands subject to Submission:**Summary of Submission:**

This submission seeks the rezoning of the lands edged red on the Site Location Map above from B2 – Neighbourhood Centre, E1 – General Employment and G1 – Community Facilities to C1 - Mixed Use and the application of a ‘Spot Objective’ for the lands to encourage rejuvenation of the site for a broad mixed use area incorporating residential and supporting residential uses as well as neighbourhood, commercial and community/leisure /recreation and employment uses in the Development Plan.

In Support:

- Planning history of the site outlined which includes appeal decisions pertaining to the site a leisure centre and neighbourhood centre (r PA Ref 03/281 An Bord Pleanála Ref PL54.208394) and a primary care centre (11/88, An Bord Pleanála Ref PL54.240365), it is stated that a mixed use on the site has been established;
- Drogheda is a designated Regional Growth Centre and the town is planned to grow to a population of at least 50,000 by 2031. Having regard to proposed developments a further 1,870 people could live within a 10 to 15 minute walk;
- In terms of the draft Louth CDP 2021-2027 rezoning would be consistent with Strategic Objective’s SO2 and SO8 in relation to supporting population growth; CS2, CS3 , HOU11and SS10, pertaining to brownfield development and HOU 12 and Chapter 4 which relate to social inclusion;
- The Bowling and indoor football pitches on site were not commercially viable and closed a number of years ago. All weather out-door ‘five-a-side’ pitches have been provided at the Drogheda Boys FC facility just to the south and there are playing pitches to the east and south and also at St. Oliver’s Community College. Taking this into account the proposed rezoning will not conflict with Policy Objectives SC8 or SC14 of the Draft Plan which aims to resist the loss of pitches unless alternatives are available; and
- Visual impressions of a rejuvenated centre have been provided.

Chief Executive's Response:

As per the submission the subject lands include three separate zoning. The north western portion of the lands is zoned E1 General Employment (LMFM radio studios). The north eastern portion is zoned B2 Neighbourhood Centre (Rathmullan Neighbourhood Centre). The remained of the lands are zoned G1 Community Facilities.

It is considered that the E1 and B2 zonings are appropriate given the existing uses on these lands. The Rathmullan Neighbourhood Centre in particular serves as an important amenity for neighbouring residential areas. The remainder of the lands which are zoned G1 Community Facilities include the former Leisure Park premises and car park, which also serves the Aura Leisure Centre. The number of recreational facilities (including Aura Leisure) and playing fields in the immediate vicinity is noted. It is therefore considered that the G1 zoning could change to C1 Mixed Use, to allow greater flexibility for additional uses on the site. The change in zoning is considered sufficient to encourage redevelopment of the site and a spot objective is not necessary.

Chief Executive's Recommendation:

Change the zoning on the southern portion of the site from G1 Community Facilities to C1 Mixed Use, to allow greater flexibility for additional uses on the site.

Submission No:

LCDP DR262

Submitted By

Brady Hughes on behalf of Boyne Grove Fruit Farms.

Theme (s):

Rezone Drogheda

Map showing lands subject to Submission:



Figure 1 – Satellite Image with Boyne Grove Fruit Farms highlighted.

Summary of Submission:

The submission relates to a residential farmyard at Stameen, Dublin Road Drogheda. In the draft Louth CDP 2021-2027 the subject lands are designated as General Employment E1 the submissions request that the lands are re-zoned to Residential Existing (A1).

The submission states:

- The McNeece family, owners of Boyne Grove Fruit Farms developed Roschoill Housing Estate;
- Planning permission was granted for 52 units under planning reference 07/207 (Drogheda Borough Council ref). This scheme did not proceed due to the economic downturn and the planning permission has since expired;
- It is intended to relocate the farmyard and develop the site as an infill/brownfield residential development;
- There is an opportunity to increase the residential density on a serviced brownfield site, in accordance with National and Regional planning policy objectives. This would not be possible under the General Employment E1 zoning;
- Many of the uses in General Employment E1 zoning are not for a residential area;
- It is not clear why the zoning was changed from Residential Existing to Employment; and
- Proposal would comply within the NPF in terms of compact growth, infill and brownfield development (NPO 35 is specifically mentioned).

Chief Executive's Response:

The subject site is zoned RE – Residential Existing under the Drogheda Borough Council Development Plan 2011-2017 and is proposed as E1 General Employment under the draft Plan. However, it is noted that the subject site lies within an established residential area (Roschoill and Castlewood) and access to the site is via Roschoill housing estate. It is also noted that there is an existing residential property within the subject lands.

Chief Executive's Recommendation:

Change zoning of subject lands from E1 General Employment to A1 Existing Residential

Submission No:	LCDP DR293
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Submitted By	Tom Phillips and Assoc on behalf of Silveroak (Greenhills) Ltd.
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Theme (s):	
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Map showing lands subject to Submission:



Figure S.1: Zoning Controls and indicative location of the subject site (source: Draft Louth County Development Plan 2021-2027).

Summary of Submission:

National Planning Policy

A review of National policy has been undertaken, it promotes new residential development on urban lands, acknowledges the need to increase housing output. The NPF encourages brownfield/infill development- 40% of new housing to be delivered within the existing built up area. NPO 13, 33 and 35 are specifically mentioned. There is a need to increase residential accommodation in conjunction with employment uses. The subject lands could increase the supply of residential accommodation in a desirable neighbourhood, whilst also consolidating development on a brownfield site.

Review of Land Use Zoning Objectives

In the Drogheda Borough Council Development Plan 2011-2017'. The site is subject to 'Employment Generating Zone - EGZ' and 'Open Space and Recreational Area (Public/Private) – OS, these zonings are very restrictive - a hotel and restaurant are not permitted.

In the Draft Louth CDP 2021-2027 the proposed zoning for the front ('developable') part of the site is proposed to be 'E2 – Business and Technology'.

'Residential' is not listed as a 'Generally Permitted Use' or as an 'Open for Consideration' use, indicating it is not fully supported by the Draft Development Plan. 'Residential

(Ancillary)' is an 'Open for Consideration'. It would be preferable to 'Residential Ancillary' as a "Open for Consideration' use, without the caveat of it having to be "limited". A 'hotel' is listed as 'Open for Consideration' is supported.

The submission requests:

1. The subject site should be identified as an 'Opportunity Site' in the Development Plan. This is consistent with Section 3.0 of the draft Louth CDP 2021-2027. An insertion should be made to Section 1.2.1 of the plan which recognizes the strategic importance of this site, see red text below:

Areas identified include the Heritage Quarter and the Westgate Area, which received funding under the Urban Regeneration Development Fund (URDF). Other opportunity sites include the Docklands and the Boyne Mill site located on the Greenhills Road, Drogheda, which represents an excellent infill opportunity for a new, employment-led, mixed use development. This approach is supported by the RSES over and above the development of greenfield sites."

2. The Subject Site should have a 'SO – Spot Objective'

In the Business and Technology E2' zoning employment generating uses are promoted but that other, complementary uses should be facilitated on the site as part of a larger campus style development proposal. It is requested that the following is added to Table 13.2:

Spot Objective Number	Location	Objective
7	Drogheda	To provide a new mixed use development which will reinvigorate this underutilised site and deliver significant physical, economic, social and conservation benefits.

3. Residential Ancillary

In the 'E2 – Business and Technology' 'Residential (Ancillary)' use is 'Open for Consideration' use, which is defined as "limited residential development ancillary to an existing or proposed business/industrial operation may be considered", this is too restrictive. Section 13.19.17 of the Plan should be amended to read:

"Residential (Ancillary) - Residential development ancillary to an existing or proposed business/industrial operation may be considered".

4. Within the E2 Zoning Objective 'Business Enterprise Centre' and 'Hotel' should be in the 'Generally Permitted Use' category. At present, each of these land uses are listed in the 'Open for Consideration' category.
 5. 'Nursing Home' and 'Health Care Centre'
- It is recommended 'Nursing Home' and 'Health Care Centre' be listed in the 'Open for Consideration' category for the E2 Zoning Objective. There is a presumption against the provision of Nursing Homes in the open countryside, a nursing home in this location healthcare services to people in an existing urban area.

Chief Executive's Response:

The subject site is located at the edge of Drogheda town centre and comprises a large brownfield site which was previously used as an old linen mill complex. There is an historic mill and associated chimney stack currently on the site (both Protected Structures) together with a number of other older industrial buildings, which have since fallen into disrepair. There are 5 no. Protected Structures on the site in total.

The subject site has a zoning of E2 Business and Technology across the majority of the site with a smaller portion of the site (to the north) zoned H1 Open Space. The site was largely zoned EGZ Employment Generating Zone within the Drogheda Borough Council Development Plan 2011-2017.

The submission references a number of possible uses on this site including Residential, Hotel, Nursing Home and Health Care Centre. While it is considered that the site could support a number of uses, it is not considered appropriate to adjust the uses which are generally permitted or open for consideration on the E2 Business and Technology as this would have an impact on the said zoning throughout the County.

The proposed Spot Objective is quite broad. It is considered a more specific spot objective is required for these lands, in particular to ensure that any development of the site includes for the redevelopment of the Protected Structures. In order to ensure an appropriate mix of uses on the site the quantum of residential development will be restricted to no more than 80 residential units.

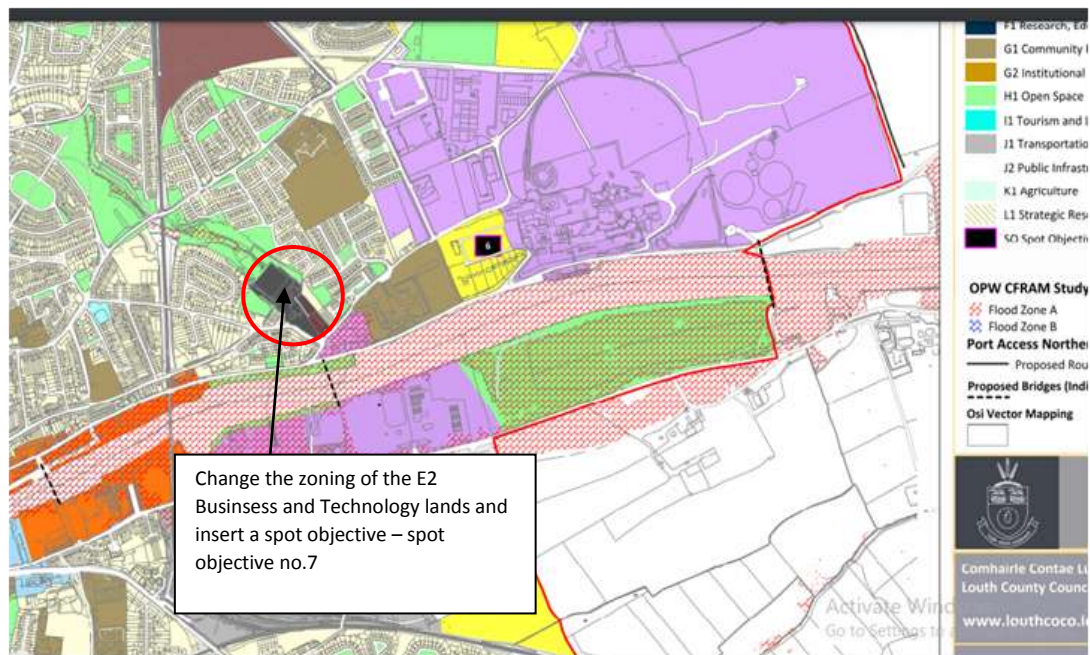
Nonetheless, it would be appropriate to consider a broader zoning objective for the site which would allow for a greater range of uses on the site. It is recommended that the zoning is changed from E2 Business and Technology to C1 Mixed Use which has an objective to provide for commercial, business and supporting residential uses. The H1 'Open Space' zoning shall be retained as proposed.

Chief Executive's Recommendation:

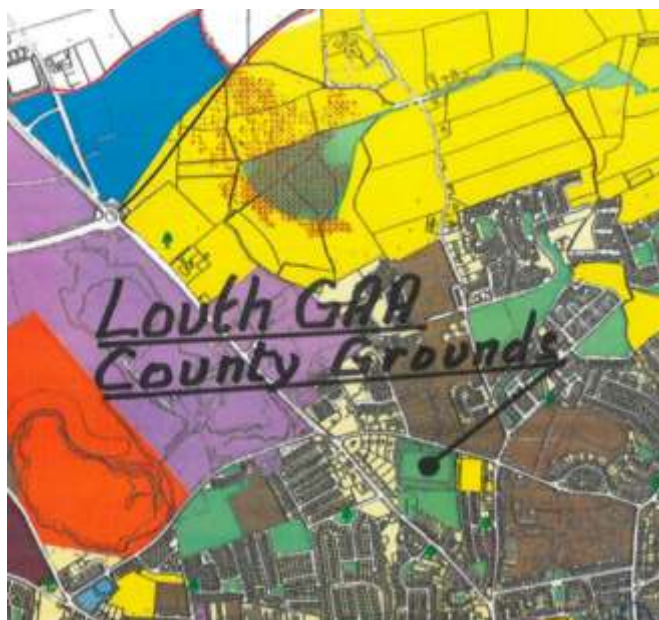
Change zoning from E2 Business and Technology to C1 Mixed Use

Insert the following Spot Objective into Table 13.2:

Spot Objective Number	Location	Objective
7	Drogheda	To provide a mixed use development which will reinvigorate this underutilised site and deliver significant physical, economic, social, and conservation benefits. Any planning application on these lands shall include proposals for the reuse and restoration of the Protected Structures on the site. The total number of residential units on these lands shall not exceed 80. Any application for residential development shall include proposals for the restoration of the Protected Structures, which shall take place in tandem with the delivery of any residential development.



Submission No:	LCDP DR325
Submitted By	Louth GAA County Board
Theme (s):	Rezone Drogheda
Map showing lands subject to Submission:	



Summary of Submission:

In the draft Louth CDP 2021-2027 the lands are zoned as 'Open Space (H1)' it is requested that the lands are zoned 'Community Facilities' or an additional zoning is applied 'Community and Recreational Facilities. This would allow the existing use to continue indefinitely should no community facility development take place.

A substantial interest has been shown by developers to develop lands for major community purposes. The development would be a major social and economic benefit for Drogheda given the location of the site.

Chief Executive's Response:

The subject lands are zoned H1 Open Space with the objective to preserve, provide and improve recreational amenity and open space. The existing playing fields also house O'Raghallaighs GAA and their use as playing fields is considered to be important to the local area. It is considered appropriate to change the zoning objective to G1 Community Facilities.

Chief Executive's Recommendation:

Amend zoning of subject site from H1 (Open Space) to G1 (Community Facilities)

Submission No:

LCDP DR380

Submitted By

MKO Planning consultants on behalf of Sionna Homes

Theme (s):

Support zoning Drogheda, Additional Wording

Map showing lands subject to Submission:



Summary of Submission:

- Support the re-zoning of lands to Residential New and the Spot Objective 6 to achieve 40% (minimum) open space on the site (3.76ha);
- It is requested that coffee shop/tea room and restaurant are added to the list of Generally Permitted Uses on A2 lands;
- Table 13.3 should be re-titled, and the associated text of the Plan altered to provide density ranges and noted flexibility therein; and
- Buildings heights should be cross referenced in Chapters 3 and 13.

In Support

Planning History

Recent permission on site (19/674) focused on residentially zoned portion of the site and did not include central open space, it was requested that the overall density on the site be increased, and application was subsequently withdrawn with the view of revisiting the application upon release of draft Louth CDP 2021-2027, allowing a holistic design approach to be taken.

Development Proposal

Development of c. 190 units with 40% open space is proposed, this is in accordance with the population targets in the NPF and RSES's and Drogheda's role as a Regional Growth Centre. Proposal will make more efficient use of the site and is conducive to sustainable urban place making.

Draft Development Plan

Detailed analysis of the National Planning Framework and the RSES's has been carried out. NSO1 of the NPF is specifically mentioned in relation to the urban footprint. NPO's 3a, 3b, 3c are cited in relation to compact growth. NPO 44 is also mentioned in relation to Drogheda's position on the Dublin- Belfast Corridor. RSO 1, RPO 4.11 and RPO 6.3 of the RSES are also referenced in relation to compact growth, Drogheda's position along the economic corridor and provision of a Joint LAP for Drogheda.

Strategic Vision

It is stated that the strategic vision of the draft Plan complies with National and Regional policy prescribed above.

Core and Settlement Strategy

Drogheda has been designated as a Regional Growth Centre (RGC) in the RSES. The draft Plan projects a housing requirement of 8,278 units over the 6-year Plan period, which equates to an output of 1,380 units per annum. The RGC of Drogheda is expected to, in addition to that of Dundalk, meet a significant proportion of this requirement. It is held that the subject site, being utilised to its maximum potential, will directly contribute to this requirement and create a sustainable, vibrant, integrated community in this location east of the town centre. This approach will accord with the provisions of Policy Objective CS3 and CS4. Development of the site will accord with Policy Objectives SS5 and SS18 of the draft Louth CDP 2021-2027.

Housing Strategy

The housing strategy states there will be a requirement for 29.4% social and affordable housing over the Plan period. Development of the site will be in accordance with Policy Objectives HO1, HOU2 and HOU3. The design of the site will maximize the potential of the site, comply with Spot Objective 6, HOU 10(sustainable communities and neighbourhoods) and HOU 17 (placemaking). The final design will fully comply with HOU 18-25 of the draft Louth CDP 2021-2027.

Environment

Policy Objectives ENV 1, 37 and 38 of the draft Louth CDP 2021-2027 are supported and any development will take account of Policy Objectives ENV 26-28.

Development Management

It is requested that coffee shop/tea room and restaurant are added to the list of Generally Permitted Uses on A2 lands, this will contribute to sense of place.

Spot Objective 6

This Spot Objective is acknowledged, accepted and can be delivered successfully, sketches of open space have been provided.

Density and Plot Ratio

Table 13.3 of the draft Plan should be amended to include flexibility around both densities for Regional Growth Centres. As written it is considered to be restrictive. Table 13.3 should be re-titled, and the associated text of the Plan altered to provide density ranges and noted flexibility therein.

Layout

Height is discussed in the draft Plan at Chapter 13 but also at Chapter 3. The relevant sections should be cross-referenced within the Plan for completeness. Policy Objective HOU 16 of the draft Louth CDP 2021-2027 supports increased building heights in Drogheda. It is intended to use a variety of building heights across the subject site.

Chief Executive's Response:

The subject lands are zoned A2 to provide for new residential neighbourhoods and supporting community facilities. Under this zoning objective Coffee Shop/Tea Room and Restaurant are both open for consideration and therefore there it is not necessary to add these uses to the generally permitted uses. Generally permitted uses are those which are the principal uses for a zoning, i.e. new residential and supporting community facilities in the case of A2.

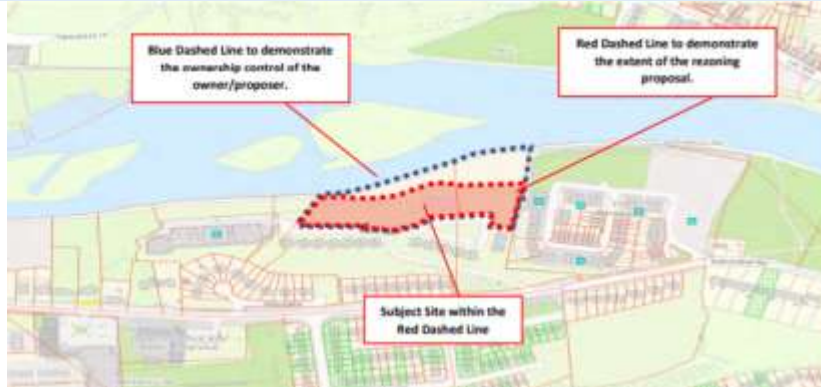
Table 13.3 in Chapter 13 lays out the recommended density and maximum plot ratios for the settlements throughout the County. For the Regional Growth Centres of Drogheda and Dundalk this includes a recommended density of 50 units per hectare for Town/Village Centre locations and 35 units per hectare for Edge of Settlement locations. These densities are considered appropriate for these settlements.

It is noted that Height is referenced in both Chapter 3 and Chapter 13. However, it is also noted that a cross referenced is already included in Section 3.13 which states that *"A full list of the guidance documents relating to residential developments is available in Section 13.8 'Housing' of the Development Management Guidelines in Chapter 13"*.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR456
Submitted By	CWPA Planning and Architecture on behalf of Monmore Development Limited.
Theme (s):	Rezone Drogheda
Map showing lands subject to Submission:	



Summary of Submission:

The site is located at Rathmullan at the Ramparts, Drogheda. The submission requests the rezoning from H1 to A1 residential that would incorporate a mixture of commercial, retail and residential development.

In support:

Development Proposal

Proposal will bring much needed retail and commercial development to the existing residential area of Drogheda. The site has no amenity value and is surrounded by residential development.

Foul Drainage

If rezoned the developer could be compelled to upgrade the existing pumping station to adequately address the volumes of foul drainage generated by the surrounding residential developments. The rezoning would present a planning gain.

Office, Retail, Restaurant/Cafe

Office space would be in a format that addresses the needs of those who must work remotely, or as incubator office units for small businesses wishing to lease office space on short-term leases. Retail offer would be in the form of a convenience store to meet needs of immediate area. High quality riverside restaurant would bring vibrancy – North quay in Drogheda is used as an example.

National , Regional and Local Planning Context

An overview of the NPF is provided in terms of the importance of the economic corridor, need for compact growth and the role of Dundalk/ Drogheda as regional towns. NPO 2b and NPO 7 are specifically mentioned. An analysis of the RSES has also been undertaken the importance of Drogheda as a Regional Growth centre is emphasised, RPO 4.11, 4.12, 4.13, 4.14, 4.15, 4.16. 4.17 and 4.18 are referenced.

A synopsis of the draft Louth CDP 2021-2027 has been presented, the Strategic Vision of the draft Plan as well as Strategic Objective SO1 and SO2 have been highlighted.

Chief Executive's Response:

The subject lands are zoned H1 Open Space with an objective to preserve, provide and improve recreational amenity and open space.

The designation of Drogheda as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Drogheda in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands lie between the River Boyne and existing residential development and presently accommodate hard surfaced tennis courts and open space. It is considered that these lands, along with lands to the east and west of the site serve as intrinsic open space and provide an important amenity for adjoining residential developments. Notwithstanding the fact that an A1 Residential zoning (which is sought in this submission) would not allow for office space and only a limited amount of retail space, it is considered that such a development would detract from Drogheda town centre and the existing neighbourhood centre at Rathmullan.

Furthermore, part of the subject site is located within Flood Zone A (lands within the eastern boundary of the subject site). A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan. Residential Development is classed as a 'Highly Vulnerable development' in 'The Planning System and Flood Risk Management Guidelines' and would not be considered a suitable land use on undeveloped lands located in Flood Zone A, particularly when there are lands with a lower risk of flooding available for development in the town.

It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No: LCDP DR831

Submitted By

Drogheda Alzheimers

Theme (s):

Rezone

Map showing lands subject to Submission:**Summary of Submission:**

Request rezoning of lands at Newtown Links road, Drogheda from General Employment (E1) to Institutional.

- Drogheda Alzheimers have commenced construction of a new dementia day care centre on lands at Greenhills Drogheda (as highlighted with a dark blue border in the map above);
- Discussions have commenced with Louth County Council to explore developing potential complimentary facilities such as respite, living assisted, general medical and dementia and elderly support services on these adjacent lands; and
- Such development would require rezoning to institutional development in line with the zoning of the existing lands where the new day care centre is being currently built.

Chief Executive's Response:

Under Reg. Ref. 19/448 permission was approved for a Dementia Daycare Centre on lands zoned as Existing Residential (RE) under the Drogheda Borough Council Development Plan 2011-2017. The adjacent site, which represents the lands subject to this submission, is zoned as E1 General Employment under this Draft Plan.

It is considered that the subject lands could be accommodated under G1 Community Facilities which has an objective to provide for and protect civic, religious, community, education, health care and social infrastructure.

Chief Executive's Recommendation:

Amend zoning of subject site from E1 (General Employment) to G1 (Community Facilities)

Submission No:	LCDP DR183
Submitted By	Armstrong Fenton Associates on behalf of Ballymakenny Developments
Theme (s):	Support Rezoning Northern Environs Drogheda Request omission of Section 2.13.6 Removal of Open Space Zone
Map showing lands subject to Submission:	



Summary of Submission:

1. Support the proposal to zone lands as New Residential (A2) with an objective which aims 'to provide for new residential neighbourhoods and supporting community facilities'.
2. Removal of the following wording in Section 2.13.6 of the draft Louth CDP 2017-2021: 'requirement for a phased approach to be taken to the development of the Northern Environs in accordance with the phasing arrangements set out in the 2006 Master Plan'
3. Removal of public open space zoning

1. Support for Residential New Zoning

Lands have the benefit of planning permission for c.599 units and 3.74ha of open space (08/274 and subsequent EoD 18/872). Work commenced on the site in Nov 2018 and are presently on going. Furthermore, their location and proximity to necessary and existing services, facilities, transport routes and employment centres and access to meaningful and necessary physical infrastructure provides the most rational and logical approach to the future of these lands.

The LAP for the Northern Environs of Drogheda was made and lands subsequently designated 'Residential Neighbourhood Two' in the subsequent North Drogheda Environs Masterplan, 2006. Following the adoption of the Louth County Development Plan 2021-2027, the Council plans to review the respective development plan for the urban area of Drogheda and ultimately replace the same by a LAP. Zoning of the lands for 'A2-New Residential' use, continues the planning policy support which has been in existence as far back as 2004

The proposed zoning is compliant with the National Policy Objectives as set out in the National Planning Framework; Objectives 3a, 4, 32, 33 are specifically referenced. Development of the site also accords with Rebuilding Ireland – Action Plan for Housing and Homelessness, 2016. Zoning of the site as ‘Residential New’ supports the development of Drogheda as a Regional Growth Centre as per the RSES.

The Core Strategy of the draft Louth CDP, sets a limit on new residential development in Drogheda over the plan period for 3,043 no. residential units. Louth is required to deliver at least 30% of all new homes within existing built up footprints (NPO 3c). Should this approach be applied to Drogheda, this would leave a housing allocation of only circa 2,130 no. units for permission in the North Drogheda environs area. There is currently permission granted for circa 4,000 no. units in the wider North Drogheda environs area. It is considered that the projected allocation is too low when reviewed against the extant permissions and the targets of the RSES and NPF. Louth County Council should be setting a more ambitious growth target.

2. Removal of Wording

Section 2.13.6 of the draft Louth CDP 2017-2021 states that there is ‘requirement for a phased approach to be taken to the development of the Northern Environs in accordance with the phasing arrangements set out in the 2006 Master Plan’. The phasing arrangements set out in the 2006 Master Plan are out of date, are overly prescriptive and provide little flexibility to developers and will inhibit the population growth targets set out in the RSES and NPF. It is requested that this section is removed

The Louth/ Meath Joint UAP / LAP will carry out a more detailed examination of zoned lands after the adoption of the draft CDP. Restricting the phasing of future development in the interim is contrary to the aim of the RSES Growth Strategy which seeks to ensure that Drogheda realises its potential to grow to city scale and secure investment to become a self-sustaining Regional Growth Centre on the Dublin Belfast Economic Corridor.

3. Re-Zoning of Open Space

The area of public open space has been defined zoned H1 running east/west through their residentially zoned lands. This corresponds with the alignment of a linear park, and the area coincides with a 2006 design for the linear park approved under a planning permission which has now expired. This alignment is too prescriptive, and it should be removed. Changing part of the site from A2 to H1 puts unnecessary constraints on designers who may seek to reroute the linear park to more optimal alignments.

Chief Executive’s Response:

It is acknowledged that the implementation of planning permissions in the Northern Environs of Drogheda has not fully aligned with the phasing strategy for the area as set out in the Master Plan for the Northern Environs.

Nonetheless, it is important that the build out of these lands is appropriately managed, particularly when consideration is given to the extent of lands zoned for residential development in the area and the associated number of extant permissions on these lands. In this regard the phasing strategy as set out in the Master Plan provides a strong framework for which to manage development in the area pending a detailed analysis and

updated phasing strategy which will be prepared as part of the Joint Local Area Plan for Drogheda.

Taking this into account it is considered that the text in section 2.13.6 should be rephrased to indicate that the build out of lands in the Northern Environs of Drogheda shall be informed by the phasing arrangements set out in the 2006 Master Plan, pending the preparation of the Local Area Plan. In line with national and regional policy there will be an emphasis placed on achieving consolidation between the areas under construction and the existing built up area of Drogheda rather than the continuation of a dispersed pattern of development in the area. Any future phasing shall also take into consideration the status of the PANCR project.

It is considered that the H1 Open Space zoning is required to deliver the linear park set out in the 2006 Master Plan. This will be revisited during the preparation of the Drogheda LAP.

Chief Executive's Recommendation:

Amend paragraph 3 of section 2.13.6 as follows:

In this regard there will be a requirement for a phased approach to be taken to the development of the Northern Environs. **This shall be informed by** ~~in accordance with the~~ phasing arrangements set out in the 2006 Master Plan (which can be viewed by clicking on this link) or any subsequent Master Plan prepared for the area. **In addition an emphasis shall also be placed on consolidation between areas developed or under construction and the existing built up area of Drogheda rather than a continuation of a dispersed pattern of development in the Northern Environs area.**

Submission No:	LCDP DR192
Submitted By	Brady Hughes Consulting on behalf of Eileen Kelly
Theme (s):	Core Strategy - Wording Zoning Northern Environs Drogheda.
Map showing lands subject to Submission:	



Summary of Submission:

Requested Changes

1. Include a strong unifying vision for Drogheda dispensing with references to Drogheda, South Drogheda Environs and North Drogheda Environs. There is only one settlement for consideration here.
2. Include an objective calling on EMRA to bring forward proposals to advance the preparation of the Unitary Joint Urban Area Plan and ensure delivery in a timely manner.
3. Remove cap on population growth and residential development imposed by the Core Strategy and Housing Allocations which unnecessarily limit growth of this Regional Growth Centre to just 20%, contrary to national and regional policy. Any Household allocation provided in respect of Drogheda should not be limited by extant permissions.
4. Remove the references at Section 2.13.6 to the unwieldy phasing arrangements in the 2006 variation to the 2004 Local Area Plan that have so limited the development of North Drogheda.
5. Remove the references to north Drogheda developing 'over a number of plans' at section 2.13.6
6. Provide a specific policy objective to achieve a new rail station in North Drogheda. There is potential for a second rail station in South Drogheda too presenting the possibility of Dart Links between residential areas like Grange Rath on the Dublin Road and Termon Abbey on the Termonfeckin Road.
7. Remove H1 Zoning through the north Drogheda environs residential area and provide specific objectives regarding the delivery of a linear park.

In support:

Background

Our client owns significant lands (17.48ha) in the North Drogheda Environs Local Area Plan 2004 area, zoned for residential purposes with planning permission for c600 residential units and some commercial space (planning reference 07/1869 extended by 18/641). Permission will expire for this development during the new CDP period.

It considered that Drogheda (and its Northern Environs) are an appropriate location for sustainable residential development and population growth, having regard to:

- Government policy;
- Drogheda's status as a Regional Growth Centre and its unique status as the only Regional Growth centre within the hinterland area of the Greater Dublin Area;
- its strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry;
- The proposed DART Expansion program and the electrification of the rail network to Drogheda. • Drogheda's strong town centre; and
- Drogheda's significant potential for employment growth.

National and Regional planning policy

A detailed analysis of national, regional and local planning policy has been undertaken. NPO's 2b, 11, 27 and 33 of the NPF are specifically mentioned. The role of the National Development Plan 2018 – 2027 in driving the investment projects, programmes and priorities to ensure delivery of the NPF is cited.

In relation to the RSES's its vision, the Drogheda role as a regional growth centre along Belfast-Dublin corridor, its focus on compact growth, the preparation of a joint UAP (RPO 4.11) as well as the role of Drogheda Port and the delivery of the PANCR (RPO 4.12) are highlighted

Draft Louth County Development Plan 2021 – 2027

An evaluation of Meath Draft County Development Plan 2021 – 2027 was also undertaken, the following aspects of which were emphasised:

Drogheda position at top of settlement hierarchy, requirement for a joint UAP, Drogheda projected population increase of 50% from 2016 – 2026 and Meath's justification for same. It was stated that the OPR and EMRA were largely supportive of the 50% growth rate. An overview of Louth's County Councils submission to the draft Meath County Development Plan was provided it: welcomed objectives pertaining to a UAP, acknowledged the 50,000 figure is not a cap on population but questioned the rate of planned growth in South Drogheda, emphasized Drogheda economic potential, supported the preparation of a joint local transport plan and acknowledged the significance of PANCR with respect to the build out of North Drogheda. The submission considers that Meath have taken a proactive approach to future growth so that Drogheda can fulfil its role as a regional economic driver

Draft Louth County Development Plan 2021 – 2027

In relation to the draft Louth CDP 2021 – 2027, the following comments are made:

- There should be a growth rate of 30% not 20% and the Draft CDP should state that this is a target and not a cap- The household allocation of approximately 3000 units 2021 – 2027 for Drogheda is problematic as there are extant permissions for over 4,000 units within the settlement, many of these with 3 – 4 years left to run before they expire. Thus creating a scenario whereby reasonable and deliverable proposals for housing might be refused because of the existence of extant permissions which have little or no chance of being fully realised. Louth County Council should reference these extant permissions in their core strategy analysis and allow for an additional allocation over and above these permissions. We note that the lower tier settlements of Ardee and Dunleer are set to increase 34% and 50% which is contrary to National Policy Objective 9. The Draft Plan provides no rationale for limiting growth in the Regional Growth Centres whilst promoting rapid development in lower tier settlements. Targeted growth rate for Drogheda is too low, and the household allocation, with a significant target for brown field development has the potential to stifle much needed investment and presents as a cap on population growth;
- Figure 7 in Section 2.13 of the draft Louth County Development Plan 2021-2027 shows the extent of Drogheda, it is contended that the influence of Drogheda as a RGC is wider, and the boundary of the UAP is not yet defined;
- Section 2.13 states that 'The UAP/LAP will be informed by the strategic objectives set out in this Draft Plan'. However, no such strategic objectives are actually set out in Louth's Draft Plan with respect to the content of the UAP;

- Section 2.13.6 relates to the Northern Environs of Drogheda, this land bank will act as a counter balance to the level of growth that has taken place in the Southern Environs of the town. If Louth County Council wishes to see the Northern Environs lands acting as a counterbalance to the Southern Environs then it should be allowed to grow at a similar or same rate (50%);
- Development on foot of extant permissions in NE did not commence until 2017 due to the complicated phasing and implementation objectives contained within the 2006 Masterplan;
- Statement in 2.13.6 which states that residential use in the NE are a fundamental part of the long term growth strategy of the town creates uncertainty and dilutes the need for exchequer infrastructure funding/investment in the near term. This statement should be deleted;
- Objective pertaining to provision of a rail station in the Northern Environs area has been omitted. SS13 should be amended to clearly set out that it is Louth County Councils policy that there is a second rail station on the North side of Drogheda. Drogheda is the only Regional Growth Centre within the Core Region (as per RSES) with planned and committed DART links to Dublin City Centre;
- No vision for Drogheda has been provided;
- In terms of the land use map the area of public open space has been defined zoned H1 running east/west is too prescriptive, and it should be removed and dealt with by a spot objective; and
- The land use zoning map includes no 'spot' objective pertaining to the delivery of a rail station on the north side of Drogheda.

Chief Executive's Response:

Section 1.2.1 of the Plan sets out the overall vision for Drogheda with detail and a particular focus on regeneration, residential development, tourism, economic development, enabling infrastructure and the forthcoming Local Area Plan (LAP). Furthermore the Strategic Vision for the County (as set out in Chapter 1) emphasises the proportion of Drogheda as a uniquely attractive place in which to live, work, visit, and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are to the highest standards. The Plan places significant emphases on both Drogheda and Dundalk given their status as Regional Growth Centres within the RSES.

The RSES for the Eastern and Midlands Region includes a Regional Policy Objective for the preparation of a cross boundary statutory Joint Local Area Plan (LAP) for the Regional Growth Centre of Drogheda by Louth and Meath County Councils in collaboration with EMRA (RPO 4.11). This is acknowledged within the Plan and Policy Objective CS 9 is to prioritise the preparation of a Joint Local Area Plan (LAP) for Drogheda in partnership with Meath County Council.

The distribution of population and household growth in the County was evidence led, with an assessment of the capacity of each settlement to accommodate a sustainable level of growth during the lifetime of the Plan. In line with national and regional policy the Draft Plan is prioritising the Regional Growth Centres of Drogheda and Dundalk for population, residential and employment growth. The RSES projects that by 2031 the population of Drogheda and Dundalk will be 50,000 persons.

The Plan acknowledges that the future population growth targeted by the NPF for Drogheda and Dundalk does not seek to cap but rather build on their potential to develop as cities of scale and drivers of national and regional economic growth, investment and prosperity. Notwithstanding this, it should be noted that Chapter 2 'Core Strategy and Settlement Strategy' and the population and housing allocation for Towns and Villages in Volume 2 is being updated to take account of the projected housing demand calculated for Louth in Appendix 1 of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning.

It is considered that the text in section 2.13.6 should be rephrased to indicate that the build out of lands in the Northern Environs of Drogheda shall be informed by the phasing arrangements set out in the 2006 Master Plan, pending the preparation of the Local Area Plan. In line with national and regional policy there will be an emphasis placed on achieving consolidation between the areas under construction and the existing built up area of Drogheda rather than the continuation of a dispersed pattern of development in the area. Any future phasing shall also take into consideration the status of the PANCR project. The reference to the development of these lands over a number of plans is a realistic projection based on the quantity of lands in the Northern Environs.

Whilst the Draft Plan includes a policy objective relating to the provision of additional rail stations the NTA has confirmed that there is currently no provision or funding for such infrastructure outside the scope of DART+. MOV 14 will therefore be amended accordingly. It is considered that the H1 Open Space zoning is required to deliver the linear park set out in the 2006 Master Plan. This will be revisited during the preparation of the Drogheda LAP.

Chief Executive's Recommendation:

Amend paragraph 3 of section 2.13.6 as follows:

In this regard there will be a requirement for a phased approach to be taken to the development of the Northern Environs. **This shall be informed by** ~~in accordance with~~ the phasing arrangements set out in the 2006 Master Plan (which can be viewed by clicking on this link) or any subsequent Master Plan prepared for the area. **In addition an emphasis shall also be placed on consolidation between areas developed or under construction and the existing built up area of Drogheda rather than a continuation of a dispersed pattern of development in the Northern Environs area.**

Submission No:	LCDP DR195
Submitted By	Brady Hughes on behalf of Margaret Reilly
Theme (s):	Rezone Northern Environs Drogheda
Map showing lands subject to Submission:	



Figure 1: Draft Louth County Development Plan Land Using Zoning Map for Drogheda with Margaret Reilly's business premises highlighted

Summary of Submission:

It is requested that the land use zoning map for Drogheda be altered so that our client's established manufacturing operation is provided with the appropriate zoning objective i.e. E1 – General Employment.

In Support:

Background

Grand Designs a built in kitchen and built-in furniture manufacturer was first established in 2009 and has since grown. Owner cooperated with the adjoining landowner to facilitate the provision of a new vehicular access across lands partly owned by her. (Planning Ref 16/458). Phases of Beaulieu Village subsequently constructed. The developer was aware that it was intended to extend the business, 2 planning applications for same were subsequently refused.

In the Draft Louth County Development Plan 2021-2027 the residential zoning is carried forward. An overview of the draft plan has been undertaken and it is stated that the provision of 13.19.2.4 in relation to non-conforming uses is welcomed. Four examples are provided showing where established employment uses were subsequently surrounded by housing developments. The Draft Plan notes that Drogheda's Job: Worker ratio is poor, with Drogheda's economy reliant on commuting workers. It is stated that the County Plan as it applies to Drogheda should be prioritising the protection and creation of employment opportunities side by side with balanced population growth. Existing jobs should not be sacrificed to facilitate residential growth.

Chief Executive's Response:

The subject lands are within the Northern Environs of Drogheda and in an area subject to the Master Plan for the Northern Environs. The existing operations on the site are not impacted by this zoning objective. The Master Plan includes these lands as Existing Residential and it is therefore considered that the A1 zoning should be maintained.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR197

Submitted By

Brady Hughes on behalf of Moffett Investment Holdings

Theme (s):

Core Strategy, Wording, Zoning

Map showing lands subject to Submission:



Figure 1: Satellite Image - Land Ownership in blue, Liscorrie in red.

Summary of Submission:

Requested Changes

1. Include a strong unifying vision for Drogheda dispensing with references to Drogheda, South Drogheda Environs and North Drogheda Environs. There is only one settlement for consideration here.
2. Remove cap on population growth and residential development imposed by the Core Strategy and Housing Allocations which unnecessarily limit growth of this Regional Growth Centre to just 20%, contrary to national and regional policy. Any Household allocation provided in respect of Drogheda should not be limited by extant permissions.
3. Remove the references at Section 2.13.6 to the unwieldy phasing arrangements in the 2006 variation to the 2004 Local Area Plan that have so limited the development of North Drogheda.
4. Flood Zones are shown on the Composite Land Use Zoning Map produced for Drogheda. This shows that the area in which permission for housing has already been granted on our clients lands is, in part, subject to flooding, and that the flood area will exceed the

large open space (identified as the 'wetland park' in the 2006 Masterplan for North Drogheda Environs (adopted as a variation to the 2004 Local Area Plan). The Wetland park was to contain (and attenuate) existing and future flooding events within the identified park so as to make better use of the available land for housing. This function is not referenced in the Draft Plan.

Include a spot objective on the Land Use Zoning Map for Drogheda, on the residentially zoned lands which overlap those areas at risk of flooding adjacent to the planned wetland park, indicating that development in these areas will be subject to flood risk assessment and that mitigation measures including compensatory storage, evidenced with appropriate modelling to demonstrate efficacy of any such proposals will be considered.

5. Provide a specific policy objective to achieve a new rail station in North Drogheda. There is potential for a second rail station in South Drogheda too presenting the possibility of Dart Links between residential areas like Grange Rath on the Dublin Road and Termon Abbey on the Termonfeckin Road.
6. Remove H1 Zoning through the north Drogheda environs residential area and provide specific objectives regarding the delivery of a linear park.

In Support:

Background

Our client owns lands in the North Drogheda Environs Local Area Plan 2004 area, zoned for residential purposes, planning permission granted for 527 residential units and commercial space comprising one of the three designated Neighbourhood Centres in North Drogheda(Planning reference 08/101 extended by 18/667)

It's considered that Drogheda (and its Northern Environs) are an appropriate location for sustainable residential development and population growth, having regard to:

- Government policy;
- Drogheda's status as a Regional Growth Centre and its unique status as the only Regional Growth centre within the hinterland area of the Greater Dublin Area;
- Its strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry;
- The proposed DART Expansion program and the electrification of the rail network to Drogheda. • Drogheda's strong town centre; and
- Drogheda's significant potential for employment growth.

National and Regional Policy

A detailed analysis of national, regional policy has been undertaken. NPO's 2b, 11, 27 and 33 of the NPF are specifically mentioned. The role of the National Development Plan 2018 – 2027 in driving the investment projects, programmes and priorities to ensure delivery of the NPF is cited.

In relation to the RSES's its vision, the Drogheda role as a regional growth centre along Belfast- Dublin corridor, its focus on compact growth, the preparation of a joint UAP (RPO 4.11) as well as the role of Drogheda Port and the delivery of the PANCR (RPO 4.12) are highlighted

Draft Meath County Development Plan 2021 – 2027

An evaluation of draft Meath County Development Plan 2021 – 2027 was also undertaken, the following aspects of which were emphasised: Drogheda's position at top of settlement hierarchy, requirement for a joint UAP, Drogheda projected population increase of 50% from 2016 – 2026 and Meath's justification for same. It was stated that the OPR and EMRA were largely supportive of the 50% growth rate. An overview of Louth's County Councils submission to the draft Meath County Development Plan was provided it: welcomed objectives pertaining to a UAP, acknowledged the 50,000 figure is not a cap on population but questioned the rate of planned growth in South Drogheda, emphasized Drogheda's economic potential, supported the preparation of a joint local transport plan and acknowledged the significance of PANCR with respect to the build out of North Drogheda. The submission considers that Meath have taken a proactive approach to future growth so that Drogheda can fulfil its role as a regional economic driver.

Draft Louth County Development Plan 2021 – 2027

In relation to the draft Louth CDP 2021 – 2027, the following comments are made:

- There should be a growth rate of 30% not 20% and the Draft CDP should state that this is a target and not a cap- The household allocation of approximately 3000 units 2021 – 2027 for Drogheda is problematic as there are extant permissions for over 4,000 units within the settlement, many of these with 3 – 4 years left to run before they expire. Thus creating a scenario whereby reasonable and deliverable proposals for housing might be refused because of the existence of extant permissions which have little or no chance of being fully realised. Louth County Council should reference these extant permissions in their core strategy analysis and allow for an additional allocation over and above these permissions. We note that the lower tier settlements of Ardee and Dunleer are set to increase 34% and 50% which is contrary to National Policy Objective 9. The Draft Plan provides no rationale for limiting growth in the Regional Growth Centres whilst promoting rapid development in lower tier settlements. Targeted growth rate for Drogheda is too low, and the household allocation, with a significant target for brown field development has the potential to stifle much needed investment and presents as a cap on population growth;
- Figure 7 in Section 2.13 of the draft Louth County Development Plan 2021-2027 shows the extent of Drogheda, it is contended that the influence of Drogheda as a RGC is wider, and the boundary of the UAP is not yet defined;
- Section 2.13 states that 'The UAP/LAP will be informed by the strategic objectives set out in this Draft Plan'. However, no such strategic objectives are actually set out in Louth's Draft Plan with respect to the content of the UAP;
- Section 2.13.6 relates to the Northern Environs of Drogheda, this land bank will act as a counter balance to the level of growth that has taken place in the Southern Environs of the town.
- If Louth County Council wishes to see the Northern Environs lands acting as a counterbalance to the Southern Environs then it should be allowed to grow at a similar the same rate (50%);
- Development on foot of extant permissions in NE did not commence until 2017 due to the complicated phasing and implementation objectives contained within the 2006 Masterplan;

- Statement in 2.13.6 which states that residential use in the NE are a fundamental part of the long term growth strategy of the town creates uncertainty and dilutes the need for exchequer infrastructure funding/investment in the near term. This statement should be deleted;
- Objective pertaining to provision of a rail station in the Northern Environs area has been omitted. SS13 should be amended to clearly set out that it is Louth County Councils policy that there is a second rail station on the North side of Drogheda. Drogheda is the only Regional Growth Centre within the Core Region (as per RSES) with planned and committed DART links to Dublin City Centre;
- No vision for Drogheda has been provided;
- In terms of the land use map the area of public open space has been defined zoned H1 running east/west is too prescriptive, and it should be removed and dealt with by a spot objective; and
- The land use zoning map includes no 'spot' objective pertaining to the delivery of a rail station on the north side of Drogheda.

Chief Executive's Response:

Section 1.2.1 of the Plan sets out the overall vision for Drogheda with detail and a particular focus on regeneration, residential development, tourism, economic development, enabling infrastructure and the forthcoming Local Area Plan (LAP). Furthermore the Strategic Vision for the County (as set out in Chapter 1) emphasises the proportion of Drogheda as a uniquely attractive place in which to live, work, visit, and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are to the highest standards. The Plan places significant emphases on both Drogheda and Dundalk given their status as Regional Growth Centres within the RSES.

The distribution of population and household growth in the County was evidence led, with an assessment of the capacity of each settlement to accommodate a sustainable level of growth during the lifetime of the Plan. In line with national and regional policy the Draft Plan is prioritising the Regional Growth Centres of Drogheda and Dundalk for population, residential and employment growth. The RSES projects that by 2031 the population of Drogheda and Dundalk will be 50,000 persons. The Plan acknowledges that the future population growth targeted by the NPF for Drogheda and Dundalk does not seek to cap but rather build on their potential to develop as cities of scale and drivers of national and regional economic growth, investment and prosperity.

Notwithstanding this, it should be noted that Chapter 2 'Core Strategy and Settlement Strategy' and the population and housing allocation for Towns and Villages in Volume 2 is being updated to take account of the projected housing demand calculated for Louth in Appendix 1 of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning.

It is considered that the text in section 2.13.6 should be rephrased to indicate that the build out of lands in the Northern Environs of Drogheda shall be informed by the phasing arrangements set out in the 2006 Master Plan, pending the preparation of the Local Area Plan. In line with national and regional policy there will be an emphasis placed on achieving consolidation between the areas under construction and the existing built up area of

Drogheda rather than the continuation of a dispersed pattern of development in the area. Any future phasing shall also take into consideration the status of the PANCR project. The reference to the development of these lands over a number of plans is a realistic projection based on the quantity of lands in the Northern environs.

Whilst the Draft Plan includes a policy objective relating to the provision of additional rail stations the NTA has confirmed that there is currently no provision or funding for such infrastructure outside the scope of DART+. MOV 14 will therefore be amended accordingly. It is considered that the H1 Open Space zoning is required to deliver the linear park set out in the 2006 Masterplan. This will be revisited during the preparation of the Drogheda LAP. It is considered that the H1 Open Space zoning is required to deliver the linear park set out in the 2006 Master Plan. This will be revisited during the preparation of the Drogheda LAP.

In relation to flood risk, the subject lands were part of a justification test which was carried out as part of the Strategic Flood Risk Assessment (Vol 5). This states that any future planning applications on these lands will be subject to a Site Specific FRA.

Chief Executive's Recommendation:

Amend paragraph 3 of section 2.13.6 as follows:

In this regard there will be a requirement for a phased approach to be taken to the development of the Northern Environs. **This shall be informed by** ~~in accordance with~~ the phasing arrangements set out in the 2006 Master Plan (which can be viewed by clicking on this link) or any subsequent Master Plan prepared for the area. **In addition an emphasis shall also be placed on consolidation between areas developed or under construction and the existing built up area of Drogheda rather than a continuation of a dispersed pattern of development in the Northern Environs area.**

Submission No:	LCDP DR198
Submitted By	Brady Hughes on behalf of the Sands Family
Theme (s):	Core Strategy, Wording, Zoning Northern Environs Drogheda
Map showing lands subject to Submission:	

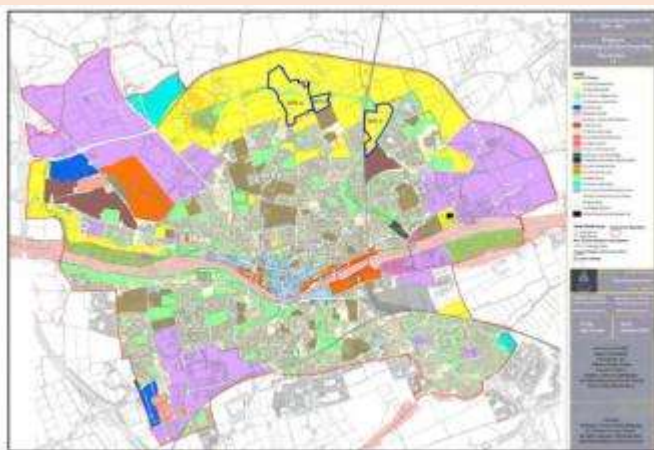


Figure 8: Draft Louth County Development Plan Land Use Zoning Map for Drogheda with Sands Family landholding highlighted.

Summary of Submission:

Requested Changes:

1. Include a strong unifying vision for Drogheda dispensing with references to Drogheda, South Drogheda Environs and North Drogheda Environs. There is only one settlement for consideration here.
2. Include an objective calling on EMRA to bring forward proposals to advance the preparation of the Unitary Joint Urban Area Plan and ensure delivery in a timely manner.
3. Remove cap on population growth and residential development imposed by the Core Strategy and Housing Allocations which unnecessarily limit growth of this Regional Growth Centre to just 20%, contrary to national and regional policy. Any Household allocation provided in respect of Drogheda should not be limited by extant permissions.
4. Remove the references at Section 2.13.6 to the unwieldy phasing arrangements in the 2006 variation to the 2004 Local Area Plan that have so limited the development of North Drogheda.
5. Remove the references to north Drogheda developing 'over a number of plans' at section 2.13.6 6.
6. Provide a specific policy objective to achieve a new rail station in North Drogheda. There is potential for a second rail station in South Drogheda too presenting the possibility of Dart Links between residential areas like Grange Rath on the Dublin Road and Termon Abbey on the Termonfeckin Road.
7. Remove H1 Zoning through the north Drogheda environs residential area and provide specific objectives regarding the delivery of a linear park.

Background.

Our client owns significant lands in the North Drogheda Environs Local Area Plan 2004 area, zoned for residential purposes. These sites are identified as Sites A, B and C in Figure 1 below.

Site A has the benefit of planning permission for a significant residential development of over 600 residential units and over 50% of the Neighbourhood (Planning reference 07/1399 extended by 18/668) Permission will expire for this development in April 2024, during the new CDP period.

It considered that Drogheda (and its Northern Environs) are an appropriate location for sustainable residential development and population growth, having regard to:

- Government policy;
- Drogheda's status as a Regional Growth Centre and its unique status as the only Regional Growth centre within the hinterland area of the Greater Dublin Area;
- Its strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry;
- The proposed DART Expansion program and the electrification of the rail network to Drogheda. • Drogheda's strong town centre; and
- Drogheda's significant potential for employment growth.

National and Regional Policy

A detailed analysis of national, regional policy has been undertaken. NPO's 2b, 11, 27 and 33 of the NPF are specifically mentioned. The role of the National Development Plan 2018 – 2027 in driving the investment projects, programmes and priorities to ensure delivery of the NPF is cited.

In relation to the RSES's its vision, the Drogheda role as a regional growth centre along Belfast- Dublin corridor, its focus on compact growth, the preparation of a joint UAP (RPO 4.11) as well as the role of Drogheda Port and the delivery of the PANCR (RPO 4.12) are highlighted

Draft Meath County Development Plan 2021 – 2027

An evaluation of draft Meath County Development Plan 2021 – 2027 was also undertaken, the following as aspects of which were emphasised: Drogheda position at top of settlement hierarchy, requirement for a joint UAP, Drogheda projected population increase of 50% from 2016 – 2026 and Meath's justification for same. It was stated that that the OPR and EMRA were largely supportive of the 50% growth rate. An overview of Louth's County Councils submission to the draft Meath County Development Plan was provided it: welcomed objectives pertaining to a UAP, acknowledged the 50,000 figure is not a cap on population but questioned the rate of planned growth in South Drogheda, emphasized Drogheda's economic potential, supported the preparation of a joint local transport plan and acknowledged the significance of PANCR with respect to the build out of North Drogheda. The submission considers that Meath have taken a proactive approach to future growth so that Drogheda can fulfil its role as a regional economic driver.

Draft Louth County Development Plan 2021 – 2027

In relation to the draft Louth CDP 2021 – 2027, the following comments are made:

- There should be a growth rate of 30% not 20% and the Draft CDP should state that this is a target and not a cap. The household allocation of approximately 3000 units 2021 – 2027 for Drogheda is problematic as there are extant permissions for over 4,000 units within the settlement, many of these with 3 – 4 years left to run before they expire.

This will create a scenario whereby reasonable and deliverable proposals for housing might be refused because of the existence of extant permissions which have little or no chance of being fully realised. Louth County Council should reference these extant permissions in their core strategy analysis and allow for an additional allocation over and above these permissions. We note that the lower tier settlements of Ardee and Dunleer are set to increase 34% and 50% which is contrary to National Policy Objective 9. The Draft Plan provides no rationale for limiting growth in the Regional Growth Centres whilst promoting rapid development in lower tier settlements. Targeted growth rate for Drogheda is too low, and the household allocation, with a significant target for brown field development has the potential to stifle much needed investment and presents as a cap on population growth;

- Figure 7 in Section 2.13 of the draft Louth County Development Plan 2021-2027 shows the extent of Drogheda, it is contended that the influence of Drogheda as a RGC is wider, and the boundary of the UAP is not yet defined;
- Section 2.13 states that 'The UAP/LAP will be informed by the strategic objectives set out in this Draft Plan'. However, no such strategic objectives are actually set out in Louth's Draft Plan with respect to the content of the UAP;
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- Development on foot of extant permissions in NE did not commence until 2017 due to the complicated phasing and implementation objectives contained within the 2006 Masterplan;
- Statement in 2.13.6 which states that residential use in the NE are a fundamental part of the long term growth strategy of the town creates uncertainty and dilutes the need for exchequer infrastructure funding/investment in the near term. This statement should be deleted;
- Objective pertaining to provision of a rail station in the Northern Environs area has been omitted. SS13 should be amended to clearly set out that it is Louth County Councils policy that there is a second rail station on the North side of Drogheda. Drogheda is the only Regional Growth Centre within the Core Region (as per RSES) with planned and committed DART links to Dublin City Centre;
- No vision for Drogheda has been provided;
- In terms of the land use map the area of public open space has been defined zoned H1 running east/west is too prescriptive, and it should be removed and dealt with by a spot objective and
- The land use zoning map includes no 'spot' objective pertaining to the delivery of a rail station on the north side of Drogheda.

Chief Executive's Response:

Section 1.2.1 of the Plan sets out the overall vision for Drogheda with detail and a particular focus on regeneration, residential development, tourism, economic development, enabling infrastructure and the forthcoming Local Area Plan (LAP).

Furthermore the Strategic Vision for the County (as set out in Chapter 1) emphasises the proportion of Drogheda as a uniquely attractive place in which to live, work, visit, and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are to the highest standards. The Plan places significant emphases on both Drogheda and Dundalk given their status as Regional Growth Centres within the RSES.

The RSES for the Eastern and Midlands Region includes a Regional Policy Objective for the preparation of a cross boundary statutory Joint Local Area Plan (LAP) for the Regional Growth Centre of Drogheda by Louth and Meath County Councils in collaboration with EMRA (RPO 4.11). This is acknowledged within the Plan and Policy Objective CS 9 is to prioritise the preparation of a Joint Local Area Plan (LAP) for Drogheda in partnership with Meath County Council.

The distribution of population and household growth in the County was evidence led, with an assessment of the capacity of each settlement to accommodate a sustainable level of growth during the lifetime of the Plan. In line with national and regional policy the Draft Plan is prioritising the Regional Growth Centres of Drogheda and Dundalk for population, residential and employment growth. The RSES projects that by 2031 the population of Drogheda and Dundalk will be 50,000 persons. The Plan acknowledges that the future population growth targeted by the NPF for Drogheda and Dundalk does not seek to cap but rather build on their potential to develop as cities of scale and drivers of national and regional economic growth, investment and prosperity. Notwithstanding this, it should be noted that Chapter 2 'Core Strategy and Settlement Strategy' and the population and housing allocation for Towns and Villages in Volume 2 is being updated to take account of the projected housing demand calculated for Louth in Appendix 1 of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning.

It is considered that the text in section 2.13.6 should be rephrased to indicate that the build out of lands in the Northern Environs of Drogheda shall be informed by the phasing arrangements set out in the 2006 Master Plan, pending the preparation of the Local Area Plan. In line with national and regional policy there will be an emphasis placed on achieving consolidation between the areas under construction and the existing built up area of Drogheda rather than the continuation of a dispersed pattern of development in the area. Any future phasing shall also take into consideration the status of the PANCR project. The reference to the development of these lands over a number of plans is a realistic projection based on the quantity of lands in the Northern environs.

Whilst the Draft Plan includes a policy objective relating to the provision of additional rail stations, the NTA has confirmed that there is currently no provision or funding for such infrastructure outside the scope of DART+. MOV 14 will therefore be amended accordingly.

It is considered that the H1 Open Space zoning is required to deliver the linear park set out in the 2006 Master Plan. This will be revisited during the preparation of the Drogheda LAP.

Chief Executive's Recommendation:

Amend paragraph 3 of section 2.13.6 as follows:

In this regard there will be a requirement for a phased approach to be taken to the development of the Northern Environs. **This shall be informed by** ~~in accordance with~~ the phasing arrangements set out in the 2006 Master Plan (which can be viewed by clicking on this link) or any subsequent Master Plan prepared for the area. **In addition an emphasis shall also be placed on consolidation between areas developed or under construction and the existing built up area of Drogheda rather than a continuation of a dispersed pattern of development in the Northern Environs area.**

Submission No:

LCDP DR286

Submitted By

Brady Hughes Consulting on behalf of Lorrac developments together with Thomas and Rita Meegan

Theme (s):

Rezone Northern Environs Drogheda - Core Strategy

Map showing lands subject to Submission:



Figure 1: Satellite Image - Land Ownership

Summary of Submission:

1. Change the Mixed-Use zoning on our client's land (and adjoining lands) from Mixed Use to A2 Residential.
2. Remove cap on population growth and residential development imposed by the Core Strategy and Housing Allocations which unnecessarily limits growth of this Regional Growth Centre to just 20%, contrary to national policy.
3. Remove the references at Section 2.13.6 to the unwieldy phasing arrangements in the 2006 variation to the 2004 Local Area Plan that have so limited the development of North Drogheda.

4. Provide a specific policy objective which seeks to achieve a new rail station in North Drogheda to be provided at the council owned lands adjacent to the PANCR / Northern Rail line intersection as per the 2006 Variation to the 2004 LAP

In Support:

Background

Our client owns significant lands in the North Drogheda Environs Local Area Plan 2004 area, zoned for residential purposes. Highlighted blue in the map above.

The 2006 master plan effectively relocated the planned railway station from lands adjoining the submission site to lands further north. An excerpt from the Master Plan 2006 is provided, setting out how the Master Plan varies the North Drogheda Environs Local Area Plan. The lands were no longer required for a transport hub were zoned for Low Density Residential Use, map submitted showing same.

It considered that Drogheda (and its Northern Environs) are an appropriate location for sustainable residential development and population growth, having regard to:

- Government policy;
- Drogheda's status as a Regional Growth Centre and its unique status as the only Regional Growth centre within the hinterland area of the Greater Dublin Area;
- Its strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry;
- The proposed DART Expansion program and the electrification of the rail network to Drogheda. • Drogheda's strong town centre; and
- Drogheda's significant potential for employment growth.

National and Regional Planning Policy

A detailed analysis of national, regional policy has been undertaken. NPO's 2b, 11, 27 and 33 of the NPF are specifically mentioned. The role of the National Development Plan 2018 – 2027 in driving the investment projects, programmes and priorities to ensure delivery of the NPF is cited.

In relation to the RSES's its vision, the Drogheda role as a regional growth centre along Belfast- Dublin corridor, its focus on compact growth, the preparation of a joint UAP (RPO 4.11) as well as the role of Drogheda Port and the delivery of the PANCR (RPO 4.12) are highlighted

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It welcomed objectives pertaining to a UAP, acknowledged the 50,000 figure is not a cap on population but questioned the rate of planned growth in South Drogheda, emphasised Drogheda's economic potential, supported the preparation of a joint local transport plan and acknowledged the significance of PANCR with respect to the build out of North Drogheda. The submission considers that Meath have taken a proactive approach to future growth so that Drogheda can fulfil its role as a regional economic driver.

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In relation to the draft Louth CDP 2021 – 2027, the following comments are made:

- There should be a growth rate of 30% not 20% and the Draft CDP should state that this is a target and not a cap;
- The household allocation of approximately 3000 units 2021 – 2027 for Drogheda is problematic as there are extant permissions for over 4,000 units within the settlement, many of these with 3 – 4 years left to run before they expire, only 200 have been built. Thus creating a scenario whereby reasonable and deliverable proposals for housing might be refused because of the existence of extant permissions which have little or no chance of being fully realised. Louth County Council should reference these extant permissions in their core strategy analysis and allow for an additional allocation over and above these permissions;
- We note that the lower tier settlements of Ardee and Dunleer are set to increase 34% and 50% which is contrary to National Policy Objective 9;
- The Draft Plan provides no rationale for limiting growth in the Regional Growth Centres whilst promoting rapid development in lower tier settlements. Targeted growth rate for Drogheda is too low, and the household allocation, with a significant target for brown field development has the potential to stifle much needed investment and presents as a cap on population growth;
- Figure 7 in Section 2.13 of the draft Louth County Development Plan 2021-2027 shows the extent of Drogheda, it is contended that the influence of Drogheda as a RGC is wider, and the boundary of the UAP is not yet defined;
- Section 2.13 states that 'The UAP/LAP will be informed by the strategic objectives set out in this Draft Plan'. However, no such strategic objectives are actually set out in Louth's Draft Plan with respect to the content of the UAP;
- Section 2.13.6 relates to the Northern Environs of Drogheda, this land bank will act as a counter balance to the level of growth that has taken place in the Southern Environs of the town. If Louth County Council wishes to see the Northern Environs lands acting as a counterbalance to the Southern Environs then it should be allowed to grow at a similar or same rate (50%);
- Development on foot of extant permissions in NE did not commence until 2017 due to the complicated phasing and implementation objectives contained within the 2006 Masterplan;
- Statement in 2.13.6 which states that residential use in the NE are a fundamental part of the long term growth strategy of the town creates uncertainty and dilutes the need for exchequer infrastructure funding/investment in the near term. This statement should be deleted;

- Objective pertaining to provision of a rail station in the Northern Environs area has been omitted. SS13 should be amended to clearly set out that it is Louth County Councils policy that there is a second rail station on the North side of Drogheda. Drogheda is the only Regional Growth Centre within the Core Region (as per RSES) with planned and committed DART links to Dublin City Centre;
- No vision for Drogheda has been provided;
- The settlement boundary for the draft Louth CDP 2021-2027 has combined the boundary of Drogheda and the Drogheda Northern Environs;
- Submission lands zoned for 'Mixed Use' seems to have taken cue from the 2004 LAP (not as varied by the 2006 Masterplan);
- Mixed Use C1 zoning contrary to the 2006 Masterplan and will not allow development of critical mass to support facilities at Aston Village neighbourhood centre which are currently underutilised;
- Commercial development at this location will undermine planned office and commercial spaces in the 3 neighbourhoods;
- In terms of the land use map the area of public open space has been defined zoned H1 running east/west is too prescriptive, and it should be removed and dealt with by a spot objective; and
- The land use zoning map includes no 'spot' objective pertaining to the delivery of a rail station on the north side of Drogheda.

Chief Executive's Response:

The subject lands are zoned C1 Mixed Use, having been previously zoned Mixed Use appropriate to transport hub within the North Drogheda Environs Local Area Plan. The proposed C1 Mixed Use zoning provides for commercial, business and supporting residential uses. It is noted that these are the only lands zoned for this purpose within the Northern Environs and it is considered that this zoning should remain to support to emerging residential communities in the area.

The distribution of population and household growth in the County was evidence led, with an assessment of the capacity of each settlement to accommodate a sustainable level of growth during the lifetime of the Plan. In line with national and regional policy the Draft Plan is prioritising the Regional Growth Centres of Drogheda and Dundalk for population, residential and employment growth. The RSES projects that by 2031 the population of Drogheda and Dundalk will be 50,000 persons.

The Plan acknowledges that the future population growth targeted by the NPF for Drogheda and Dundalk does not seek to cap but rather build on their potential to develop as cities of scale and drivers of national and regional economic growth, investment and prosperity. Notwithstanding this, it should be noted that Chapter 2 'Core Strategy and Settlement Strategy' and the population and housing allocation for Towns and Villages in Volume 2 is being updated to take account of the projected housing demand calculated for Louth in Appendix 1 of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning.

It is considered that the text in section 2.13.6 should be rephrased to indicate that the build out of lands in the Northern Environs of Drogheda shall be informed by the phasing arrangements set out in the 2006 Master Plan, pending the preparation of the Local Area Plan. In line with national and regional policy there will be an emphasis placed on achieving consolidation between the areas under construction and the existing built up area of Drogheda rather than the continuation of a dispersed pattern of development in the area. Any future phasing shall also take into consideration the status of the PANCR project.

Whilst the Draft Plan includes a policy objective relating to the provision of additional rail stations, the NTA has confirmed that there is currently no provision or funding for such infrastructure outside the scope of DART+. MOV 14 will therefore be amended accordingly.

Chief Executive's Recommendation:

Amend paragraph 3 of section 2.13.6 as follows:

In this regard there will be a requirement for a phased approach to be taken to the development of the Northern Environs. **This shall be informed by in accordance with the phasing arrangements set out in the 2006 Master Plan (which can be viewed by clicking on this link) or any subsequent Master Plan prepared for the area. In addition an emphasis shall also be placed on consolidation between areas developed or under construction and the existing built up area of Drogheda rather than a continuation of a dispersed pattern of development in the Northern Environs area.**

Submission No:	LCDP DR724
Submitted By	Downey Planning on behalf of J Murphy Group
Theme (s):	Rezone Northern Environs Drogheda
Map showing lands subject to Submission:	



Summary of Submission:

Request that lands at Beaulieu Village, Termonfeckin Road, Newtownstalan Drogheda be rezoned from Open Space (H1) to New Residential (A2).

Planning History

- Planning history of the site is outlined, there is an extant planning permission on the site (18/939) for 58 units which is phase 3 of the parent permission, development is due to commence in January 2021; and
- Lands were zoned residential as per the North Drogheda and Environs Master Plan 2006.

National, Regional and Local Planning Policy

- Rezoning of the site would be in compliance with NPO's 33 and 35 of the NPF and would assist with the delivery of the core objectives within 'Rebuilding Ireland';
- The subject lands are within the built up town of Drogheda and in proximity to many facilities thus their development would be in accordance with RPO 4.1 and RPO 4.2 of the RSES's;
- The open space rezoning represents an under utilization of serviced accessible lands;
- Land uses pertaining to the New Residential (A2) zoning are outlined; it is considered that these would complement the overall land use in the vicinity; and
- The re zoning of the site will be in keeping with policy objectives CS 2, CS6 and CS 7 as well as SS10 and SS11 of the draft Louth CDP 2021-2027.

Site Assessment and Land Use Evaluation

- Lands were zoned residential as per the North Drogheda and Environs Master Plan 2006, adjoining lands are already developed or under construction;
- Lands have access to road network , there are existing mains water and foul water connection available, they are not at risk from flooding and can be identified as 'Tier 1' serviced lands;
- Infill opportunity and their rezoning will contribute to compact growth; and
- Appropriate development of the site will provide an attractive frontage along existing road and will create passive surveillance.

Housing Needs and Delivery

- As noted in the Draft Plan, there is a projected housing requirement of 8278 units over the Plan period (2021-2027), equating to c.1379 units per year;
- The current Development Plan envisioned a delivery of c. 667 units per annum, however only c.2040 units were delivered between 2016-2020. There is pent-up demand for housing in the area. Sufficient lands with adequate headroom should be zoned for residential purposes under the new Development Plan;
- Client has a proven track record of delivering new homes; and
- In their submission to the draft Plan the OPR suggested that more population growth should be targeted to Dundalk and Drogheda.

Chief Executive's Response:

The subject lands are identified as residential lands within the Master Plan for the Northern Environs 2006. It is therefore considered that in accordance with the 2006 Master Plan these lands are zoned A2 New Residential.

Chief Executive's Recommendation:

It is recommended that the subject lands are changed from Open Space (H1) to New Residential (A2).



Section 2b: Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Dundalk

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No.	LCDP DR011
Submitted by:	Marion Casey
Theme (s):	Support Zoning Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

I welcome the fact that my land has remained in residential zoning. I would hope that there is no impediment to development of my land in the next phase.

Chief Executive's Response:

The development of the subject lands would facilitate infill development in proximity to the town centre and would support the implementation of the principle of compact growth.

Chief Executive's Recommendation

Recommendation - No change

Submission No.	LCDP DR035
Submitted by:	Frank Burke & Assoc. on behalf of Francis Bishop
Theme (s):	Rezone Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Subject lands at Priorland and Townparks, Dundalk (approximately 30ha) should be re-zoned from Strategic Reserve (L1) to New Residential (A2).

In Support:

Land was zoned as Residential 2 in then Dundalk and Environs Development Plan 2009-2015 and forms part of the South West Local Area Plan 2009-2015, it has been identified as suitable for development in previous Plans

Planning permission was previously granted (Planning Reference 07/214). Furthermore, the owner has been approached by developers on many occasions.

The submission outlines the availability of the various services:

- Water supply: Available from Portland Road and development contributions could be utilised to improve supply in the Dundalk Region.
- Surface Water: Could be discharged into Balmers Bog which could be developed as an urban wetland. Wayleaves would not be required.
- Foul sewage: Mains are available to serve other developments in the vicinity; preliminary assessment suggests that the sizing and levels of existing mains and pumping station are adequate to serve part of the site. Wayleaves are not required. In the long term a new South West Area interceptor sewer will be constructed. An interim sewage system can be provided. Extent of development on the subject lands will depend on capacity at Dundalk Treatment system.
- Roads: Lands have sufficient road frontage to provide access, road proposals will be designed to include a link to the proposed new local distributor road for the South West area. All roads, roundabouts, junctions etc. will comply with relevant guidance.
- Electricity, telecom and broadband are available in the area.

Furthermore, the proximity of existing residential development means that the subject lands are less suitable for agricultural use, the site is well connected to the road and rail network additionally there are a range of community and retail services available nearby.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town to fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The Infrastructure Assessment identified that there may be capacity in water services infrastructure to serve part of the lands the issue of water services however the development of the overall area would have to be addressed in more detail as part of the Drainage Area Plan for Dundalk being prepared by Irish Water. Taking this into account, in addition to the fact that there is an excess of residential lands in Dundalk, the lands were placed in a Strategic Reserve.

As part of the preparation of the Local Area Plan for Dundalk, a review of the land use zonings will be carried out. This will include an updated analysis and assessment of residential land availability, requirements, and infrastructure constraints. There will also be an emphasis placed on the delivery of residential land through the implementation of the Active Land Management Strategy.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation

No change

Submission No.	LCDP DR036
Submitted by:	Frank Burke & Assoc. on behalf of Patrick Bishop
Theme (s):	Re-zoning
Map showing lands subject to Submission:	



Summary of Submission

1. Subject lands at Priorland, Crumlin and Fairhill, Dundalk should be re-zoned from Strategic Reserve (L1) to Mixed Use (C1) and New Residential (A2).
2. Land was zoned as Mixed Use (EM) and Residential 2 (RES 2) in the Dundalk and Environs Development Plan 2009-2015 and forms part of the South West Local Area Plan 2009-2015 and the Dundalk and Environs Development Plan 2009-201 'Dundalk Gateway Plan'. The subject site has been identified as suitable for development in previous Plans and falls within the serviceable envelope of Dundalk. The owner has been approached by developers on many occasions.
3. The submission outlines the availability of the various services:
 - Water supply: Lands can be serviced from the existing water supply which runs along old Mullaghlin, Priorland and Inner Relief Roads. Development contributions could be utilised to improve Dundalk's water supply
 - Surface Water: Could be discharged into Balmers Bog via an existing drain which could be piped in due course. Wayleaves would not be required.
 - Foul sewage: Whilst mains are available to serve other developments in the vicinity, they do not presently serve the subject lands however a preliminary assessment shows that the sizing and levels of existing mains and pumping station are adequate. Wayleaves are not required. In the long term a new South West Area interceptor sewer will be constructed. An interim sewer network can be provided. Extent of development on the subject lands will depend on capacity at Dundalk Treatment system.
 - Roads: Lands have direct access onto a number of roads including the inner relief road. Lands have sufficient road frontage to provide access, road proposals will be designed to include a link to the proposed new local distributor road for the South West area. All roads, roundabouts, junctions etc. will comply with relevant guidance.
 - Electricity, telecom and broadband are available in the area.
4. The proximity of existing residential development means that the subject lands are less suitable for agricultural use furthermore the site is well connected to the road and rail network additionally there are a range of community and retail services available nearby.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' and 'Employment Mixed Use' in the 2009-2015 Dundalk Plan. The residential lands are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

Proposed Residential Zoning

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The Infrastructure Assessment identified that there may be capacity in water services infrastructure to serve part of the lands the issue of water services however the development of the overall area would have to be addressed in more detail as part of the Drainage Area Plan for Dundalk being prepared by Irish Water. Taking this into account, in addition to the fact that there is an excess of residential lands in Dundalk, the lands were placed in a Strategic Reserve.

As part of the preparation of the Local Area Plan for Dundalk, a review of the land use zonings will be carried out. This will include an updated analysis and assessment of residential land availability, requirements, and infrastructure constraints. There will also be an emphasis placed on the delivery of residential land through the implementation of the Active Land Management Strategy.

Proposed Change from 'Business and Technology' to 'Mixed Use'

The subject lands are located in the 'Crumlin' area of the Mullagharlin Framework Plan and are identified as an area that will accommodate a substantial employment base. The 'Business and Technology' zoning would be consistent with this vision and would be compatible with adjacent lands which have the same zoning.

Conclusion

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy.

The Business and Technology zoning is also considered appropriate for the location proposed on the subject lands and would be a more appropriate than a mixed use zoning in an employment area. It is therefore recommended that no change is made to the land use zonings.

Chief Executive's Recommendation

No Change

Submission No.

LCDP DR086

Submitted by:

EHP Services on behalf of Jim and Alice Connelly

Theme (s):

Rezone Dundalk

Map showing lands subject to Submission:



Summary of Submission

Request that lands along the Mullagharlin Road, Dundalk are rezoned from E2 Business and Technology to A1 Residential Existing.

In support:

- The residential properties have always been in residential use.
- E1 business and Technology zone is inaccurate, unachievable and contrary to proper planning and sustainable development.
- In the past LCC and ABP have held that despite existing residential use on the site, the residential use is non-conforming and contrary to the zoning objective.
- The proposed zoning will have no material impact on the policies, objectives or strategic vision of the County or Dundalk.
- It is noted that there will be a new Local Area Plan for Dundalk, however, it is considered that the zoning maps issued with the Draft Plan should correspond.

Chief Executive's Response

It is acknowledged that the subject lands are in a residential use. Section 13.9.2.4 of the Draft Plan 'Non-Conforming Uses' provides for applications to be considered that do not conform with the land use zoning. In addition 13.19.2.3 recognises that certain uses may not be listed in the list of potential uses for the land use zoning and where this arises applications will be considered on their individual merits. Taking this into account it is not considered necessary to amend the land use zoning as proposed.

Chief Executive's Recommendation

No Change

Submission No.

LCDP DR127

Submitted by:

RPS on behalf of Oxygen Environmental ULC

Theme (s):

Rezone, Additional wording to Policy

Map showing lands subject to Submission:



Summary of Submission:

- Request that lands identified above at Carnabreagh, Dundalk be rezoned from Rural Policy Zone 2 to a zoning in which Recycling Facilities (Waste) are permitted.
- It is proposed that the Plan is amended to allow for waste facilities at the Whiteriver Landfill, Dunleer (in line with Policies E11 and E18 of the Eastern- Midlands Waste Management Plan).
- Recycling Facility (Waste) should be permitted in principle or open for consideration in the following land use zonings: General Employment (E1), Public Infrastructure and Utilities (J2), Port Harbour Area (C2), Commercial and Business (C3), Regeneration (D1), Business and Technology (E2), Agriculture (K1).
- Include Recycling Facilities (Waste) as Open for consideration in Retail, Leisure and Recreation and Transportation Development Hub.
- Amendments to Chapters 10 and 11 (see below).
- Amend ENV 25 to read:
To support the development of additional recovery and recycling facilities in the Mid - Louth Area.
- Amend IU60 to read: To support and promote the development of projects that treat waste and convert to biomass to energy subject to the proper planning and environmental considerations.

In Support:

Oxygen Environmental ULC are a key provider of waste services in the north east and are dedicated to the diversion of waste from landfill through the reuse of valuable resources to create closed material life cycles.

EU Waste Framework Directive (Directive 2008/98/EC) requires Ireland to establish an adequate network of waste management installations to ensure that the State becomes self-sufficient in waste management and reduce the need for waste export. The 'principle of proximity' set out in the Directive requires that these shall be provided as near to the source as possible. Directive (EU) 2018/851, which amended the aforementioned directive, sets out targets for the re-use and recycling of waste materials.

Both Directives have been transposed into Irish Legislation through the European Union (Waste Directive) Regulations 2011-2020.

National, Regional and Local Policy

The submission includes a detailed overview of national, regional and local policy. The National Planning Framework sets out the national overarching policy position. The framework provides policies relating to waste, energy efficiency and sustainability. Page 83 of the NPF notes that waste facilities are appropriate at the scale of large towns such as Dundalk and Drogheda. National Policy Objective 56 is to sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society. NPO's 52 and 53, as well as Chapter 9, Section 5.6 are also mentioned.

The RSES's position is that development plans should identify how to reduce waste. RPO 10.25 states that, 'Development plans shall identify how waste will be reduced, in line with the principles of the circular economy, facilitating the use of materials at their highest value for as long as possible and how remaining quantum's of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food and shall take account of the requirements of the Eastern and Midlands Region Waste Management Plan'. Section 10.4 is also cited.

The Eastern and Midland Regional Waste Management Plan 2015-2021 provides the overarching waste policy and notes specific requirements for pre-treatment of waste and the provision of such infrastructure (Policy E1 and E2). The submission specifically mentions a number of specific objectives/ policies: Strategic Objective E, Policies E1, E2, E11, E17, E18 and E19.

The submission acknowledged a number of Strategic Objectives contained within the Draft Louth CDP 2021-2027 including, SO4, SO5, SO17 and SO18 and welcomes the following Policies IU44, 47, 48 and 50, 60.

The following observations in relation to the Draft Development Plan are made:

- The population of Louth is projected to grow by 21,082 in the lifetime of the Plan.
- There is currently an under provision of waste facilities in Louth. There is only one facility licensed by the EPA in Louth, for 40,000 tonnes of waste/annum (c. 55% of the waste generated by Louth). There is a clear shortfall in the Louth's capacity to treat municipal waste. Exporting municipal waste to other locations is no longer sustainable.
- The absence of any clear policies on new waste infrastructure is a serious omission and Louth County Council is requested to include clear details on this critical infrastructure in the CDP to inform future practice and development of the waste sector.
- The zoning objectives, as drafted, do not provide sufficient support for waste facilities. Such uses are only open for consideration in three land use zonings, two of which are more urban zonings and less likely to be suitable for waste facilities. It is recommended that this section is amended to provide more flexibility for 'Recycling Facilities (Waste)' across the County.
- Former landfills can be excellent sites for new waste facilities. It is proposed that the plan is amended to allow for waste facilities at the Whiteriver Landfill, Dunleer (in line with Policies E11 and E18 of the Eastern- Midlands Waste Management Plan). Whiteriver which is located in Rural Policy Zone 2 has an existing grid connection it is an ideal location for an energy based waste operation.

Having assessed the Zoning Objectives set out in Section 13.19 of the Draft Louth CDP 2021-2027, it is considered that a Recycling and Recovery Facility would most like fall under 'recycling facility (waste)', it is recommended that a definition for each use in Section 13.19 is provided. Recycling facility waste is not permitted in any of the land use zones it is only open for consideration in 3 zones all of which are located within the urban areas of Dundalk, Drogheda and Ardee and are limited to small parcels of lands on which the delivery of a Recycling and Recovery Centre would be difficult. There are also barriers to the delivery of a Recycling and Recovery Centre on lands zoned for General Employment. The zoning shows a lack of support for waste uses. There needs to be a specific zone where waste activities are a 'Generally Permitted Use'.

Chapter 10 'Infrastructure and Utilities' of the Draft Louth CDP 2021-2027 fails to address waste management infrastructure and the submission refers to details provided within the Meath CDP 2020-2026. Similarly Chapter 11 'Environment, Natural Resources and the Coast', refers to the Regional Waste Management Plan but does not express commitment to the provision of the required infrastructure. Section 11.9 refers to 'bring banks and civic amenities', but does not refer to supporting or facilitating the development of the private waste sector in managing waste in County Louth. The submission requests amendments to ENV25 and IU60 (see above).

It is requested that the land shown in Figure 1 and 2 at Carnabreagh, Dundalk is retained within a zoning in which Recycling Facilities (Waste) is permitted. It is considered that the Draft Louth CDP 2021-2027 fails to provide sufficiently for the waste industry. In doing so, it does not meet the requirements of the overarching policy and legislation.

It is considered that the amendments set out above would assist in ensuring that the Development Plan meets the aims and objectives of the overarching policy and will assist the State in meeting its waste targets.

Chief Executive's Response:

- The land use zoning of the subject lands was removed as it was considered that the Motorway is the logical development boundary for Dundalk and the future expansion of the town should be concentrated on the eastern side of the Motorway. It is therefore not considered appropriate to zone this site given that there are significant lands within the boundary of Dundalk where the zoning objective facilitates Recycling Facility (Waste) as Open for Consideration.

There is specific guidance in Chapter 5 (Section 5.19 Rural Economy) and Chapter 13 (Section 13.11.11 'Employment Development in Rural Areas') setting out the standards and criteria against which employment generating developments in the open countryside are assessed.

- Whilst the Draft Plan includes a specific policy objective for the future development of Dundalk Landfill (SS 34) it is considered that policies for other such facilities within the County (including Whiteriver) are adequately addressed by the specific guidance in Chapter 5 (Section 5.19 Rural Economy) and Chapter 13. The policy objective for the former Dundalk Landfill site is reflective of its position within the urban setting of Dundalk.
- As per point no. 1 above, Recycling Facility (Waste) is listed as a use which is Open for Consideration within a number of sites around the County. These include lands with the zoning objective General Employment (E1), Transportation Development Hub (J1) and Retail, Leisure, and Recreation (B5). It is considered that sufficient lands are covered by these zoning objects, particularly with regard to General Employment (E1) lands.
- It is noted that the submission requests an amendment to ENV 25 to support the development of additional waste recovery facilities within the County. It is considered that this may form part of a new policy objective. In relation to amendments to IU60, it is considered that this objective specifically relates to biomass and the addition of the proposed wording ('treat waste') would be inappropriate.

Chief Executive's Recommendation

Insert a new policy objective into Chapter 11 after section 11.1.9.1 Regional Waste Management Plan:

To facilitate the provision of adequate waste recovery and disposal facilities in appropriate locations, as deemed necessary in accordance with the requirements of the current Eastern Midlands Region Waste Management Plan.

Population

In the absence of national guidance on preparation of development plans a flexible approach is taken to the provision of population targets and that as per the Director's Report on the 'Regional Spatial Strategy', population growth rates should be seen as minimum targets. The 'Regional Demographic and Structural Housing Demand at County Level' (ERSI Dec2021), suggests that housing allocations are 30% lower than required. As such Louth and Dundalk may under perform in terms of achieving its population and housing targets. The lands represent a windfall site and their development should not be included in the housing land allocation figure.

It is not clear how the various figures in Table 2.4 of the Core Strategy are derived, furthermore it would appear that Column H includes 'one off' houses, which should not be included in overall allocation.

The site adjoins residential development, is in proximity to town centre and a range of community facilities in the vicinity. If the Tiered Assessment had been applied the submission lands would have been given a very good score.

Chief Executive's Response:

The subject lands are currently zoned and used for community based uses. Whilst it is acknowledged the lands are privately owned, they are an important resource of outdoor space for the local community.

The creation of a sustainable urban community involves the provision of a suitable mix of uses and facilities to meet the needs of people of all ages. It is therefore important that housing is not the only type of development promoted on infill and brownfield sites in that there should be sufficient lands available for open space and community type uses. If the policy of compact growth is to be successfully implemented it is important that local neighbourhoods provide residents with a quality and attractive environment and a balance is achieved in providing the required social and community infrastructure in association with any residential growth. With this in mind it is considered that the land use zoning 'Community Facilities' should be retained in order to continue to provide for community type uses in this location. As part of the preparation of the Local Area Plan for Dundalk this can be examined in greater detail.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR138
Submitted By	Stephen Ward on behalf of Birch's Lane Developments Limited
Theme (s):	Rezone Dundalk - Core Strategy
Map showing lands subject to Submission:	



Summary of Submission:

Submission relates to a parcel of land (8ha), at Birch's Lane, Blackrock, Dundalk, the submission request, the rezoning of lands from Strategic Reserve (L1) to New Residential (A2).

In Support:

Context

ABP granted permission for 480 units on an adjoining site to the north (Ref: ABP-304782-19), the lands under consideration are better related to the village centre than the aforementioned site.

Tiered Assessment

The Tiered Assessment in Appendix 2 of the Draft Louth CDP 2021-2027 is rudimentary and simplistic.-The submission lands scored poorly in relation to 'proximity to the town centre, contribution to consolidated/ compact growth', yet ABP granted permission for 480 units on an adjoining site (Ref: ABP-304782-19). Furthermore, the Tiered Assessment does not have regard to the likelihood of lands becoming available for development, nor the proximity to neighbourhood centres.

Community Facilities

There are a range of community facilities in proximity to the site, map attached.

Brexit and Housing Demand - Draft Louth CDP 2021-2027

Neither the Draft Louth CDP 2021-2027, housing strategy nor any supporting documentation reference businesses wishing to set up in Dundalk as a result of Brexit and the subsequent increase in demand for housing. It is considered that there is an under provision of housing and this will impact on Dundalk's ability to grow to a population of 50,000 as per the RSES.

Population

In the absence of national guidance on preparation of development plans a flexible approach should be taken to the provision of population targets and that population growth rates should be seen as minimum targets. The 'Regional Demographic and Structural Housing Demand at County Level' (ERSI Dec2021), suggests that housing allocations are 30%/8000 units lower than required.

As such Louth and Dundalk may under perform in terms of achieving their population and housing targets.

Core Strategy

As per Chapter 2, Table 2.9 the Draft Louth CDP 2021-2027 it is envisaged that there will be a reduction in the rate of population growth in the County and Dundalk over this Plan period, this will conflict with the role of Dundalk as a Regional Growth Centre and result in a decline of surrounding areas.

It is not clear how the various figures in Table 2.4 of the Core Strategy are derived. Neither brownfield / infill sites nor 'one off' houses should be included within the housing land allocation.

A 'de-zone' strategy for Dundalk should not be employed instead a 'plan- monitor-manage' approach should be adopted, this would offer greater flexibility. The Strategic Reserve zoning does not apply to any lands in the Drogheda area, all lands zoned residential are retained.

Services

Report from Waterman Moylan Engineering Consultants states that access and watermain are available along Birch's Lane, matter pertaining to surface water drainage can be dealt with and water drainage constraints are to be resolved by Irish Water in the next year or so. It concludes that the subject site can be adequately serviced to facilitate development.

Chief Executive's Response

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk and Blackrock. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The Council would strongly dispute the claims put forward in the submission that the ranking of sites in the Land Use Evaluation were pre-determined. Whilst it is acknowledged that there is an extant permission on the lands to the north recently granted planning permission by An Bord Pleanála the Land Use Evaluation identified that there are more suitably located lands closer to the town centre that would rank higher with regards to the sequential approach to development and infill and backland development.

The Infrastructure Assessment also identified water services constraints in the area.

Population Targets

The Chief Executive is fully aware of the fact that the population target of 50,000 for Drogheda and Dundalk by 2031 is not a cap. However there is also a requirement to prepare development plans in accordance with national and regional policy, and in this regard the CE has been provided with figures for population and housing to meet the growth trajectory for the County set out in the National Planning Framework.

The CE would not agree with the assertion made in the submission that the growth of Dundalk is being constrained by placing lands in a strategic reserve. The zoning of excess lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is envisaged that a more active land management approach will be taken over the life time of the plan to ensure the delivery of housing units in a timely manner and to avoid a scenario of core strategy figures being depleted through inactive extant permissions.

The submission refers to the population projections being lower than that in preceding years. This is not the case. Between 2006-16 the population of the County increased by 17,617 persons whilst the projected population increase between 2016-2027 is 21,082 persons. This is set out in Table 2.8 of the Draft Plan.

The CE would not agree with the statement that the population and housing allocations for Dundalk show a lack of ambition. What is important when preparing a development plan is to ensure they are evidence-based. Whilst the CE would welcome the successful growth of both Regional Growth Centres in delivering economic, population, and residential growth any growth projections must be factually based and realistic. In addition consideration must be given to the fact that international migration is a key driver for population growth.

This is particularly relevant in the context of the potential impacts of Covid-19 on population growth due to restrictions on travel which may have longer term impacts on immigration levels. Taking all these factors into account the Council is satisfied the population projections for the Regional Growth Centres are achievable, ambitious, and in accordance with national and regional policy.

Infill and Brownfield Lands

The submission indicates that infill and brownfield lands should not be included in the housing allocation and treated as 'windfall' sites. National policy requires 30% of housing to be delivered on infill and brownfield sites in order to achieve compact growth.

Calculating the quantum of land that can be provided on such lands is therefore a critical element of the identification of total residential lands required in a settlement and the overall County.

Strategic Reserve in Drogheda

The submission raises the issue that there is a contrast in policy in Drogheda and Dundalk in that there are no lands in Drogheda identified in a Strategic Land Reserve. Section 2.13.6 of the Draft Plan acknowledges there is an extensive quantum of residential lands in the Northern Environs of Drogheda. There are a large number of extant planning permissions on these lands most of which have commenced development, therefore it was not considered appropriate to place any of these lands in a Strategic Reserve having regard to the phasing arrangement already in place. This issue will be addressed in greater detail as part of the Joint Local Area Plan for Drogheda.

Core Strategy Table

Queries were raised with regard to the figures in the Core Strategy Table relating to infill and brownfield land and the total lands available for development in each settlement. In this regard the Forward Planning Team reviewed the potential lands within each settlement that could deliver infill and brownfield development. In identifying Greenfield residential lands cognisance was given to the fact that there may be long term challenges in the development of some infill and brownfield lands. With regard to greenfield lands in accordance with the RSES there was not an overdependence on strategic lands with long term development potential over lands more likely to deliver development in the short term. This was carried out in the context of the projected housing demand as set out in the Core Strategy.

Housing Strategy

Queries were raised with regard to the figures for projected households in Table 4.3 and Table 2.14. Section 2.6.5 in Chapter 2 'Core and Settlement Strategy clearly sets out how the projected housing allocation was calculated.

Brexit

The Draft County Development Plan has considered the implications of Brexit. There is a strong narrative and supporting policy objectives with regard to dealing with the potential challenges and opportunities around the UK's withdrawal from the EU. The submission fails to include any evidence base to support the statement that Brexit will result in an under-provision of housing in the area.

Conclusion

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy.

The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. The population and housing projection for Dundalk is consistent with national and regional policy and the quantum of residential lands identified will meet the projected housing demand during the life of the Plan. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR0139
Submitted By	Stephen Ward on behalf of McParland Builders (IRE) Ltd
Theme (s):	Re- zoning Dundalk - Core Strategy
Map showing lands subject to Submission:	



Figure 1 - Site Location Map

Summary of Submission:

The submission requests: The rezoning of lands (20ha) from Strategic Reserve (L1) to New Residential (A2) west of Dowdallshill GAA Club in Dundalk

In support:

Context

2.5ha of the submission lands are to be given to Dowdallshill GAA. A future link road which is an objective of the Draft Louth CDP 2015-2021 will form the northern boundary of the site beyond which there is a live permission for a business park (Planning reference 20/122). Re-zoning of submission lands to residential will improve the financial viability of the link road.

Brexit and Housing Demand

Neither the Draft Louth CDP 2021-2027, housing strategy nor any supporting documentation reference businesses wishing to set up in Dundalk as a result of Brexit and the subsequent increase in demand for housing.

It is considered that there is an under provision of housing and this will impact on Dundalk's ability to grow to a population of 50,000 as per the RSES. Residential lands to the north of Dundalk have been rezoned Strategic Reserve thereby creating an imbalance between the location of employment and residential lands. In terms of sustainable development people should live close their work.

Community Facilities

There are a range of community facilities in proximity to the site, map attached. Furthermore this re-zoning would create an opportunity for the western expansion of Dowdallshill GAA, there is considerable community gain in this element of the proposal.

Population

In the absence of national guidance on preparation of development plans a flexible approach should be taken to the provision of population targets and that population growth rates should be seen as minimum targets. The 'Regional Demographic and Structural Housing Demand at County Level' (ERSI Dec2021), suggests that housing allocations are 30% / 8000 units lower than required. As such Louth and Dundalk may under perform in terms of achieving their population and housing targets. Marginal population growth rates for Dundalk and Drogheda will result in under performance and will conflict with the objectives of the Regional Growth Centres and result in a decline of surrounding areas.

Core Strategy

As per Chapter 2, Table 2.9 the draft Louth CDP 2021-2027 it is envisaged that there will be a reduction in the rate of population growth in the County and Dundalk over this Plan period, this will conflict with the role of Dundalk as a Regional Growth Centre.

It is not clear how the various figures in Table 2.4 of the Core Strategy are derived. Neither brownfield / infill sites nor 'one off' houses should be included within the housing land allocation.

A 'de-zone' strategy for Dundalk should not be employed instead a 'plan- monitor-manage' approach should be adopted, this would offer greater flexibility. The Strategic Reserve zoning does not apply to any lands in the Drogheda area, all lands zoned residential are retained.

Tiered Assessment

The submission lands are included within Site 6 of the Tiered Assessment in Appendix 2 of the Draft Louth CDP 2021-2027, it is rudimentary and simplistic. It does not have regard to the likelihood of lands becoming available for development, nor the proximity to neighbourhood centres. It is not satisfactory to take a broad brush approach to lands in multiple ownership with various characteristics. If a more refined approach to tiered assessment was undertaken the lands subject to this submission would have a very low (good) score.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The subject lands are on the northern edge of Dundalk. There are other, more suitable lands available for residential development closer to the town centre follow the principles of sequential development. The zoning of these lands for residential development would result in a dispersed pattern of development which would be contrary to national and regional policy which requires the creation of more compact settlements.

The Infrastructure Assessment also identified a number of constraints with regards to roads and water services infrastructure in the area.

The Council would strongly dispute the claims put forward in the submission that the ranking of sites in the Land Use Evaluation were pre-determined. There are more suitably located lands closer to the town centre that would rank higher with regards to the sequential approach to development and infill and backland development. The Infrastructure Assessment also identified water services constraints in the area.

Community Facility

The proposal to allocate 2.5ha of the lands to the expansion of Dowdallshill GAA club is noted however the fact remains that there are other overriding planning principles that must be considered in evaluating the requirement and appropriateness of zoning these lands for residential development at this time.

Population Targets

The CE is fully aware of the fact that the population target of 50,000 for Drogheda and Dundalk by 2031 is not a cap. However there is also a requirement to prepare development plans in accordance with national and regional policy, and in this regard the CE has been provided with figures for population and housing to meet the growth trajectory for the County set out in the National Planning Framework.

The CE would not agree with the assertion made in the submission that the growth of Dundalk is being constrained by placing lands in a strategic reserve. The zoning of excess lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy.

The submission refers to the population projections being lower than that in preceding years. This is not the case. Between 2006-2016 the population of the County increased by 17,617 persons, whilst the projected population increase between 2016-2027 is 21,082 persons. This is set out in Table 2.8 of the Draft Plan.

The CE would not agree with the statement that the population and housing allocations for Dundalk show a lack of ambition. What is important when preparing a development plan is to ensure it is evidence based. Whilst the CE would welcome the successful growth of both Regional Growth Centres in delivering economic, population, and residential growth any growth projections must be factually based and realistic.

In addition consideration must be given to the fact that international migration is a key driver for population growth. This is particularly relevant in the context of the potential impacts of Covid-19 on population growth due to restrictions on travel which may have longer term impacts on immigration levels. Taking all these factors into account the Council is satisfied the population projections for the Regional Growth Centres are achievable, ambitious, and in accordance with national and regional policy.

Infill and Brownfield Lands

The submission indicates that infill and brownfield lands should not be included in the housing allocation and treated as 'windfall' sites. National policy requires 30% of housing to be delivered on infill and brownfield sites in order to achieve compact growth. Calculating the quantum of land that can be provided on such lands is therefore a critical element of the identification of total residential lands required in a settlement and the overall County.

Strategic Reserve in Drogheda

The submission raises the issue that there is a contrast in policy in Drogheda and Dundalk in that there are no lands in Drogheda identified in a Strategic Land Reserve. Section 2.13.6 of the Draft Plan acknowledges there is an extensive quantum of residential lands in the Northern Environs of Drogheda. There are a large number of extant planning permissions on these lands most of which have commenced development therefore it was not considered appropriate to place any of these lands in a Strategic Reserve having regard to the phasing arrangement already in place. This issue will be addressed in greater detail as part of the Joint Local Area Plan for Drogheda.

Core Strategy Table

Queries were raised with regard to the figures in the Core Strategy Table relating to infill and brownfield land and the total lands available for development in each settlement. In this regard the Forward Planning Team reviewed the potential lands within each settlement that could deliver infill and brownfield development. In identifying Greenfield residential lands cognisance was given to the fact that there may be long term challenges in the development of some infill and brownfield lands.

With regard to greenfield lands in accordance with the RSES there was not an overdependence on strategic lands with long term development potential over lands more likely to deliver development in the short term. This was carried out in the context of the projected housing demand as set out in the Core Strategy.

Housing Strategy

Queries were raised with regard to the figures for projected households in Table 4.3 and Table 2.14. Section 2.6.5 in Chapter 2 'Core and Settlement Strategy clearly sets out how the projected housing allocation was calculated.

Brexit

The draft County Development Plan has considered the implications of Brexit. There is a strong narrative and supporting policy objectives with regard to dealing with the potential challenges (and opportunities) around the UKs withdrawal from the EU. The submission fails to include any evidence base to support the statement that Brexit will result in an under-provision of housing in the area.

Conclusion

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy.

The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. The population and housing projection for Dundalk is consistent with national and regional policy and the quantum of residential lands identified will meet the projected housing demand during the life of the Plan. The subject lands are located on the periphery of Dundalk and would result in the creation of a dispersed pattern of development. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR142
Submitted By	Stephen Ward on behalf of Frank and Ronan McArdle
Theme (s):	Rezone Dundalk - Core Strategy
Map showing lands subject to Submission:	



Summary of Submission:

Submission relates to a parcel of land 23ha it requests the rezoning of lands from Strategic Reserve (L1) to New Residential (A2).

In Support:

Context

There are permissions for a c. 580 residential units, neighbourhood centre, school and crèche on the lands pertaining to this submission (planning reference 08/50189 as extended under 18/1061 expiring 11/12/2024 and 08/1013 as extended under 18/1060 expiring on 22/11/2024). Development is due to commence in 2021 and the developer is concerned that permissions would expire prior to building out of entire development and important elements such as the school etc. would not be realised. Strategic reserve zoning would not facilitate new permissions. Furthermore, the reserved site for the school, crèche and neighbourhood centre remains in place on the zoning map despite the removal of the residential zoning.

Tiered Assessment

The submission lands are included within 'Site 6' of the tiered assessment in Appendix 2 of the Draft Louth CDP 2021-2027. There is no rationale for applying the system over such a large expanse of land. In this instance the submission lands have direct access to the public road system, footpaths and lighting, they can be drained and all utilities are available, yet parts of Site 6 have none of these facilities. Furthermore, the lands scored poorly in relation to 5 other headings, however the subject lands themselves contribute to urban consolidation and compact growth. The broad brush approach to the site availability assessment is unsuitable

The Tiered Assessment in Appendix 2 of the Draft Louth CDP 2021-2027 is rudimentary and simplistic.–It does not have regard to the likelihood of lands becoming available for development nor the proximity to neighbourhood centres. It is not satisfactory to take a broad brush approach.

Community Facilities

There are a range of community facilities in proximity to the site, map attached.

Brexit and Housing Demand

Neither the Draft Louth CDP 2021-2027, housing strategy nor any supporting documentation reference businesses wishing to set up in Dundalk as a result of Brexit and the subsequent increase in demand for housing. It is considered that there is an under provision of housing and this will impact on Dundalk's ability to grow to a population of 50,000 as per the RSES.

Population

In the absence of national guidance on preparation of development plans a flexible approach should be taken to the provision of population targets and that population growth rates should be seen as minimum targets. The 'Regional Demographic and Structural Housing Demand at County Level' (ERSI Dec2021), suggests that housing allocations are 8,000 units lower than required.

As such Louth and Dundalk may under perform in terms of achieving their population and housing targets. Marginal population growth rates for Dundalk and Drogheda will result in under performance and will conflict with the objectives of the Regional Growth Centres and result in a decline of surrounding areas.

Concern expressed that national policy will emerge stating that extant permissions should be considered as committed development.

Core Strategy

As per Chapter 2, Table 2.9 the Draft Louth CDP 2021-2027, it is envisaged that there will be a reduction in the rate of population growth in the County and Dundalk over this Plan period, this will conflict with the role of Dundalk as a Regional Growth Centre

It is not clear how the various figures in Table 2.4 of the Core Strategy are derived. Neither brownfield / infill sites nor 'one off' houses should be included within the housing land allocation.

A 'de-zone' strategy for Dundalk should not be employed instead a 'plan- monitor-manage' approach should be adopted, this would offer greater flexibility. The Strategic Reserve zoning does not apply to any lands in the Drogheda area, all lands zoned residential are retained.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

It is noted however that there is an extant permission on these lands that does not expire until 2024. In consideration of this issue it is considered appropriate to reinstate the zoning on these lands to A2 'New Residential'.

This zoning will, however be reviewed as part of the preparation of the Local Area Plan for Dundalk in accordance with the principles of compact growth and sequential development.

Other Issues

It is not considered necessary to address the other issues raised in this submission. These have been addressed in response to submissions no.'s. 138 and 139.

Conclusion

In conclusion it is acknowledged that there is an extant permission on the subject lands. Taking this into account it is considered that this is reflected in the land use zoning. Part of the lands will be recommended to be zoned A2 'New Residential Phase 1' with the remaining lands A3 'New Residential Phase 2'.

Chief Executive's Recommendation:

Change the zoning of the subject lands from L1 'Strategic Reserve' to A2 'New Residential Phase 1' and A3 'New Residential Phase 2'. See the proposed zoning Map for Dundalk in Appendix 6 for details of the lands in New Residential Phase 1 and New Residential Phase 2.

Submission No:	LCDP DR167
Submitted By	EHP on behalf of Mr Brendan Sharkey
Theme (s):	Re- zoning Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Request that Greengates shop site (including a customer parking area and rear service yard) which is located at the junction between Clermont and Dublin Roads is included within the settlement boundary and rezoned from Rural Policy Zone 2.

In Support:

- Greengates shop is an established local shop providing a vital service to the local community and any future residents. In effect any future application would be considered in a rural rather than urban context. Given the role and floorspace constraints of a 'local shop' as outlined in the Dundalk and Environs Development Plan 2009-2015 and Retail Planning Guidelines 2012 and, also having regard to the constraints of the site, it is recognised that the business cannot or should not expand beyond its defined role as a local shop.
- The proposed revision will not materially or adversely impact on policy objectives outlined in the draft Louth CDP 2021-2027. However it will preserve the site position within the town's retail hierarchy and allow the site to form part of the future conservation relating to Dundalk's Local Area Plan.

Chief Executive's Response:

Under the 2009-15 Dundalk Development Plan the subject lands were zoned 'Agriculture'.

In re-defining the development boundary of Dundalk it was considered that the previously zoned agricultural lands should be omitted so as to clearly define the urban boundaries of Dundalk, a regional growth centre. The site is located on lands zoned for agricultural and this will continue to be the situation albeit on lands in the 'open countryside' rather than being zoned specifically for agriculture.

It is acknowledged that there is an established retail outlet on the site and any proposals for refurbishment or redevelopment would have regard to the permitted use on the site and be consistent with the provisions of the Retail Planning Guidelines. . Section 13.19.2.4 of the Draft County Development Plan 2021-2027 sets out how 'Non-conforming uses' i.e. established uses that do not conform to the zoning of the lands will be assessed.

In this regard such proposals will take account of the general principles of proper planning and sustainable development.

Taking this into account it is not considered necessary to amend the land use zoning as requested.

Chief Executive's Recommendation:

No Change

Submission No: LCDP DR185

Submitted By

Genesis Planning Consultants on behalf of
PJ and EJ Doherty

Theme (s):

Support Zoning Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Support for subject lands which are designated Existing Residential (AI) in the Draft Louth CDP 2021-2027, it is stated:

This designation is appropriate going forward. In the context of the SHD proposals being progressed to deliver housing units it is requested the Planning Authority continue to include the subject lands within the settlement envelope of Dundalk and maintain this zoning.

Chief Executive's Response:

The development of the subject lands would facilitate infill development and would support the implementation of the principle of compact growth.

Chief Executive's Recommendation:

No Change

Submission No:

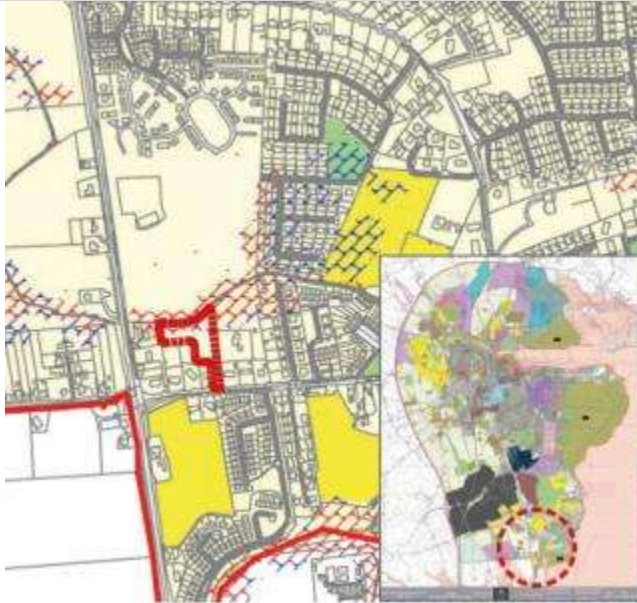
LCDP DR186

Submitted By

Genesis Planning Consultants on behalf of PJ and EJ Doherty

Theme (s):

Support Zoning Dundalk

Map showing lands subject to Submission:**Summary of Submission:**

Support for subject lands which are designated Existing Residential (A1) in the Draft Louth CDP 2021-2027, it is stated:

This designation is appropriate going forward. In the context of the SHD proposals being progressed to deliver housing units it is requested the Planning Authority continue to include the subject lands within the settlement envelope of Dundalk and maintain this zoning.

Chief Executive's Response:

The development of the subject lands would facilitate infill development and would support the implementation of the principle of compact growth.

Chief Executive's Recommendation:

No Change

Submission No:**LCDP DR204**

Submitted By

Anna Whately

Theme (s):

Rezone Ballybarrack

Map showing lands subject to Submission:**Summary of Submission:**

Rezoning of 2 properties at Ballybarrack from Strategic Reserve to Residential. Strategic reserve is unduly restrictive as it is intended to restore gatehouse.

Chief Executive's Response:

As per the map submitted both dwellings are in situ therefore there is no objection to the rezoning of this site to Existing Residential (A1).

Chief Executive's Recommendation:

Volume 1a. Dundalk draft zoning and flood maps/ composite map

Amend to re zone sites to Existing Residential

Submission No:**LCDP DR0206**

Submitted By

McCutcheon Halley Planning on behalf of Client,
McGarrell Reilly Group

Theme (s):

Support of Zoning Dundalk - Additional Policy Objective

Map showing lands subject to Submission:

Summary of Submission:

Support of the A1 Existing Residential' zoning.

Required additional policy objective be included:

“To promote sustainable development, a range of densities appropriate to the scale of settlement, site location, existing built form, accessibility to public transport and community facilities will be encouraged”

In Support

Planning Context

- Detailed analysis of the National and Regional planning context was conducted.
- Under the Dundalk and Environs Development Plan 2009-2015, the subject land is zoned Residential 1 (RES 1).
- Variation No. 1 to Dundalk and Environs Development Plan 2009-2015 Core Strategy introduced a phased approach. It was determined that upon expiration of any planning permissions on land zoned 'Residential 1', the lands shall revert to Phase 2 unless located within the area identified as 'Consolidation of the Urban Core' or 'Phase 1' in Map B of the Core Strategy
- The wider lands in Marlmount, which include the subject site, benefitted from an extant planning permission when Variation No. 1 was adopted on 29th August 2011 (03/1754 for 1450 dwelling, commercial units, community centre, reserved site for a primary school and 5 no. reserved sites for crèches, as well as the construction of the proposed distributor road between Clermont Road and Marlbog Road and all associated site works). 10 year extension of duration under Reg. Ref. 15/91 to 5th April 2020.
- 151 no. houses are now complete. Planning permission for a further 80 no. dwellings permitted under Reg. Ref. 19/804 (62 no. units, together with public open space and associated site works) and Reg. Ref. 20/856 (18 no. units, public open space and associated site works).
- During the lifespan of the parent permission, significant works were also undertaken on 2 sectors of land. Lands accord with the definition of brownfield / infill sites thus they are excluded from the phasing approach set out in Variations No.1.

Draft Louth County Development Plan 2021-2027

Submission includes a detailed overview of the Draft Louth County Development Plan 2021-2027, SO1, 2 and 3 are specifically mentioned, as is the Core Strategy and housing need sections of the Draft Louth CDP 2021-2027. The figures in Tables 2.7, 2.9 and 2.14 of the Draft Louth CDP 2021-2027 have been analysed. There may be anomalies between NPF/RSES growth projections and the information published by the CSO, however, it is concluded that the population of Ireland will grow substantially.

Zoning of subject lands to Residential existing is deemed appropriate and consistent with CS6 and Section 5.12 of the Draft Louth County Development Plan 2021-2027. As per Table 3.2 of the Draft Louth CDP 2021-2027 a minimum of 35units/ ha would be the recommended density. Having regard to Sections 13.11 and 13.9.26, the subject lands are not considered to be a suitable location for high density development. Thus it is recommended that a specific policy regarding density is included, see above.

Chief Executive's Response:

The zoning of the subject lands would facilitate the build out of the Marlmount development that has been under construction for a significant period of time. There has been significant development in enabling infrastructure to facilitate the development of these lands.

Additional Policy Objective

It is not considered necessary to include the suggested policy objective regarding densities. It is considered that this issue is sufficiently addressed in section 3.11 'Densities' in Chapter 3 and in section 13.9 of the Development Management Guidelines 'Housing'.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR0209

Submitted By

Stephen Ward on behalf of P Monahan

Theme (s):

Rezone Dundalk - Core Strategy

Map showing lands subject to Submission:



Summary of Submission:

Submission relates to a parcel of land (3.2ha), abutting the Lis na Dara development to the north and west, Dundalk, the submission requests:

- The rezoning of lands from Strategic Reserve (L1) to New Residential (A2).

In Support:

Context

In 2008 planning permission granted for c92 dwellings (Planning Ref 08520060). In 2019 under PA Ref 19/918 a 'time extension' permission was granted for that part of the Lis Na Dara development immediately east.

Having regard to the pattern of surrounding development the lands would be suitable for residential development and would 'round off' of the Lis Na Dara development.

Tiered Assessment

The Tiered Assessment in Appendix 2 of the Draft Louth CDP 2021-2027 is rudimentary and simplistic.–The lands are located within ‘Site 10’ and if assessed independently they would have received a better score in relation to Proximity to the Town Centre, contribute to consolidated and compact development and infill/backland. The lands submission would receive a very low (good) score by way of a more refined and site specific assessment

Community Facilities

There are a range of community facilities in proximity to the site, map attached.

Brexit and Housing Demand

Neither the Draft Louth CDP 2021-2027, housing strategy nor any supporting documentation reference businesses wishing to set up in Dundalk as a result of Brexit and the subsequent increase in demand for housing. It is considered that there is an under provision of housing and this will impact on Dundalk’s ability to grow to a population of 50,000 as per the RSES.

Population

In the absence of national guidance on preparation of development plans a flexible approach should be taken to the provision of population targets, population growth rates should be seen as minimum targets. The ‘Regional Demographic and Structural Housing Demand at County Level’ (ERSI Dec2021), suggests that housing allocations are 30%/8000units lower than required. As such Louth and Dundalk may under perform in terms of achieving their population and housing targets. Marginal population growth rates for Dundalk and Drogheda will result in under performance and will conflict with the objectives of the Regional Growth Centre’s.

Core Strategy

As per Chapter 2, Table 2.9 the Draft Louth CDP 2021-2027 it is envisaged that there will be a reduction in the rate of population growth in the County and Dundalk over this Plan period, this will conflict with the role of Dundalk as a Regional Growth Centre and result in a decline of surrounding areas.

It is not clear how the various figures in Table 2.4 of the Core Strategy are derived. Neither brownfield / infill sites nor ‘one off’ houses should be included within the housing land allocation.

A ‘de-zone’ strategy for Dundalk should not be employed instead a ‘plan- monitor-manage’ approach should be adopted, this would offer greater flexibility. The Strategic Reserve zoning does not apply to any lands in the Drogheda area, all lands zoned residential are retained.

Services

Report from Waterman Moylan Engineering Consultants states that access is available from the Lis na Dara Development. There are existing water mains, foul and surface water sewers within Lis na Dara. A connection agreement would be required from Irish Water. It concludes that the subject site can be adequately serviced to facilitate development.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The Council would strongly dispute the claims put forward in the submission that the ranking of sites in the Land Use Evaluation were pre-determined. Whilst Site 10 in the IALUE includes a wide area of land, the general location of the lands was considered in providing the ranking score.

It is acknowledged however that there was a previous permission granted on the lands under planning reference 08/520060 which was to be accessed via the Lis na Dara residential development, which remains under construction. Taking this into account in addition to the proximity of these lands to the town centre the suitability of these lands for residential development is acknowledged. In this regard there would be no objections to identifying these lands as 'A3 New Residential – Phase 2'.

Other Issues

The other issues raised in this submission have been addressed in response to submissions no.'s. 138 and 139.

Chief Executive's Recommendation:

Change the zoning from L1 Strategic Reserve to A3 New Residential – Phase 2

Submission No:	LCDP DR0212
Submitted By	Stephen Ward on behalf of Dundalk Grammar School
Theme (s):	Add to 'permitted uses' - Spot Objective
Map showing lands subject to Submission:	



Summary of Submission:

The submission lands extend to c. 4.1 hectares and are identified edged yellow on the site location map above.

This submission seeks the following:

- i. The attachment of a Spot Objective to the Dundalk Grammar School Lands at “Hill Street” for the provision of a Sports and Recreational facility of a Regional Scale on the lands.
- ii. An amendment to the permitted uses under C1 zoning objective affecting the Grammar School lands at “Hill Street” to include the use category ‘Sports Recreation/Sports facility’ as a permissible use.

In Support:

- The subject lands at Hill Street / Dublin Road were recently purchased by Dundalk Grammar School CLG as part of its expansion programme (they have also entered into a wayleave agreement with Louth County Council to facilitate the construction of a pipeline across the lands as part of essential flood alleviation works in the area).
- A Masterplan under preparation for the Hill Street lands to develop a state of the art sports and recreational facility of regional significance and including a low-impact ecological park stretching into the Balmers Bog area.
- In order to fund the project, Dundalk Grammar School intends to release 6.23 hectares of lands in its ownership to the south of the ‘Carrick Road’ for residential development. Submission has been made seeking the rezoning of the Carrick Road lands from G1 – Community Facilities and H1 Open Space to A2 New Residential (sub no. 129)
- Lands are ideally located for a sports/recreational facility as they immediately abut the existing school, are located along Dublin – Belfast Economic Corridor within Dundalk’s town centre. Furthermore a substantial proportion of Dundalk’s population lives within a 2.5km radius and the site is in proximity to various forms of public transport and is accessible to major employment areas.

- Sports/recreational facility would be available to the public.
- The sports/recreational would advance Dundalk's position as a RGC. It is consistent with National Policy Objectives 26, 27, 44 and Section 6.2 of the NPF.
- Its development would also be compliant with the 'National Physical Activity Plan for Ireland as well as 'National Sports Policy' and 'People, Place and Policy – Growing Tourism to 2025', the latter two acknowledge the contribution sports can make to tourism.
- A sports/ recreation facility in this location would be compliant with RPO's 9.14, 9.15, 9.16, 9.17, 9.19 and 9.20 of the RSES and consistent with Policy Objectives SC 16 and CS 18, SC20, SC 25 and 26 of the draft Louth County Development Plan 2021-2027,
- The attachment of a spot objective to the lands to provide for a sport / recreation facility of regional scale and expansion of permissible uses to include sports / recreational uses would copper-fasten Dundalk Grammar School as a key educational provider in Dundalk and the wider region which would be fully in keeping with the community and education policies and objectives as set out at Chapter 4 of the Draft Development Plan.

Chief Executive's Response:

The subject lands consist of 2 land use zonings – C1 'Mixed Use' and H1 'Open Space'. Whilst the primary focus of the Mixed Use Zoning Objective is to support the provision of commercial, business, and residential uses, there would be no objections to the utilization of such lands for a community use such as a sports and recreational facility.

In this regard the guidance for the 'Mixed Use' zoning category in section 13.19.12 could be expanded to include a reference to the provision of community facilities being open for consideration.

The expansion of the uses 'open for consideration' on 'mixed use' lands in addition to the fact that there is provision in the Plan for uses not listed in the 'Generally Permitted' and 'Open for Consideration' categories (Section 13.19.2.3) would mean any application for a Sports and Recreational Facility on Mixed Use lands could be positively considered, subject to compliance with the relevant standards and criteria. It is therefore not considered that a Spot Objective would be required on these lands.

Chief Executive's Recommendation:

Insert the following additional text into section 13.19.12: Mixed Use (C1)

After the 4th paragraph insert the following:

"Consideration may be given to the use of mixed use lands for community or recreational facilities in certain circumstances where such a use or facility would have a wider social and/or community benefit."

Amend the list of '**Open for Consideration**' uses on Mixed Use zoned lands (section 13.19.12) as follows:

Advertisements and Advertising Structures, Amusement Arcade, Betting Office, Crematorium, Funeral Home/Mortuary, Garden Centre, Health Care Centre, Healthcare Practitioner, Nightclub, **Recreational/Sports Facility**, Recycling Facility (Civic & Amenity), Service Station, Taxi Office, Traveller Accommodation.

Submission No:	LCDP DR261
Submitted By	Genesis Planning on behalf of James Loughran
Theme (s):	Rezone Dundalk - Development Matrix
Map showing lands subject to Submission:	



Summary of Submission:

The submission relates to 11.5ha of land along Marlbog Road (L3167) in the Haynestown area of Dundalk. In the Draft Louth CDP 2021-2027 the subject lands are designated as 'Strategic Reserve L1' and the submission requests:

- The Planning Authority to include the subject lands within the settlement envelope for Dundalk.
- The entirety subject lands are zoned for A2 New Residential.
- The Development Management Zoning Matrix permits alternative uses to be acceptable in principle and open for consideration

In Support:

Submission provides particulars concerning the national and local importance of the site's location.

A detailed analysis of national, regional and local policy is provided. It is stated that the subject lands should be prioritised for development as this would be compliant with Objectives 2b, 3a,3b, 4, 5, 6, 7, 11, 13, 35, 44 of the NPF.

In relation to regional policy the submissions states that the subject site is within the settlement boundary of Dundalk, zoning for residential purposed would be consistent with the objectives set down by the RSES, RPO 3.3, 4.78 and 4.83 are specifically mentioned. Development of the site will increase the number of residential units available in a sustainable manner. Development of the site for residential purposes would also be compliant with the zoning objectives as set out both in the Louth County Development Plan 2015-2021 and the Dundalk & Environs Development Plan 2009- 2015.

The submission provides a comprehensive study of the site context and local connections, it is in proximity to sport facilities, education facilities, large scale employers furthermore there are existing footpath cycleways and public transport links

In terms of sequential development the submissions claims the site is appropriate, given that:

- The expanse of lands to the north are currently zoned and developed for industrial development, with a significant bio-pharmaceutical campus already constructed directly opposite the subject lands and employing over 400 persons.
- The site is directly accessible from the existing road infrastructure
- The site is serviceable
- The site is included within a the settlement boundary of Dundalk
- The site is currently zoned within the extended DEDP Core Strategy for residential use.
- The site is sequential appropriate in that the proximate location is directly south of the IDA lands.

An analysis of population growth of the State, the Greater Dublin Area (GDA), Co Louth, Dundalk & Environs and also Haggardstown ED was undertaken. The housing market and vacancy rates were also examined. The evaluation concluded that there is a shortage of residential units and development of the subject lands for residential purposes should be supported.

An overall design concept and phasing strategy for the site (2no. phases) has been provided. It is stated that an SHD proposal for the site is currently being developed, details are provided regarding housing numbers and mix.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/ constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

Whilst it is acknowledged there are community facilities including a Gaelic Club and national school adjacent to the site, the lands are removed from the established built up area of Dundalk and Blackrock and the development of these lands would not result in a sequential pattern of development.

The Infrastructure Assessment identified that there is limited capacity in water services infrastructure and potential solutions to constraints will be identified as part of the Drainage Area Plan currently being prepared. Taking this into account, in addition to the fact that there is an excess of residential lands in Dundalk, the lands were placed in a Strategic Reserve.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. The subject lands are on the periphery of Dundalk and their development would not follow a sequential pattern of development. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR265
Submitted By	Genesis Planning consultant on behalf of Ruth Connelly
Theme (s):	Rezone Dundalk

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to an 8.75ha site along the Red Barns Road, Dundalk. The site is zoned as 'Open Space H1' in the Draft Louth CDP 2021-2027, it is requested that:

- That the Planning Authority include lands already developed under planning as 'A1 Existing Residential' in the forthcoming Louth CDP 2021-2027
- That the Planning Authority include the residual lands identified as 'A2 New Residential' in the forthcoming Louth CDP 2021-2027.

- In terms of housing policies that a further objective be included in the development plan that covers scenarios such as our client's lands (i.e. an agricultural holding) so that one-off dwellings are permitted, either in the form of serviced sites or as standalone dwellings.
- That the spot objective under Table 13.2 be amended so that the 'blanket zoning' of our client's lands, and indeed to entirety of the area which Spot Objective No.2 relates to is removed.
We request this spot objective does not apply going forward given our client's existing dwelling, agricultural lands and appropriateness of the subject lands for development purposes.
- In terms of land use zoning objectives, we submit the 'blanket zoning' of our client's lands as 'Open Space H1' is entirely inappropriate, given the established agricultural and residential use of the lands. It should be amended so that it either does not include the subject lands or the objectives/generally permitted uses/open for consideration be amended to include for (i) agricultural developments and (ii) residential developments.

In Support:

Planning History

Planning history for the site and surrounding area is provided, of particular relevance is 19/413 which was granted permission for refurbishment of Rose cottage and 81 new residential properties, the application is currently under appeal. Application 19/413 is located on lands opposite subject site and on lands which are subject to a 0.5% Tidal AEP event (1 in 200-year flood event). The subject lands are at a higher topographical level, and only partly designed as being at risk of a 0.1% tidal AEP event.

As per 'The Planning System and Flood Risk Management Guidelines', the existing ground levels are largely already above the 1 in 200 coastal flood level, and a site layout can readily be achieved so that the minimum floor level is above the 1 in 200 coastal flood level. This is consistent with the planning rationale incorporated into application 19/413, and the Planning Authority should not 'blanket zone' lands which are only 'marginally' at risk of 1:1000 AEP tidal flood events.

Zoning

The 'blanket zoning' of our client's lands as 'Open Space H1' is entirely inappropriate, given the established agricultural and residential use of the lands. The extent of Open Space H1 is inappropriate, given no open space is existing or proposed for this location.

Housing Context and Policy

Support for HOU 15 and HOU32 and request that these objectives are maintained going forward.

Request that a further policy objective be included that covers scenarios such as our client's lands (i.e. an agricultural holding) so that one-off dwellings are permitted, either in the form of serviced sites or as stand-alone dwellings. This would be consistent with NPF Objective 3a.

National Regional and Local Planning Policy

A detailed analysis of national planning policy is provided. It is stated that the subject lands should be prioritised for development they are serviced/ serviceable and contiguous with existing developed lands, their development would be compliant with Appendix 3 and Objectives 3, 3a, 5, 7, 72a, 72b of the NPF. A detailed analysis regional planning policy is also provided. The site is located along the Dublin to Belfast economic corridor close to the border with Northern Ireland, the site is located on the sequentially periphery of the town core its development would be consistent with the RSES in particular RPO's 4.78 and 4.83. In the current Louth CDP 2015-2021 Dundalk is a level 1 settlement, the site is included within the settlement boundary of Dundalk and are known as 'white lands' Details regarding the Housing Strategy are provided, Policy Objectives RES 2 and RES 6 are cited.

An analysis of population growth of the State, the Greater Dublin area, Co Louth and the Dundalk and Environs and Dundalk's housing market was undertaken. The evaluation concluded that there is a shortage of residential units and development of the subject lands for residential purposes should be supported.

In terms of sequential development the submission claims the site is appropriate, given that:

- The lands are serviced;
- The lands directly accessible from the existing road infrastructure;
- The lands are within walking distance of local amenities;
- The lands are within walking distance (350m) of the bus route which passes along lower Avenue Road;
- The lands are sequentially the next available parcel of lands for residential development;
- The lands are within the settlement boundary of Dundalk and directly adjacent to an existing dwelling;
- There are existing developments which are located further removed from the urban core, making the subject lands infill development and appropriate in sequential terms.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Strategic Recreation' in the 2009-2015 Dundalk Plan. The OPW CFRAMS Flood Maps in the Draft Development Plan indicate that the subject lands are located in Flood Zone B. A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan. Residential Development is classed as a 'Highly Vulnerable development' in 'The Planning System and Flood Risk Management Guidelines' and would not be considered a suitable land use on undeveloped lands located in Flood Zone B, particularly when there are lands with a lower risk of flooding available for development in the town.

With regards to File ref. No. 19/413, this decision to grant permission was overturned by An Bord Pleanála for reasons pertaining to flood risk.

The OPR references in Recommendation 8 of their submission the need to avoid the exacerbation of existing urban sprawl having regard to the national objective for compact growth. The proposal for random one offs runs counter to this.

It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No: LCDP DR268

Submitted By

The Planning Partnership on behalf of Andrews Construction Ltd.

Theme (s):

Dundalk

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to a 2.71ha site at Old Golf Links Road, Blackrock, Dundalk. In the Draft Louth CDP 2021-2027 the subject lands are designated a Residential Existing (A1) and Mixed Use (C1)

The submission states:

- A1 Existing Residential zoning objective on part of the subject lands is welcomed.
- The C1 Mixed Use designation does not necessarily exclude 'residential development' however it needs to be considered in the wider context of extant permissions related to 'residential care' proposals permitted to the north.
- Andrews Construction Ltd. wish to seek assurances that the C1 Zoning does not prejudice their ability to deliver a wholly residential proposal in the next plan period.

- A significant portion of land provided for 'C1 Mixed Use' and as extends further north of the subject site is considered excessive having regard to the planning history of the site (12/493 and 18/784 pertaining to a nursing home).
- Lafferty Architects sketch / feasibility proposals for a potential, deliverable scheme are provided, it stated that the scheme has regard to national and regional planning policy, an application for residential development on the site is advancing to planning.
- Development of the subject lands for residential use constitute infill development and represent compact growth
- Change from Mixed Use to Residential will align more accurately with the settlement pattern of the environs and enhance sustainable transportation.

Chief Executive's Response:

The site layout of the nursing home as granted to the north of the subject lands is noted. As the submission indicates, the Mixed Use Zoning does not preclude residential development.

As part of the preparation of the Local Area Plan for Dundalk a more detailed examination will take place of the Mixed Use lands in this location as part of the review of land use zonings where a more informed decision can be made as to whether or not the Mixed Use Zoning is required on the subject lands.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR326

Submitted By

EHP Services and P Herr on behalf of Dundalk Golf Club Development Committee

Theme (s):

Rezoning

Map showing lands subject to Submission:



Summary of Submission:

In the Draft Louth CDP 2021-2027 the lands are zoned as Open Space (H1) it is requested that the lands are rezoned to Mixed Use (C1)

In support:

- The subject sites are surplus to the current and future requirements of the Golf Club.
- Sites have never formed part of golf club and are physically separate.
- Sites and adjoining fields are currently zoned employment and business, in the Finnabair South Character Area indicative layout indicates a mixed use commercial and residential area.
- Rezoning of lands will bring them in line with adjoining land block and allow a freer hand at master planning.
- The re-zoning will have no material impact upon the Plan's policies, objectives or vision.
- Policy Objective CS 10 is noted, it is important that the zoning maps for Dundalk align with the future LAP.

Chief Executive's Response:

The subject lands are located within Area 5 'Finnabair South' of the Mullaharlin Framework Plan.

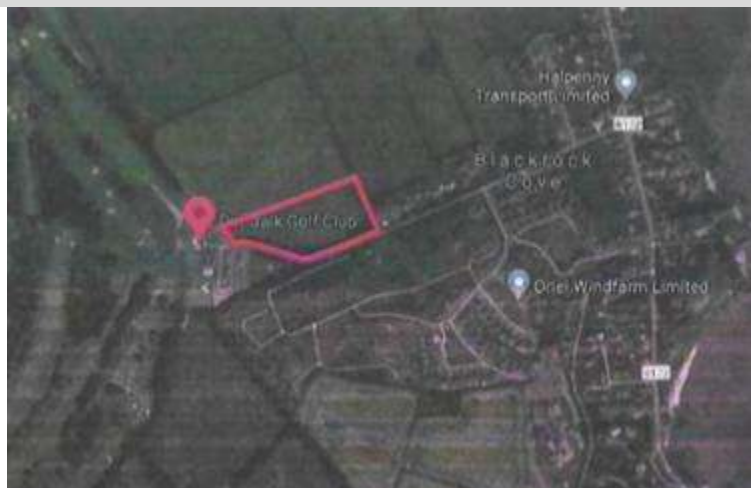
The proposed 'Open Space' Zoning on the lands has been carried forward from the 2009-2015 Dundalk Development Plan.

It is acknowledged that the lands are physically separated from Dundalk Golf Club by an existing boundary of trees/hedgerow. It is agreed that it would be more logical to extend the 'Mixed Use' zoning to include the subject lands and if there is a requirement to provide open space this can form part of any Master Plan or planning application on the subject lands. This approach would result in a more integrated development of the lands in Finnabair South and would provide a greater degree of flexibility in the design of any development, thus assisting in the creation of a quality layout and living/working environment.

Chief Executive's Recommendation:

Amend the zoning of the subject lands from 'H1 Open Space' to 'C1 Mixed Use'.

Submission No:	LCDP DR327
Submitted By	EHP Services and P Herr on behalf of Dundalk Golf Club Development Committee
Theme (s):	Rezoning
Map showing lands subject to Submission:	



Summary of Submission:

In the Draft Louth CDP 2021-2027 the lands are zoned as 'Open Space (H1)' it is requested that the lands are rezoned to 'Community Facilities G1'.

In support of the application it is stated that:

- The subject site is surplus to the current and future requirements of the Golf Club.
- The site is surrounded by residential development.
- A table is provided showing the total potential population projection that could be accommodated in the surrounding zoned but undeveloped lands, c. 6625 persons.
- The provision of a centrally located and readily accessible community/ civic use would improve integration and connectivity.
- The two neighbouring SHD's provide crèche facilities however they are limited and may never be constructed.
- If the site was re-zoned to 'Community Facilities' it could provide medical centre/social facilities/open space and recreation.
- The site would be served by alternative forms of transport, improve participation in recreation activities as well as assisting with community interaction and cohesion.
- The re-zoning will have no material impact upon the Plan's policies, objectives or vision.
- Policy Objective CS 10 is noted, it is important that the zoning maps for Dundalk align with the future LAP.

Chief Executive's Response:

Whilst it is acknowledged that these open space lands are currently under-utilised as part of the golf course, and the provision of additional lands for community facilities is generally welcomed, further analysis of the suitability of these lands for community uses would have to be carried out, particularly with regards to access, connectivity, and permeability with the surrounding residential areas in addition to the relationship with the centre of Blackrock.

This analysis will be carried out as part of the preparation of the Local Area Plan for Dundalk. It is recommended that the proposed open space zoning is retained and this issue is re-examined as part of the Local Area Plan for Dundalk.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR329

Submitted By

Martin Hegarty and Len Mullins on behalf of Declan Curran, Brendan Mc Cann, Philip Carter, Brendan Duffy, Brendan Begley and Thomas Byrne.

Theme (s):

Rezoning Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Rezone from Strategic Reserve (L1) to Residential

In Support:

- The proposed Strategic Reserve will de- zone our sites and remove the asset from its current status.
- Lands have been zoned for residential development for many years and are destined for development by dependents as their housing needs arise.
- The residential development zoning was a practical approach to development upon provision of water, sewage and roads infrastructure
- The previous residential zoning was welcomed.
- Planning permissions were not secured in recent years due to personal circumstances; however applications for dependants are due to be submitted early 2021.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The lands are removed from the established built up area of Dundalk and the development of these lands would not result in a sequential pattern of development.

The Infrastructure Assessment identified that there is limited capacity in water services infrastructure and potential solutions to constraints will be identified as part of the Drainage Area Plan currently being prepared. Upgrades to the roads infrastructure would be required to facilitate the development of the subject lands and wider area.

Taking this into account, in addition to the fact that there is an excess of residential lands in Dundalk, the lands were placed in a Strategic Reserve.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. The subject lands are on the periphery of Dundalk and their development would not follow a sequential pattern of development. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:**LCDP DR331**

Submitted By

Fred O'Hagan

Theme (s):

Rezone Dundalk

Map showing lands subject to Submission:**Summary of Submission:**

In the Draft Louth CDP 2021-2027 the lands are zoned New Residential (A2) and General Employment (E1) see map above. It is requested that the whole site is zoned as New Residential (A2).

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are zoned 'Employment Mixed Use' in the Dundalk Development Plan 2009-2015.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out.

This assessment is based on a range of criteria including infrastructure availability / constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The subject lands are zoned 'General Employment', which aligns with the zoning of the adjacent lands to the west.

There is no requirement for any additional residential lands in Dundalk.

Further there is a section of the subject lands that are identified as being within Flood Zone B. As per the Flood Risk Guidelines for Planning Authorities, a justification test has been carried out for the subject lands. This is set out in the updated Strategic Flood Risk Assessment in Appendix 7 of this Report.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. The proposed 'General Employment' of the subject lands is aligned with the zoning of the adjacent lands to the west, which are also zoned 'General Employment'. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR335
Submitted By	Virtus on behalf of Bill Baldwin, John and Patrick McParland.
Theme (s):	Rezone Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Request rezoning of lands from Strategic Reserve (L1) to Residential New (A2). Lands zoned Open Space (H1) should remain as such.

Include an extension of the new Link Road from the R178 Carrickmacross Road to the R174 Old Ardee Road through the subject lands and extending south through the Business and Technology lands to connect to the existing roundabout on the N52. Table 7.4 of the draft County Development Plan and associated maps to be amended.

Require that the extended link road be delivered as part of the first phase of the development of the subject lands, in so far as contained within the subject lands

Include specific objectives for the site:

- 25% public open space to include linear park.
- Reservation for a new railway station.
- Upgrades to the R171 to include improved footpath and cycle way connections to the Crescent in Dundalk town centre.
- Delivery of education and community infrastructure to support sustainable community at this location.
- To require an additional 10% social and / or affordable be delivered on the site, in addition to the 10% social housing as required under Part V of the Planning and Development Act 2000, as amended.

Louth should re-examine the weighting system in the land use evaluation which gives equal weight to Dundalk and Blackrock Town Centre, focus should be on Dundalk.

In Support:

Submission is accompanied by concept Masterplan prepared by Henry J Lyon Architect. There are a number of planning benefits to developing the site; sustainable community of c,1330 persons, catalyst for new link road from R178 Carrickmacross to R171 Ardee, 1st phase of new link road through site, provision of 10% social housing would equate to 130 units, catalyst for new railway station to the south of Dundalk, delivery of a linear park(at 25% this would equate to 12.5ha), upgrade of R171 including footpath and cycle ways, provision of neighbourhood facilities and education/childcare facilities.

Infrastructural Assessment and Land Use Evaluation

The subject lands are included within broader parcel of land 'Site 11', thus distorting the potential of eastern part of site. Furthermore, the assessment appears to give equal weight to Blackrock and Dundalk town centres, this is not considered to be an appropriate approach. Additionally, no description of the methodology is provided and it is unclear why some sites have not been included (4no sites in Dundalk are listed).

When examined against the criteria in the Development Plan Guidelines lands score favourably in terms of proximity to town centre, requirement for additional residential zoning, delivery of strategic infrastructure (it is one of 16no. Tier 2 sites), provision of a planned coordinated neighbourhood, furthermore existing services are available and only a small section is prone to flooding.

Existing national monuments/ trees / hedgerows can suitably be integrated and would have significant benefits, this would be in accordance with SC15 of the draft Louth County Development Plan.

Infrastructure

Excerpt from the Infrastructural Assessment and Land Use Evaluation in relation to Site 11 is provided. It is stated that the proposed development could deliver and contribute to the cost of the remainder of upgrade work required to the R171.

Land Use

The extensive nature of Site 11 results in the subject lands scoring more poorly than they should have in relation to the town centre, comparison is drawn to Site 15 which is located further away from Dundalk town centre yet has a better score due to its proximity to Blackrock. Weighting system should be re-examined.

Suitability of Subject Lands for Development

In terms of suitability of the site for development Section 6.6 of the NPF and Sections 4.11 and 4.12 of the Development Plan Guidelines are cited. An evaluation of the site has been undertaken in terms of the Development.

Need

Projected population figures are provided in terms of the NPF's Implementation Roadmap. Section 2.5.4 of the draft Louth CDP 2021-2027 directs population and household growth to the RGC's of Dundalk and Drogheda. It is stated that the Core Strategy clearly demonstrated the requirement for additional residential zoning.

Policy Context

There is clearly a need for residential land to be zoned. In terms of the location of zoned lands it is stated the submission site has the potential to deliver strategic infrastructure, the infrastructure assessment is not considered accurate and its re-evaluation will determine that the subject lands are suitable for development.

Capacity of Water Drainage and Roads Infrastructure

The lands fall within Site 11 and it is one of 16 no Tier two sites it therefore scores as strongly as another other site in Dundalk in terms of Infrastructure.

Supporting Infrastructure and Facilities

The delivery of infrastructure as described elsewhere in this submission would be directly triggered by the development of these lands.

Physical Suitability

Site is relatively flat, adjoins an artery into the town. The road contains the necessary services. It is not prone to flooding and trees and hedgerows can be incorporated into the development.

Sequential Approach

Dundalk town centre is 2km from the site, c. 20min walk or a 5min cycle. There are 2 key public transport links in proximity to the subject lands, bus stop and rail station. Range of old retail centres and service establishments 1.5/2 km of the site.

Proximity to the town centre has been addressed in infrastructural assessment(as per above)

Environmental and Heritage Policy, including Conservation of Habitats and Other Sensitive Areas

Two national monuments on lands, they can be retained protected and incorporated in a sustainable manor.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The lands are removed from the established built up area of Dundalk and the development of these lands would not result in a sequential pattern of development.

The Infrastructure Assessment identified that significant investment in transport and water services infrastructure is required to facilitate the development of the lands and the wider area.

Taking this into account, in addition to the fact that there is an excess of residential lands in Dundalk, the lands were placed in a Strategic Reserve.

With regards to the proposal to provide a link road through the lands, it is not considered that there is a requirement for this road.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy.

The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. Significant investment in transport and water services infrastructure is required to facilitate the release of the lands for development. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR338

Submitted By

J Campbell

Theme (s):

Rezone - Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Request to remove open space designation

Chief Executive's Response:

The subject lands should not be viewed in isolation but rather as part of the wider Mount Avenue Master Plan area. This open space is intended to form part of the open space in the development of the Master Plan lands.

It is acknowledged however that a revised Master Plan is currently under preparation and the final layout of a development may result in an amendment to the location of the open space due to archaeological and connectivity considerations. It would be critical however that any amendment to the location of the open space would not result in a reduction in open space area or its quality.

This is an issue that can be examined in greater detail as part of the Local Area Plan for Dundalk. It is recommended that the location of the open space is retained as proposed.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR344
Submitted By:	Robert Kenny on behalf of Dermot Breen
Theme (s):	Rezoning Dundalk - Amend Policy and Text
Map showing lands subject to Submission:	



Summary of Submission:

Request that lands at Haynestown Dundalk are rezoned from Open Space (H1) to General Employment (E1).

The amount of open space is excessive, the boundary between proposed open space and employment generation uses appears arbitrary, the boundary should be removed to reflect the surrounding zoning.

The amount of land left for employment generation is insufficient to develop the site, the rezoning of part of the open space lands would provide c. 5ha of employment generating land thereby resulting in a viable option.

Access would be via a new road from a local distributor road, which has already been constructed. The area zoned for employment generation needs access to this road.

Lands currently zoned for open space pertain to 4.2ha, the proposed re-zoning would reduce this to 2ha. This is still 15% of the total land holding and would provide sufficient space should the adjoining GFC wish to expand.

Chief Executive's Response:

The subject lands that are identified as open space should not be viewed in isolation but rather in the context of the development of the lands in the immediate area. Whilst it may be a significant period of time before the development of this area is realized, it is important to retain this area of open space taking account of its relationship with the overall land-use zoning objectives in the immediate area.

The draft County Development Plan is seeking to encourage the delivery of open space areas that provide qualitative passive and active open space areas to existing and future residents along with a network of corridors between these open space areas to encourage more sustainable movements between the different zonings such as walking or cycling. These green spaces and associated corridors will also act as ecological corridors and promote increased bio-diversity in our urban areas as well as providing enhanced opportunities for SUDS. The latter point is particularly pertinent in Dundalk in general given the extent of Flood Zone A and B lands that exist.

As part of the preparation of the Local Area Plan for Dundalk such issues will be examined in greater detail. It is recommended that the location of the open space is retained as proposed.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR345
Submitted By:	P Herr and Associates
Theme (s):	Rezoning Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Request that the subject site is rezoned from Strategic Reserve (L1) to General Employment (E1).

Key Points

- Dundalk is a Regional Growth Centre as per the NPF and strategically located along the Dublin- Belfast Economic Corridor.
- The lands adjacent to the Brewery Business Estate are contiguous with the urban fabric of Dundalk, they provide a logical extension of same and would contribute to compact growth. Development of these lands for high quality employment floorspace will support the strategic objective of the RSES

- Lands were earmarked for future development in previous Plans

Suitability of Lands for Employment

- Adjacent to Dundalk's urban area located close to public transport, road networks and the town centre.
- Would result in a clustered development (Contiguous to existing business park and adjacent to Business and Technology lands to the south) as promoted by Policy Objective EE20
- Will result in infrastructural improvements;
 - i. Delivery of first phase of the strategic road link from R78 Carrickmacross to R171 Ardee Road to link in with N2 and subsequently facilitating the opening up of land for future development,
 - ii. Contribute to the delivery of a new railway station (MOV 14 of the Draft Louth CDP 2021-2027),
 - iii. Provide for a linear park in accordance with SC15 of the draft Plan; and
 - iv. Upgrade of the R171.
- Economic development should be directed to Dundalk as per EE37
- The RSES identify Dundalk as a Regional Growth Centre and driver for economic development of the Region.

Review of the Draft Louth County Development Plan 2021-2027

Lands are identified as Strategic Reserve in Draft Louth CDP 2021-2027 and are within 'Site 11' of the Dundalk Assessment. Concerns are raised regarding this assessment, namely:

- Not all zoned undeveloped lands have been included.
- Site 11 (in which the subject lands are located), should have been split into smaller sites and lands adjoining Dundalk's built form assessed independently. Lands to the NE of Site 11 score poorly in terms of proximity to the town centre yet are located only 2km from same.
- The weighting system gives equal weight to Dundalk and Blackrock town centres.

The Following is Highlighted

- Lands are serviceable and available for development in the short to medium term
- National monuments on lands can be retained, protected and incorporated
- Existing trees and features will be retained

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out.

This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The lands are removed from the established built up area of Dundalk and the development of these lands would not result in a sequential pattern of development.

The Infrastructure Assessment identified that there is limited capacity in water services infrastructure and potential solutions to constraints will be identified as part of the Drainage Area Plan currently being prepared. Upgrades to the roads infrastructure would be required to facilitate the development of the subject lands and wider area.

Taking this into account, in addition to the fact that there is an excess of residential lands in Dundalk, the lands were placed in a Strategic Reserve.

It is acknowledged, however that the southern boundary of the subjects lands abut the lands zoned for 'Business and Technology' uses. This Business and Technology zoning is an important zoning in Dundalk realising its economic and employment potential and fulfilling its potential as a Regional Growth Centre. In this regard there is merit in considering the extension of the Business and Technology land use zoning in order to ensure there are continued opportunities to facilitate the creation of high-value employment opportunities in the town and ensure the continued implementation of a plan led approach and a medium-long term development framework for the area.

The development of these lands will be the subject of the preparation of a Master Plan which shall set out the details regarding design and layout of the business, enterprise, or employment related development on the Master Plan area, any mitigating measures to address any environmental or land use constraints associated with the lands, access and service arrangements, the phasing of the build out of the lands, and how the amenities of local residents in the immediate vicinity of the lands will be protected.

In conclusion, strengthening the economic and employment base of the Regional Growth Centre of Dundalk is a strategic objective of the Development Plan. The Mullagharlin area of the town has had notable success in attracting high-value employers to the town. It is important to continue to build on this in order to support the economic growth of the town in the long term. It is therefore proposed to identify an additional c.40 hectares of land as 'E2 Business and Technology'.

Chief Executive's Recommendation:

Amend the land use zoning of the c.40 hectares of land on the map below from L1 'Strategic Reserve' and H1 'Open Space' to E2 'Business and Technology'.



Include a Spot Objective on these lands indicating a Master Plan is required in Table 13.2 as follows:

Spot Objective Number	Location	Objective
3	Dundalk	To require the preparation of a Master Plan. See Master Plan 7 in Table 13.1 for further details.

Insert the following into Table 13.1

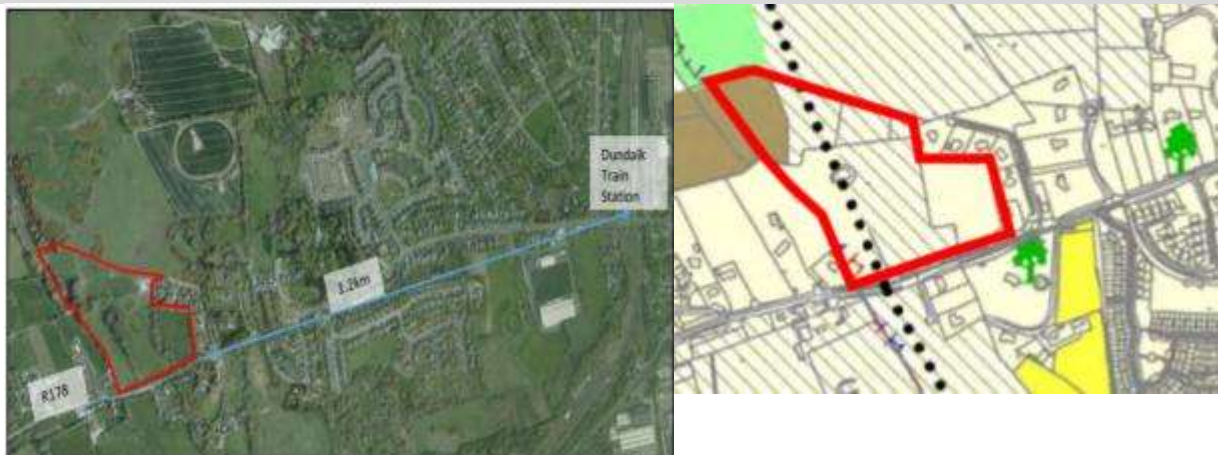
Master Plan Number	Settlement	General Description	Status
7	Dundalk	These lands form an extension to the Mullagharlin Framework Plan and will provide opportunities for continued economic investment and employment generating development in Dundalk. The development of these lands shall be closely aligned to the design and layout of the adjacent lands to the south as agreed under the Mullagharlin Framework Plan, particularly with regard to access, and construction and delivery of services, and also delivering a high level of connectivity and permeability between the lands. The proposed Master Plan shall include details of the design and layout of any buildings, how any potential environmental or land use constraints will be addressed, how the amenities of local properties and services will be preserved, and the proposed phasing for the build out of the lands.	Pending

Particular consideration shall be given to the potential impacts of any development of the lands on Killally Graveyard and the access to same, with appropriate landscaping and buffer zones integrated into any layout to protect their character and setting. The Master Plan shall also examine opportunities for and the feasibility of the restoration of the former quarry, together with any future intended uses of the former quarry.

Submission No: LCDP DR360

Submitted By Stephen Ward on behalf of Tapemount Limited
Theme (s): Rezoning

Map showing lands subject to Submission:



Summary of Submission:

Submission relates to a parcel of (land 7.55ha) at the Carrick Road, Dundalk. The submission lands are zoned as 'Existing Residential (A1), Strategic Reserve (L1) and Community Facilities (G1), the black line depicts a future link road.

The submission requests:

- The rezoning of lands to New Residential (A2).
The Submission is accompanied by a Report from Waterman Moylan Consulting Engineers.

In support of the rezoning:

Zoning of the Mount Avenue Masterplan Lands

- As per the Draft Louth CDP 2021-2027 the Mount Avenue area will be one of the primary locations for residential growth and part of the lands will be released by the construction of the LIHAF funded Mount Avenue Link Road.
- The submission states that the 38ha identified in the Mount Avenue master plan will not be sufficient to deliver 1,200 residential units having regard to the land take associated with the link road and the 12ha of land zoned as Open Space (H1). Additional residential lands are required.

- Furthermore insufficient lands have been identified in the Mount Avenue Area, this would not make best use of the LIHAF road and would be contrary to Pillar 3 of Rebuilding Ireland.

Evaluation of Submission Lands in the Draft Louth CDP 2021-2027

- The subject lands fall under assessment of 'Site 10 ' (100ha) in the Infrastructure Assessment and Land Use Evaluation contained in Appendix 2 of the draft Louth CDP 2021-2027;
- No account has been taken of land ownership;
- The traffic light system identifies the site as Tier 2 'services are not available or further investment in infrastructure is required and this investment is likely to be provided during the lifetime of the Plan'. Broad brush approach is not acceptable, no regard is had varying characteristics from topography, availability of infrastructure and specific environmental considerations
- Submission lands may not be infill/ brownfield, however given that Dundalk is a Regional Growth Centre, they should not have scored so poorly.
- Map submitted showing location of shops, schools, amenities and Dundalk train station.

Strategic Reserve lands are Contrary to Regional Planning Policy

- There has been no ranking or prioritising of residentially zoned lands in Dundalk. Lands are zoned 'A1 New Residential' or 'L1 Strategic Reserve', the latter effectively 'dezones land.
- Furthermore, when preparing the Local Area Plan for Dundalk, its distribution of population is predetermined.
- In the absence of national guidance a very high level of flexibility needs to be provided in terms of housing provision especially for Dundalk, a Regional Growth Centre

Mount Avenue Growth Centre

The RSES, adopted in 2019, took account of the Mount Avenue Masterplan, as adopted in 2007 and therefore the subject lands should be reinstated to allow for the growth of Dundalk as envisaged by the RSES

Settlement Hierarchy

- Drogheda and Dundalk are Regional Growth Centres. Dundalk is to be allocated the larger share of projected growth during the Plan period (36.3%).
- However, the treatment of Dundalk in terms of the availability of residentially zoned lands differs entirely from Drogheda. The Strategic Reserve zoning does not apply to any lands in the Drogheda area, all lands zoned residential are retained.
- The application of the L1-Strategic Reserve zoning is not in keeping with the plan-monitor-manage system, which allows for the adjustments as envisaged by the Draft Louth CDP 2021-2027 and the RSES's.

De-zoning of Residential Lands in Dundalk

- The RSES emphasises that development land prioritisation measures are more appropriate than 'de-zoning' where there may be a surplus (p.50). Strategic Reserve zoning objective is inappropriate for Dundalk.
- There has been no 'tiered approach' or prioritisation applied to lands and no option provided should lands identified not come forward for development.
- RSES's highlight that if sites are not brought forward for development alternative lands should be released.
- There is no assessment as to the availability of the lands to the West of Dundalk coming forward during the lifetime of the Plan.
- The submission lands can be easily accessed and serviced within the lifetime of the Plan.
- MOV 44 of the Louth CDP 2021-2025 supports the progression of identified link roads Dundalk. These roads cannot be constructed without the development to support them.
- Policy Objective MOV 39 that supports the provision of a link road from the R934 Castleblaney Road to R178 Carrickmacross Road and will release lands within the Mount Avenue Masterplan Area.
- The implementation of this road objective will be led by construction.

Tiered Approach

- As per NPO 72a, a Tiered Approach to identifying lands available for development has been utilised in the draft Louth CDP 2021-2027.
- It is submitted that the NPF does not require the de-zoning of lands that qualify as Tier 1 or Tier 2. It is only where land has been identified by the infrastructural assessment of the planning authority that cannot be serviced during the life of a Development Plan or Area Plan that it should not be zoned for development as specified by NPO 72c.
- Infrastructure Assessment and Land Evaluation contained at Appendix 2 of the Draft Louth CDP 2021-2027, there are only two sites (Nos. 3 and 7) in Dundalk that are identified by a red colour (services are unavailable and unlikely to be provided during the lifetime of the Plan). Site number 3 has been zoned for 'E1- General Employment' and site number 7 has been zoned 'L1 Strategic Reserve', thus site number 3 has been zoned in the Draft Plan. Furthermore site number 4 has a higher / less favourable score, is zoned for residential development yet sites within a more favourable score are allocated as Strategic Reserve (sites 5, 6, 10, 11 and 12).
- If an assessment regarding the availability of land was undertaken a realistic trajectory of anticipated development could be provided, this would be in accordance with HOU 6 and 7 of the Draft Louth CDP 2021-2027.
- In accordance with National Policy, lands identified as Tier 2, including the submission lands, can be zoned for development within the lifetime of the Development Plan. Residential development in Dundalk could be monitored to ensure compliance with the population allocations defined by the Core Strategy, and to adjust the approach to permitting development proposals in instances where Core Strategy objectives are not being met.

Housing Need Demand Assessment (HNDA)

HPO 37 of the NPF requires the provision of a (HNDA). The HNDA is only the first step and source of evidence to inform plan-making and decision-taking, and the identification of a 6-year supply of housing land. An assessment of lands should have regard to inter alia the likelihood of development coming forward.

A site should only be considered available for development to meet the identified need when, on the best information available (confirmed by information from landowners and legal searches where appropriate) and where there is confidence that there are no legal or ownership impediments to development.

The Strategic Reserve land use zoning applied to the submission lands and other lands in Dundalk is unfounded and in direct conflict with the evidenced based approach of the NPF and RSES, which places greater emphasis on actual delivery of housing.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 1', 'Residential 2' and Community in the 2009-2015 Dundalk Plan. The 'Residential 2' lands are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The Council would strongly dispute the claims put forward in the submission that the ranking of sites in the Land Use Evaluation were pre-determined.

Whilst the subject lands consist of just a small area of Site 10 in the Infrastructure Assessment they are an integral part of these lands as they provide the access for these lands on to the Carrickmacross Road.

The Infrastructure Assessment identified transport and water services constraints on these lands and the wider lands within site 10 of the assessment.

Population Targets

The Chief Executive is fully aware of the fact that the population target of 50,000 for Drogheda and Dundalk by 2031 is not a cap. However there is also a requirement to prepare development plans in accordance with national and regional policy, and in this regard the CE has been provided with figures for population and housing to meet the growth trajectory for the County set out in the National Planning Framework.

The CE would not agree with the assertion made in the submission that the growth of Dundalk is being constrained by placing lands in a strategic reserve. The zoning of excess lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy.

It is envisaged that a more active land management approach will be taken over the life time of the plan to ensure the delivery of housing units in a timely manner and to avoid a scenario of core strategy figures being depleted through inactive extant permissions.

The submission refers to the population projections being lower than that in preceding years. This is not the case. Between 2006-16 the population of the County increased by 17,617 persons, whilst the projected population increase between 2016-2027 is 21,082 persons. This is set out in Table 2.8 of the Draft Plan.

The CE would not agree with the statement that the population and housing allocations for Dundalk show a lack of ambition. What is important when preparing a development plan is to ensure they are evidence based. Whilst the CE would welcome the successful growth of both Regional Growth Centres in delivering economic, population, and residential growth any growth projections must be factually based and realistic. In addition consideration must be given to the fact that international migration is a key driver for population growth. This is particularly relevant in the context of the potential impacts of Covid-19 on population growth due to restrictions on travel which may have longer term impacts on immigration levels. Taking all these factors into account the Council is satisfied the population projections for the Regional Growth Centres are achievable, ambitious, and in accordance with national and regional policy.

Infill and Brownfield Lands

The submission indicates that infill and brownfield lands should not be included in the housing allocation and treated as 'windfall' sites. National policy requires 30% of housing to be delivered on infill and brownfield sites in order to achieve compact growth. Calculating the quantum of land that can be provided on such lands is therefore a critical element of the identification of total residential lands required in a settlement and the overall County.

Strategic Reserve in Drogheda

The submission raises the issue that there is a contrast in policy in Drogheda and Dundalk in that there are no lands in Drogheda identified in a Strategic Land Reserve.

Section 2.13.6 of the Draft Plan acknowledges there is an extensive quantum of residential lands in the Northern Environs of Drogheda. There are a large number of extant planning permissions on these lands most of which have commenced development, therefore it was not considered appropriate to place any of these lands in a Strategic Reserve having regard to the phasing arrangements already in place. This issue will be addressed in greater detail as part of the Joint Local Area Plan for Drogheda.

Core Strategy Table

Queries were raised with regard to the figures in the Core Strategy Table relating to infill and brownfield land and the total lands available for development in each settlement. In this regard the Forward Planning Team reviewed the potential lands within each settlement that could deliver infill and brownfield development. In identifying Greenfield residential lands cognisance was given to the fact that there may be long term challenges in the development of some infill and brownfield lands.

With regard to greenfield lands in accordance with the RSES there was not an overdependence on strategic lands with long term development potential over lands more likely to deliver development in the short term. This was carried out in the context of the projected housing demand as set out in the Core Strategy.

Housing Strategy

Queries were raised with regard to the figures for projected households in Table 4.3 and Table 2.14. Section 2.6.5 in Chapter 2 'Core and Settlement Strategy clearly sets out how the projected housing allocation was calculated.

Conclusion

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. Further, National Policy Objective 72c sets out that when considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy and would give an unrealistic expectation that these lands could be developed within the next six years. The population and housing projection for Dundalk is consistent with national and regional policy and the quantum of residential lands identified will meet the projected housing demand during the life of the Plan. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR361
Submitted By	Stephen Ward on behalf of Yack Unlimited
Theme (s):	Rezoning Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Submission relates to a parcel of land (22ha) at the Ardee Road Dundalk. The submission lands are zoned as Open Space (H1), Community Facilities (G1) and Strategic Reserve (L1).

The submission requests:

- The rezoning of lands to New Residential (A2)
Submission is accompanied by a report from Waterman Moylan Consulting Engineers

In Support

Strategic Reserve Lands Conflict with Achievement of Plan Objectives

- Policy Objective MOV 39 of the draft Louth CDP supports road and bridge improvements set out in Tables 7.3 and 7.4. MOV 44 pertains to progression of identified link roads.
The construction of the planned road infrastructure will not be viable if the land it serves are not zoned for development. The implementation of this road objective will be led by construction.
- A significant portion of the submission lands have been zoned 'G1-Community Facilities'. It is submitted that the area of proposed A2 lands and existing residential development do not provide the critical mass needed to support the provision of community facilities in this location. In the absence of a new LAP, the County Plan is pre-emptively dismissing the SWLAP by de-zoning essential all residential lands within the LAP area.
- The provision of a large public park within the submission lands has long been an objective of the Dundalk and Environs Development Plan and was also detailed in the South West Local Area Plan (2006). The submission lands could be developed to provide residential and community facilities with the benefit of a large public park.

Strategic Reserve lands are contrary to Regional Planning Policy

- There has been no ranking or prioritising of residentially zoned lands in Dundalk. Lands are zoned 'A1 New Residential' or 'L1 Strategic Reserve', the latter effectively de-zones land. There is insufficient choice which could restrict growth of Dundalk.
- Furthermore, when preparing the Local Area Plan for Dundalk, its distribution of population is pre-determined.
- In the absence of national guidance a very high level of flexibility needs to be provided in terms of housing provision especially for Dundalk, a Regional Growth Centre
- Drogheda and Dundalk are Regional Growth Centres. Dundalk is to be allocated the larger share of projected growth during the Plan period (36.3%).
- However, the treatment of Dundalk in terms of the availability of residentially zoned lands differs entirely from Drogheda. The Strategic Reserve zoning does not apply to any lands in the Drogheda area, all lands zoned residential are retained.
- The application of the L1-Strategic Reserve zoning is not in keeping with the plan-monitor-manage system which allows for adjustments as envisaged by the draft Louth CDP 2021-2027 and the RSES's

Tiered Approach

- As per NPO 72a, a tiered approach to identifying lands available for development has been utilised in the draft Louth CDP 2021-2027.
- It is submitted that the NPF does not require the de-zoning of lands that qualify as Tier 1 or Tier 2. It is only where land has been identified by the infrastructural assessment of the planning authority that cannot be serviced during the life of a development plan or area plan that it should not be zoned for development as specified by NPO 72c. The submission lands are capable of being serviced as outlined in the attached Technical Note by Waterman Moylan Consulting Engineers (Appendix A).
- Infrastructure Assessment and Land Evaluation contained at Appendix 2 of the Draft Plan, there are only two sites (Nos. 3 and 7) in Dundalk that are identified by a red colour (services are unavailable and unlikely to be provided during the lifetime of the Plan). Site number 3 has been zoned for 'E1- General Employment' and site number 7 has been zoned 'L1 Strategic Reserve', thus site 3 has been zoned in the draft Plan. All other sites qualify as Tier 1 or Tier 2 lands.
- In accordance with National Policy, lands identified as Tier 2, including the submission lands, can be zoned for development within the lifetime of the Development Plan. Residential development in Dundalk could be monitored to ensure compliance with the population allocations defined by the Core Strategy, and to adjust the approach to permitting development proposals in instances where Core Strategy objectives are not being met.

Order of Priority

- The RSES emphasises that development land prioritisation measures are more appropriate than 'de-zoning' where there may be a surplus (p.50). Strategic Reserve zoning objective is inappropriate for Dundalk.
- There has been no 'tiered approach' or prioritisation applied to lands and no option provided should lands identified not come forward for development.
- RSES's highlight that if sites are not brought forward for development alternative lands should be released.

- The predetermined assessment criteria inevitably lead to low scores for any sites outside the town centre or do not contribute to infill or backland development
- Site 4 has a higher / less favourable score is zoned for residential development yet sites within a more favourable score are allocated as Strategic Reserve (sites 5,6, 10,11 and 12).
- Submission lands fall within Site 11- this is not a site at all but a large area extending c.400ha. The area is in multiple ownerships and has varying characteristics from topography to availability of infrastructure and specific environmental considerations. The area is too wide to be considered as a tiered site assessment

Release of Alternative Lands

The draft Plan identifies the majority of A2 lands proposed to be located in the Mount Avenue area south of the Castleblaney Road. However, there has been no assessment of the availability of these lands to be developed within the Plan period. Should these lands not come forward, the application of the Strategic Reserve zoning objective precludes the opportunity for alternate lands to be released within the Plan period.

If an assessment regarding the availability of land was undertaken a realistic trajectory of anticipated development could be provided, this would be in accordance with HOU 6 and 7 of the draft Louth CDP 2021-2027.

Housing Need Demand Assessment (HNDA)

HPO 37 of the NPF requires the provision of a (HNDA). The HNDA is only the first step and source of evidence to inform plan-making and decision-taking, and the identification of a 6-year supply of housing land. An assessment of lands inter alia should have regard to the likelihood of development coming forward.

A site should only be considered available for development to meet the identified need when, on the best information available (confirmed by information from landowners and legal searches where appropriate) and where there is confidence that there are no legal or ownership impediments to development.

The Strategic Reserve land use zoning applied to the submission lands and other lands in Dundalk is unfounded and in direct conflict with the evidenced based approach of the National Planning Framework and Regional Spatial and Economic Strategy which places greater emphasis on actual delivery of housing.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2', Civic and Community Centre, Community, Education and Recreation, and Recreation, Amenity, and Open Space in the 2009-2015 Dundalk Plan. The 'Residential 2' lands are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The Council would strongly dispute the claims put forward in the submission that the ranking of sites in the Land Use Evaluation were pre-determined.

The Infrastructure Assessment identified transport and water services constraints on these lands and the wider lands within site 10 of the assessment.

The OPW CFRAMS Flood Maps in the Draft Development Plan indicate that a significant portion of subject lands are located in Flood Zones A and B. A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan. Residential Development is classed as a 'Highly Vulnerable development' in 'The Planning System and Flood Risk Management Guidelines' and would not be considered a suitable land use on undeveloped lands located in Flood Zone A or B, particularly when there are lands with a lower risk of flooding available for development in the town.

Population Targets

The Chief Executive is fully aware of the fact that the population target of 50,000 for Drogheda and Dundalk by 2031 is not a cap. However there is also a requirement to prepare development plans in accordance with national and regional policy, and in this regard the CE has been provided with figures for population and housing to meet the growth trajectory for the County set out in the National Planning Framework.

The CE would not agree with the assertion made in the submission that the growth of Dundalk is being constrained by placing lands in a strategic reserve. The zoning of excess lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy.

It is envisaged that a more active land management approach will be taken over the life time of the plan to ensure the delivery of housing units in a timely manner and to avoid a scenario of core strategy figures being depleted through inactive extant permissions.

The submission refers to the population projections being lower than that in preceding years. This is not the case. Between 2006-16 the population of the County increased by 17,617 persons, whilst the projected population increase between 2016-2027 is 21,082 persons. This is set out in Table 2.8 of the Draft Plan.

The CE would not agree with the statement that the population and housing allocations for Dundalk show a lack of ambition. What is important when preparing a development plan is to ensure they are evidence based. Whilst the CE would welcome the successful growth of both Regional Growth Centres in delivering economic, population, and residential growth any growth projections must be factually based and realistic. In addition consideration must be given to the fact that international migration is a key driver for population growth. This is particularly relevant in the context of the potential impacts of Covid-19 on population growth due to restrictions on travel which may have longer term impacts on immigration levels. Taking all these factors into account the Council is satisfied the population projections for the Regional Growth Centres are achievable, ambitious, and in accordance with national and regional policy.

Infill and Brownfield Lands

The submission indicates that infill and brownfield lands should not be included in the housing allocation and treated as 'windfall' sites. National policy requires 30% of housing to be delivered on infill and brownfield sites in order to achieve compact growth.

Calculating the quantum of land that can be provided on such lands is therefore a critical element of the identification of total residential lands required in a settlement and the overall County.

Strategic Reserve in Drogheda

The submission raises the issue that there is a contrast in policy in Drogheda and Dundalk in that there are no lands in Drogheda identified in a Strategic Land Reserve. Section 2.13.6 of the Draft Plan acknowledges there is an extensive quantum of residential lands in the Northern Environs of Drogheda. There are a large number of extant planning permissions on these lands most of which have commenced development, therefore it was not considered appropriate to place any of these lands in a Strategic Reserve having regard to the phasing arrangement already in place. This issue will be addressed in greater detail as part of the Joint Local Area Plan for Drogheda.

Core Strategy Table

Queries were raised with regard to the figures in the Core Strategy Table relating to infill and brownfield land and the total lands available for development in each settlement. In this regard the Forward Planning Team reviewed the potential lands within each settlement that could deliver infill and brownfield development. In identifying Greenfield residential lands cognisance was given to the fact that there may be long term challenges in the development of some infill and brownfield lands. With regard to greenfield lands in accordance with the RSES there was not an overdependence on strategic lands with long term development potential over lands more likely to deliver development in the short term. This was carried out in the context of the projected housing demand as set out in the Core Strategy.

Housing Strategy

Queries were raised with regard to the figures for projected households in Table 4.3 and Table 2.14. Section 2.6.5 in Chapter 2 'Core and Settlement Strategy clearly sets out how the projected housing allocation was calculated.

Conclusion

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy.

The population and housing projection for Dundalk is consistent with national and regional policy and the quantum of residential lands identified will meet the projected housing demand during the life of the Plan. Further, National Policy Objective 72c sets out that when considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development. A significant portion of the subject lands are located within Flood Zone A and B of the OPW CFRAM Flood Maps. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR378

Submitted By

Mc Williams Capital Limited (John Spain Associates)

Theme (s):

Additional Wording

Map showing lands subject to Submission:



Summary of Submission:

Request that additional wording is provided in the Louth County Development Plan 2021-2027 in relation to the Northern Environs Framework Plan.

"To prepare a Northern Environs Framework Plan for Dundalk within 1 year of the adoption of the County Development Plan, and consider as part of the process, any additional lands from the Strategic Reserve that may be required to realise national and regional objectives for economic development on the Dublin-Belfast Economic Corridor, and provide for sufficient lands with appropriate zoning objectives to realise these objectives."

In Support

- McWilliams Capital have recently obtained an Irish Water connection agreement to service the lands currently in their control at Dundalk North Business Park (DNBP) on the Armagh Road, and indeed this infrastructure would have the ability to service the wider northern environs
- Existing deficiencies in capacity and investment of such infrastructure has somewhat hindered development of the northern environs to date and has likely contributed to the focusing of development in the south of Dundalk.
- Our client welcomes reference to the Northern Environs Framework Plan and respectfully requests that the planning authority undertake to prepare this framework plan within the early stages of the lifetime of the new County Development Plan.
- This would counterbalance development which has taken place to the south of the Castletown River.

Chief Executive's Response:

Policy Objective SS 33 refers to the delivery of the Framework Plan for the Northern Environs of Dundalk. This Framework Plan will not be prepared by the Council but rather will be prepared by landowners in the Northern Environs of the town and agreed with the Council.

The Local Area Plan for Dundalk will be provide further detail on the growth strategy for the Northern Part of the town, which will provide a policy platform for the preparation of the Framework Plan.

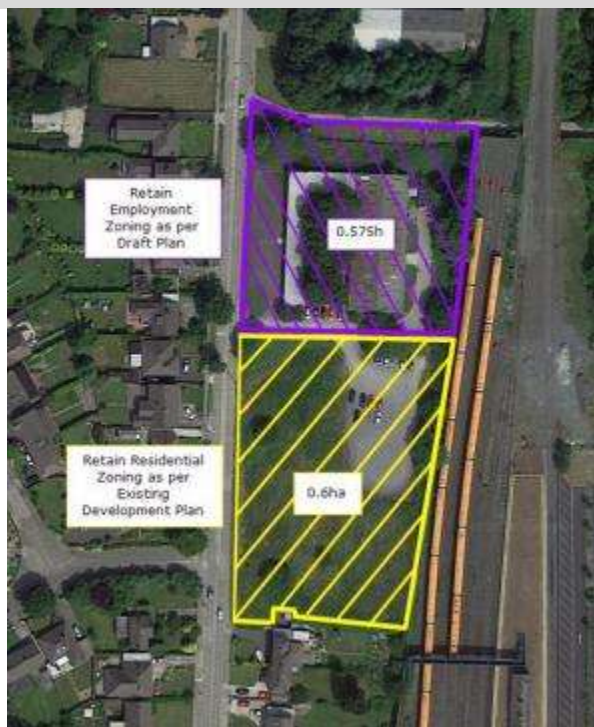
It is considered that the quantum of lands identified for development on the land use zoning map for Dundalk are sufficient to meet the population, residential, economic, and employment requirements of Dundalk during the life of this Plan. The lands in the Strategic Reserve will not be available for development during the life of this Plan.

The suggested wording would therefore not be in line with the land use management strategy in the Plan.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR391
Submitted By	Stephen Ward on behalf of Total Sigma Measurements (TSM) Limited
Theme (s):	Support and Rezone Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

The submission lands (1.175 ha) are located at The Demesne, Ard Easmuinn, Dundalk. The submission supports the Employment General (E1) zone on the lands to the north (0.57ha) but requests that the lands to the south (0.6ha) are rezoned from Employment General (E1) to Residential.

In Support

Role of Brownfield Land in an Urban Area

In accordance with national and regional planning policy the Draft Louth CDP 2021-2027 supports the role of brownfield development, Policy Objectives CS2, CS3, CS6, SS21 and SS25 are cited. The lands to the south are zoned as Residential in the Dundalk and Environs Development Plan 2009-2015.

Community Facilities in Vicinity of the Site

Map provided.

Planning Permission for Residential on lands to north of TSM.

A total of 42 no dwellings were granted permission under 19/1069, the assessment section of the planners report refers to compliance with Core Strategy and the sites context within the urban form, no reference was made to impact of the TSM facility on the application site (excerpts provided).

Existing Employment Use on the Site

TSM employs 45 people. Existing facility needs modernization (photos provided) and the southern part of the site is surplus to requirements. Development of the southern part for residential purposes would allow investment to be undertaken at existing facility.

Chief Executive's Response:

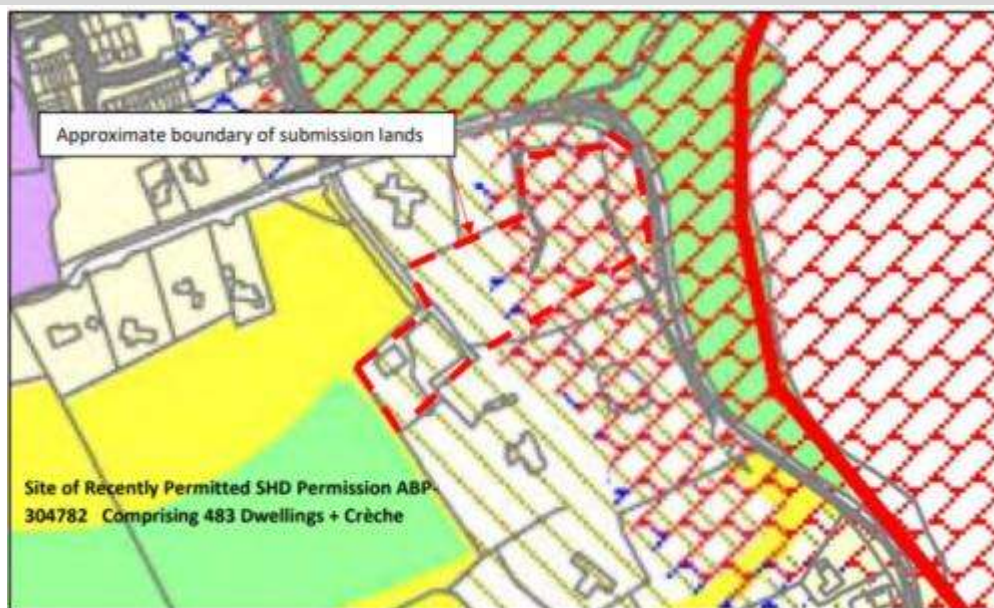
The subject lands are zoned 'Residential 1' in the 2009-2015 Dundalk Development Plan. The reason the zoning category on the lands was changed was to reflect the current use on the lands.

It is accepted however that the development of the under-utilised parts of the lands for residential accommodation would be in accordance with the principles of compact growth as set out in national and regional policy. There would be no objections in principle to the amendment of the zoning as proposed. However it is noted that part of the subject lands on which the zoning amendment is proposed are currently used as a car park. Taking this into account it is considered that the zoning amendment shall only be recommended on the lands south of this car park. As part of the preparation of the Local Area Plan for Dundalk the landowner can clarify where employees in TSM (45 persons employed in the facility at the time of writing) will park and if suitable on site car parking can be identified an amendment to the remainder of the subject lands may be considered.

Chief Executive's Recommendation:

Amend the zoning of the lands south of the existing car park in the subject lands from E1 'General Employment' to A2 'New Residential'

Submission No:	LCDP DR395
Submitted By	Stephen Ward on behalf of Mr J McKenna
Theme (s):	Rezone Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Rezone part of lands (2.12ha) from Strategic Reserve (L1) to 'New Residential' (?).

In Support:

Site Location and Context

Site is partially brownfield and occupied by agricultural sheds. Planning permission granted for conversion and extension of stone barn to dwelling (17-296). Lands to west subject to an SHD permission for 483 residential units (ABP Ref No 304782). Footpath available to Blackrock Village, Finnabair Business Park and to DKIT.

Impact of Natura 2000 Network on Development Lands

It is acknowledged that the submission lands are in proximity to Dundalk Bay SPA and Dundalk Bay SAC and are partly affected by Flood Zone A. It is therefore requested that lands outside the boundary of the Dundalk Bay and Flood Zone A be zoned for residential development.

Proposed Zoning in the Draft Louth County Development Plan 2021-2027

Strategic Reserve zoning in the Draft Louth CDP is inappropriate given the infill/brownfield nature of the site, the pattern of existing and permitted development in the area; proximity to major employment areas and DKIT.

The submission lands were assessed as part of 'Site 16' in the Infrastructure Assessment and Land Use Evaluation. The 'site' as a whole qualified as a Tier 2 site, however, only the site of the SHD was zoned 'A2-Residential'. It is submitted that should the subject lands been evaluated on their own merits, they would score more highly in terms of 'Infill/Backland' and 'Consolidation/Compact Growth'.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk and Blackrock. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR397
Submitted By	Stephen Ward on behalf of McParland Builders (IRE) Ltd / P Herr
Theme (s):	Re-zoning Dundalk - Core Strategy
Map showing lands subject to Submission:	



Summary of Submission:
The submission requests the rezoning of lands (20ha) from Strategic Reserve (L1) to New Residential (A2). Submission No. 139 also refers to this parcel of land.

See response to submission no.139 for the CE Response.

Submission No:

LCDP DR423

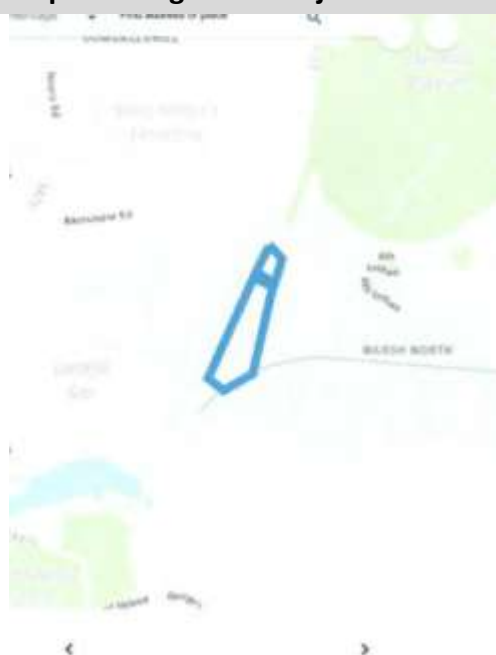
Submitted By

Eamonn Carroll

Theme (s):

Re-zone Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Submission states that there is an opportunity to formalise the Commercial Business (C3) / Retail, Leisure Recreation zoning (B5).

In Support

- Part of the land was subject to CPO by the Local Authority for the building of the Inner Relief Road
- The area is serviced and the entrance is safe in terms of vehicles and pedestrians.
- The locational advantage of Dundalk is outlined, particular reference is made to the Inner Relief Road which is located along the Dublin-Belfast Economic Corridor and has excellent access to Dublin and Belfast City Centre, Airport, Port, and surrounding Key Towns in the Region.
- The economic potential of the Drogheda-Dundalk-Newry network is identified in the NPF and RSES.
- It is stated that Dundalk's cross border links have added significance in the context of the UK's withdrawal from the EU, and potential opportunities arise. EU funding is available for Cross border projects.
- Dundalk offers well educated suitably qualified workers, supporting infrastructure, and high quality public and commercial services.
- Economic goals and purpose of the Louth Economic and Community Plan are discussed.

- Implications of the Covid-19 pandemic are outlined it is concluded that due to uncertainty the opportunities for economic growth and investment in the immediate future will be limited, the development plan ought to zone land correctly to limit potential adverse impacts.
- It is stated that the Economic Development and Employment Chapter of the Draft Plan is comprehensive
- Lands in proximity to the border accessible from the M1 should be targeted in terms of zoning and associated planning policies that facilitate appropriate development.
- The future development of the Dundalk Race Track and the potential development/ appropriate zoning of the Inner Relief is essential.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

In creating an attractive, balanced, and sustainable community it is important that existing habitats and natural heritage features of significant value are preserved where this is possible. This will make settlements such as Dundalk attractive locations to live, which will also make them attractive for economic investment.

The subject lands are zoned 'Open Space' in the Draft Plan. There is also a spot objective on these lands "To preserve the ecological character and biodiversity value of the Nature Conservation Area."

The OPW CFRAMS Flood Maps indicate the lands are located within Flood Zone A.

Having regard to the proximity of the subject lands to Dundalk Bay SPA and SAC, in addition to the location of the lands in Flood Zone A, it is considered that these environmentally sensitive lands are kept free from development and the lands are retained as open space.

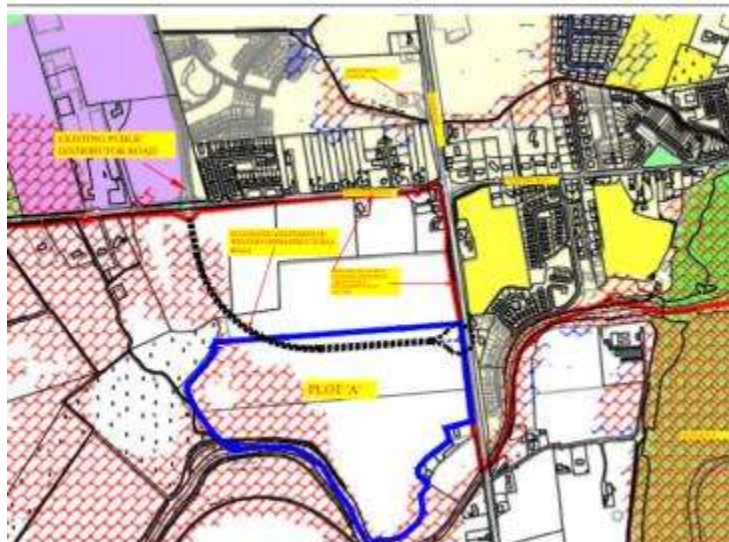
There are sufficient lands available within the town to facilitate residential and employment related development that will enable Dundalk to fulfil its potential as a Regional Growth Centre.

It is therefore the proposed zoning of the subject lands as identified in the Draft Plan is retained as open space.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR427
Submitted By:	P Herr and Associates on behalf of Uve Albrecht Bespoke Trustees Ltd.
Theme (s):	Rezone Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Request that lands (17.65ha) are rezoned from Rural Policy Zone 2 to Research, Education and Innovation (F1) or Community Facilities (G1) or institutional Lands (G2).

In Support

- Lands are presently located within the Dundalk and Environs Settlement boundary.
- Settlement boundary now runs along Clermont Road rather than the Fane River, no rationale has been provided for reducing same.
- Advantages of the site include road frontage onto the R132, located close to the western infrastructural road, can be serviced by public water main and the recently upgraded foul water infrastructure and the majority of the lands are located outside the flood zone.
- Omission of these lands represents poor usage of well positioned and serviced part of Dundalk.
- Site would be ideally suited to the development of educational/community/social infrastructure with associated recreational resources.
- Heavy traffic flow into the town will be counterbalanced.
- Proposal will comply with SC7, SC8, SC9, SC11, SC12, SC25 SC26, SC27, SC29 and SC30.

Chief Executive's Response:

Under the 2009-15 Dundalk Development Plan the subject lands were zoned 'Agriculture'.

In re-defining the development boundary of Dundalk it was considered that the previously zoned agricultural lands should be omitted so as to clearly define the urban boundary of Dundalk.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. The zoning of lands for Community facilities must also be in the appropriate locations and promote sustainable travel patterns.

National and regional policy requires future settlement growth to be focused on consolidation and compact growth. Development on the edge of settlements would facilitate the creation of suburban car dependant sprawl which is considered to be an unsustainable pattern of development, particularly when there are alternatives available on other more suitably located undeveloped lands.

Having regard to the location of the lands which are detached from the urban settlement boundary it is considered the development of the lands would not follow the sequential pattern of development and would result in the creation of suburban sprawl that is inconsistent with national and regional policy. Furthermore, part of these lands are located within Flood Zone A which would preclude the consideration of highly vulnerable development.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR435
Submitted By	Jacobs Engineering Ireland Ltd on behalf of IDA Ireland
Theme (s):	Chapter 5, REZ Dundalk
Summary of Submission:	

IDA Ireland supports the policies and objectives of the draft plan in respect of employment and the framework to facilitate high-value employment opportunities. SO1 and SO2 of the draft Louth CDP 2021-2027 are specifically mentioned.

IDA Ireland supports the recognition of the Business and Technology zoning in the south-west of Dundalk as a key node that can support Foreign Direct Investment. Given the successes of the area, IDA Ireland recommends that additional land is zoned to accommodate high-value employment, including FDI, within the town to support the long-term aspirations to grow Dundalk to its role as a Regional Growth Centre that can accommodate a population of 50,000.

Louth County Council has built on the opportunities presented in the town to develop a zone suited to the development of Business and Technology uses at Mullagharlin. This location is appropriate for expansion to facilitate the growth of the sector and offers significant opportunities to develop synergies between firms, with the wider business network and with the third-level education and research facilities of Dundalk Institute of Technology.

Rationale:

IDA Ireland

Mission of agency is outlined. Regional development is a key pillar of IDA Ireland's strategy. IDA strategy is to continue the uplift in regional investment for each region outside Dublin. The benefits of Foreign Direct Investment to Ireland are outlined.

There is a growing, keen interest and investment in developing R&D projects that has positioned Ireland as one of the leading R&D locations in the world with an exceptional level of collaboration between stakeholders. IDA Ireland's clients create high-value jobs with average salaries consistently above the national average they account for one-third of total income tax, USC and employers PRSI paid by companies in the state. Economic benefits of multinational companies are outlined. IDA Ireland is in a strong position to attract investment opportunities.

Strategic Role of Dundalk

Companies located in Dundalk are within easy reach of universities and higher education colleges, international airports serving 290 destinations, intercity rail, motorway, deep seaports, a strong enterprise ecosystem and 35% of Ireland's young and highly educated workforce, both in the Republic of Ireland and Northern Ireland. Previous work by IDA Ireland in 2015 identified a population within a 60-minute drive of Dundalk of 1,296,061. Together, Dundalk and Drogheda have the largest population catchment in the country after Dublin. Dundalk Institute of Technology plays a pivotal role in the town's development.

National Policy - NPO 6, 11, 44 are specifically mentioned.

Regional Policy - Dundalk is designated as a Regional Growth Centre. RPO 4.21 is cited.

Local

The Louth CDP 2015-2021, the Louth Local Economic and Community Plan 2016-2022 are the North Eastern Regional Enterprise Plan specified. Support for Strategic Objectives S01 and S02 are expressed It is stated that IDA Ireland fully supports the policy measures put in place to enhance the role of Dundalk and those that recognise the role of FDI employment in attaining its full potential to achieve balanced regional development

Potential Mullagharlin Expansion

This part of the town meets those key requirements to attract high-quality employment opportunities, including FDI investment:

- Proximity to power lines and substation (38kv and 110kv) and transmission capacity;
- Proximity to dark fibre;
- Proximity to M1 Junction 16, with regional and international connectivity;
- Access to water supply mains and pumping station;
- Access to natural gas supply;
- Infrastructure to support FDI exists and with further investment can continue to be a key enabler to FDI;
- Approx. 1km from Dundalk Institute of Technology;
- Suitable topography;
- Environmental capacity

The Mullagharlin Framework Plan 2008 established the framework for the development of the lands, major employers outlined. Ability to attract major investment and employers to this quadrant of the town demonstrates the success in identifying the needs of employers and the collaboration of the full range of statutory stakeholders.

With the take up of land for FDI investment, IDA Ireland has reviewed the extent, nature and characteristics of the available lands zoned for Business and Technology use and considers that additional land should be zoned for this purpose as part of the Louth County Development Plan.

Attracting investment involves a number of factors. From a land-use planning policy perspective, the timely identification of lands, the preparation and adoption of a clear, adaptable long-term development framework, and the provision and enhancement of key infrastructure and services is essential. The current draft Louth County Development Plan 2021-2027 provides a timely opportunity to establish this additional resource.

The expansion of the Mullagharlin lands should be northwards rather than south wards for the following reasons:

- Allows for the continuation of Business and Technology uses, not split by residential development along Marlboro Road;
- Availability of large, coherent land parcels, not restricted by existing road network;
- Coherence in zoning which does not increase the town extent;
- Provides better connectivity back to Dundalk town centre;
- Better connected to N52 and national and international connectivity;
- Proximity to infrastructure serving existing Mullagharlin framework;
- Environmental constraints can be accommodated and mitigated within the development framework.

Lands should be subject to a master plan which would allow for phased expansion.

IDA Ireland fully supports the draft Louth County Development Plan 2021-2027 in continuing to prioritise this strategic location for Business and Technology uses. We consider that additional land should be zoned for employment uses in the south-western part of Dundalk, expanding the current Business and Technology area.

Chief Executive's Response:

The CE welcomes the IDA support for the strategic objectives in the Draft Plan which promotes the role of Drogheda and Dundalk as Regional Growth Centres in driving the economic growth and harnessing the economic and employment potential of the County.

The Council is committed to continuing to promote and facilitate economic and employment investment in both Regional Growth Centres in order to ensure they can fulfil their potential as drivers of economic growth in the County and wider region. The Council will continue to engage and work closely with infrastructure agencies and providers in identifying the investment requirements and facilitating the progression of infrastructure projects that will ensure the Regional Growth Centres can maintain and enhance their economic competitiveness.

The Council will also continue to work closely with the IDA in identifying suitable locations for inward investment in the County. In this regard the Council welcomes the recognition in the submission of the strengths and competitive advantage of Dundalk in attracting economic investment; including the access to an educated workforce on both sides of the border, excellent road, rail, and sea connections, and a strong enterprise base.

The Council welcomes the recent successes in attracting investment to the IDA Science and Technology Park in Dundalk and acknowledges the importance of the long-term policy framework put in place as part of the Mullagharlin Framework Plan in 2008 in securing such investment.

In this regard the Council welcome the commitment by the IDA to the future expansion of the Science and Technology Park in Dundalk by requesting the identification of additional lands for a Business and Technology use as this is an endorsement of the designation of Dundalk as a Regional Growth Centre and its potential to strengthen its position as a driver of economic growth in the border area.

To the north of the existing Business and Technology zoned lands there is a significant parcel of undeveloped lands identified as a 'Strategic Reserve' and 'Open Space'. These lands would form a natural extension to the Science and Technology Park and could be accessed via the N52 through the existing lands. It is therefore considered c.28 hectares of this 'Strategic Reserve' could be rezoned as 'Business and Technology' in order to facilitate future economic investment in the town in the medium-long term.

The development of these lands would be subject to the preparation of a Master Plan. This Master Plan shall set out the details regarding design and layout of the business, enterprise, or employment related development on the Master Plan area, any mitigating measures to address any environmental or land use constraints associated with the lands, access and service arrangements, the phasing of the build out of the lands, and how the amenities of local residents in the immediate vicinity of the lands will be protected.

In conclusion, strengthening the economic and employment base of the Regional Growth Centre of Dundalk is a strategic objective of the Development Plan. The Mullagharlin area of the town has had notable success in attracting high-value employers to the town. It is important to continue to build on this in order to support the economic growth of the town in the long term. It is therefore proposed to identify an additional c.40 hectares of land as 'E2 Business and Technology'.

Chief Executive's Recommendation:

Amend the land use zoning of the c.40 hectares of land on the map below from L1 'Strategic Reserve' and H1 'Open Space' to E2 'Business and Technology'.



Include a Spot Objective on these lands indicating a Master Plan is required in Table 13.2 as follows:

Spot Objective Number	Location	Objective
3	Dundalk	To require the preparation of a Master Plan. See Master Plan 7 in Table 13.1 for further details.

Insert the following into Table 13.1

Master Plan Number	Settlement	General Description	Status
7	Dundalk	These lands form an extension to the Mullagharlin Framework Plan and will provide opportunities for continued economic investment and employment generating development in Dundalk. The development of these lands shall be closely aligned to the design and layout of the adjacent lands to the south as agreed under the Mullagharlin Framework Plan, particularly with regard to access, and construction and delivery of services, and also delivering a high level of connectivity and permeability between the lands.	Pending

The proposed Master Plan shall include details of the design and layout of any buildings, how any potential environmental or land use constraints will be addressed, how the amenities of local properties and services will be preserved, and the proposed phasing for the build out of the lands.

Particular consideration shall be given to the potential impacts of any development of the lands on Killally Graveyard and the access to same, with appropriate landscaping and buffer zones integrated into any layout to protect their character and setting. The Master Plan shall also examine opportunities for and the feasibility of the restoration of the former quarry, together with any future intended uses of the former quarry.

Submission No.

LCDP DR436

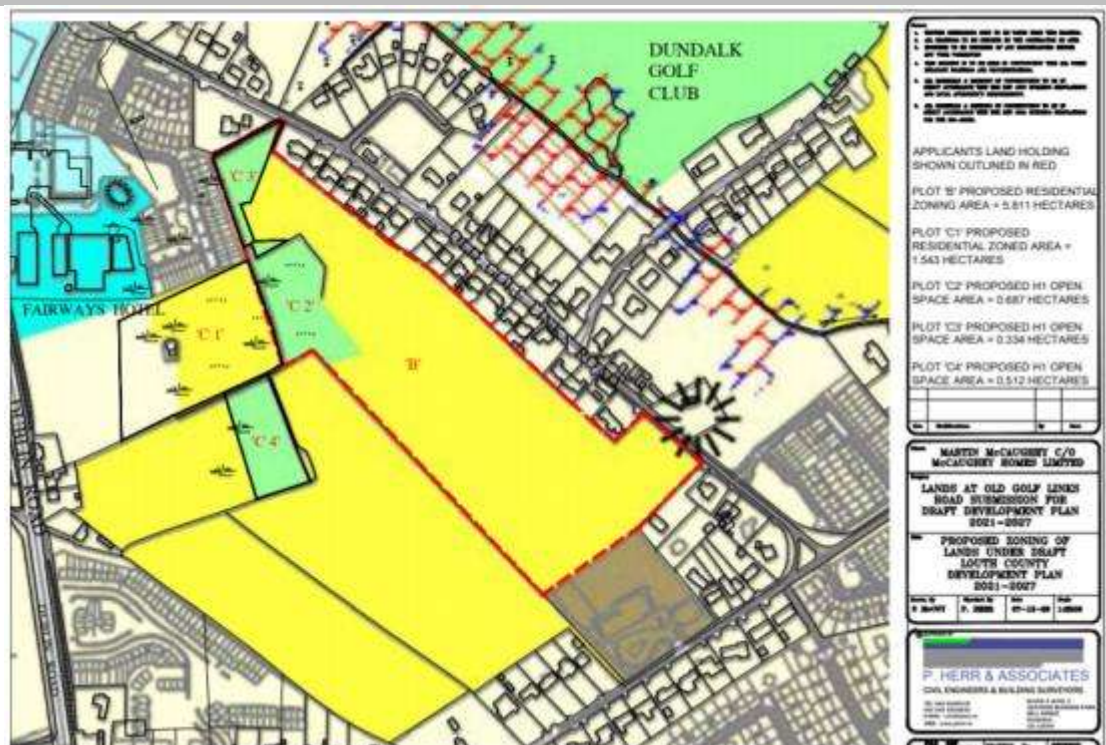
Submitted By

P Herr and Associates on behalf Martin McCaughey

Theme (s):

Rezone Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Request that:

1. C1 re-zoned from Residential to Open Space (as per the Dundalk and Environs Development Plan 2009-2015)
2. C3 re-zoned from Open Space to Residential (as per the Dundalk and Environs Development Plan 2009-2015)
3. C4 is re-zoned from Open Space to Residential (as per the Dundalk and Environs Development Plan 2009-2015)

In Support:

- Under the draft Louth CDP 2021-2027, lands are also zoned a mixture of New Residential and Open Space, however the area pertaining to Open Space has been increased by 0.334ha (C3)
- In the Dundalk and Environs Development Plan 2009-2015 'C1' was zoned as recreational, amenity and open space this has been rezoned to residential.
- C3 and C4 were zoned as residential in the Dundalk and Environs Development Plan 2009-2015 they are now rezoned to Open Space.
- The part being rezoned to open space (C3) is in the clients' ownership.
- The areas zoned open space are now fractured and split across landholdings, it is difficult to provide meaningful open space in these circumstances.

Chief Executive's Response:

The amendment to the land use zoning on the subject lands was proposed and agreed by way of a Councillor motion to the Draft County Development Plan. The areas of open space identified as 'C2' and 'C3' have a watercourse traversing through them and are marshy in places. These lands, in addition to the area identified as 'C4' were identified as a wetland in the Louth Wetland Survey Three Year Survey Project. The lands were identified as having a local (low) conservation value.

Section 8.8 of the Draft Plan 'Wetlands' provides a narrative on wetlands. Policy Objective NBG 19 requires an appropriate level of ecological assessment to be carried out for proposals involving the drainage, infill, or reclamation of wetland habitats.

Taking account of the fact that the lands are marshy with a watercourse traversing through them an open space zoning is considered to be appropriate. There would be an opportunity for this open space to be integrated into the design of any residential development of the residentially zoned land in the remainder of the subject area 'B' as identified on the map above.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR0458

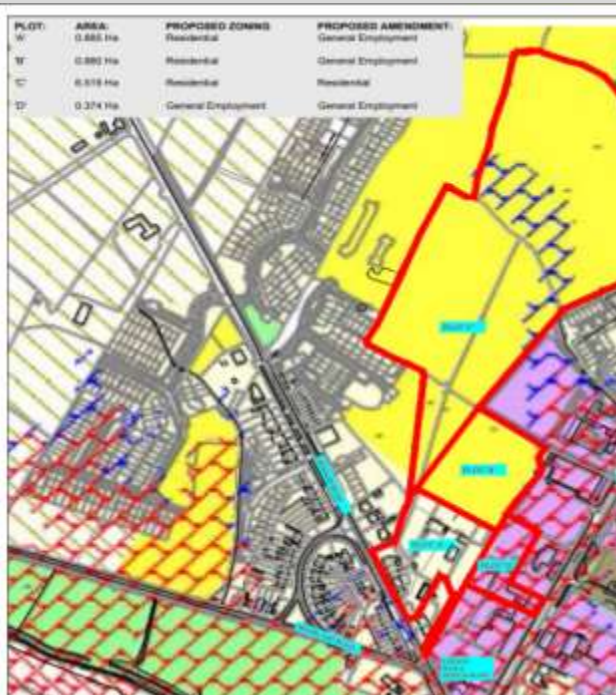
Submitted By

P. Herr and Associates on behalf of Freddie and Patricia Johnston

Theme (s):

Rezone Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Rezone lands at north of R177 and west of the R132 Dundalk. The lands are zoned as A1 Existing Residential (A1), New Residential (A2) and General Employment (E1). The following is requested:

Plot No. As per Fig.2	Area	Proposed Planning (under Draft Plan)	Requested Amendment to Draft Zoning
A	0.885 Ha	Residential	General Employment
B	0.880 Ha	Residential	General Employment
C	6.519 Ha	Residential	Residential
D	0.374 Ha	General Employment	General Employment

In Support:

The SE portion of land is used as a small retail, petrol filling station, car and lorry wash facility and oil distribution centre. The New Residential zoning does not reflect the current land –use on the site.

It is intended to develop the remaining lands for residential purposes over the lifetime of the Plan. Concern has been raised that the current zoning will prohibit expansion and extension of existing use on site.

Chief Executive's Response:

It is acknowledged that there is an established use on the lands zoned 'A1 Existing Residential' for a fuel service station in addition to associated buildings used for the sale of goods including coal and turf. Any expansion to these facilities could be assessed as a 'Non-Conforming Use' i.e. an established use that does not conform with the land use zoning. Details of how such applications would be assessed are set out in section 13.19.2.4 of the Draft Plan. However it is acknowledged that the adjacent lands to the east are zoned 'General Employment' and that this zoning could be extended to include the subject lands. Any existing residential properties would have the A1 'Existing Residential' zoning retained in order to reflect the current use of these properties.

The proposal to identify an additional 0.9 hectares of 'General Employment' lands to the north of the existing service station and associated facilities would tie in with the zoning of the adjacent lands to the east, which include an Aldi store, car showroom, and service station and would provide a cluster of employment generating uses in this part of the town. There would be no objections in principle to changing this zoning to 'General Employment' subject to any future use being compatible with the residential use in the surrounding area. This would be assessed as part of any planning application in the Development Management process.

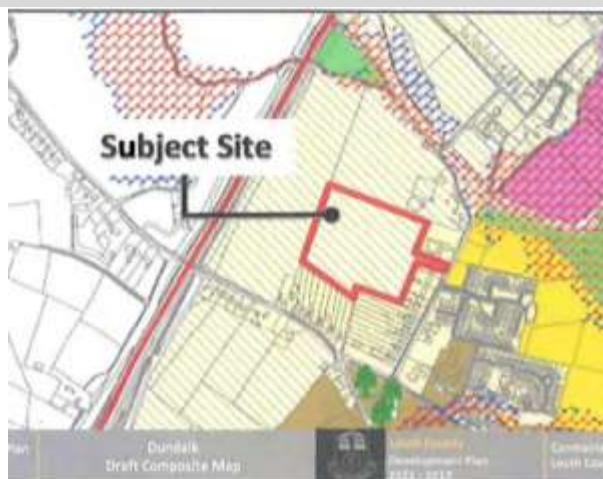
Taking account of the fact that there is an excess of lands zoned for residential uses in Dundalk, the amendment of this 0.9 hectares of A2 'New Residential' lands would not result in a deficiency of residential lands in the town.

Chief Executive's Recommendation:

Amend the land use zoning on the subject lands as follows:

1. Change the A1 'Existing Residential' zoning of the fuel service station, associated buildings, and service yard to E1 'General Employment' (the A1 'Existing Residential' zoning of any existing residential properties shall be retained)
2. Change the A2 'New Residential' in Plot B as indicated on the map (0.885 hectares) to E1 'General Employment'

Submission No:	LCDP DR584
Submitted By	EHP on behalf of Sean Marmion
Theme (s):	Rezone
Map showing lands subject to Submission:	



Summary of Submission:

Request to rezone lands (14 acres) off Toberona Road, Dundalk from Strategic Reserve (L1) to New Residential (A2)

In Support:

- There is existing residential development along the Toberona Road, development of the site would reinforce neighbourhood.
- In the existing Dundalk and Environs Development Plan 2009-2015 the site is zoned residential,
- Re-zoning diminishes site's value and development potential.
- Policy Objective CS 10 seeks to prioritise the preparation of an LAP, it's important for the future development of the site that the draft zoning maps for Dundalk are revised.
- Policy SS 2 of the Louth County Development Plan 2015-2021 is cited
- Subject site would counterbalance unsustainable sprawl that has taken place to the south of Dundalk in proximity to the Junction 16 of the M1, and in Blackrock.
- NPO 3a, NPO 3c NPO28, NPO 33 of the NPF are highlighted.
- RSES state that Dundalk should achieve a target of 50,000 people by 2032, RPO 9.3 is mentioned.
- Subject site is in proximity to Junction 17 of the M1/ Belfast- Dublin corridor is in proximity to necessary infrastructural connections and to social infrastructure, is easily accessible via public transport and within a short walking/cycling distance of Castletown Road shops/Dundalk town centre.
- Policy Objective CS6 of the draft Louth CDP 2021-2027 is quoted.
- Site could be developed in conjunction with an Approved Housing Body or Louth County Council.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town to fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Residential 2' in the 2009-2015 Dundalk Plan and are in Phase 3 of the Phasing Strategy for the town, meaning they are a lower priority for development.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Dundalk and the quantum of lands required to meet these demands.

The Infrastructure Assessment identified that considerable investment in transport and water services infrastructure would be required to release these lands for development. Taking this into account, in addition to the fact that there is an excess of residential lands in Dundalk, the lands were placed in a Strategic Reserve.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR588
Submitted By	Residents of Carnabreagh area
Theme (s):	Support Zoning Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Support lands outlined in red being located within Rural Policy Zone 2

- In the Dundalk and Environs Development Plan 2009-2015, this is the only piece of lands west of the M1 zoned under the urban area of Dundalk, this is totally at odds with the remainder of Dundalk.
- Recycling facilities are open for consideration under this zoning.
- M1 provides an appropriate division between the urban area of Dundalk and the rural area, assisting with the provision of a greenbelt, maintenance of compact growth and prevention of sprawl as per the NDF
- The land is characterised by rolling topography and hedgerows, these should be maintained.
- Chapter 5 of the draft Plan supports rural diversification projects subject to the use and scale of development. Any future development on the site should have regard to the character of the immediate area i.e. one off houses and agricultural land.
- Furthermore, it is noted that 'new employment related developments are directed to settlements where services are available', accordingly a large scheme would be wholly inappropriate in this area and would adversely encroach on the rural landscape. It should instead be directed to settlement so assist achieving compact growth.

Chief Executive's Response:

The land use zoning of the subject lands was removed as it was considered that the Motorway is the logical development boundary for Dundalk and the future expansion of the town should be concentrated on the eastern side of the Motorway.

There is specific guidance in Chapter 5 (Section 5.19 Rural Economy) and Chapter 13 (Section 13.11.11 'Employment Development in Rural Areas') setting out the standards and criteria against which employment generating developments in the open countryside are assessed.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR0593

Submitted By

Lorcan and Michelle Goss

Theme (s):

Rezone Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Rezone lands shaded yellow on map from Rural Policy Zone 2 to allow building of nursing home or individual houses for older people. Lands are close to Junction 17 of the motorway.

Chief Executive's Response:

The subject lands are located in the open countryside outside any settlement.

Section 4.12.1 'Residential Care, Retirement and Nursing Homes' in Chapter 4 'Community Facilities' sets out the guidance in relation to the location of these facilities. It is indicated that these services and facilities should be accommodated in the Level 1, 2, 3, and 4 settlements and there should be a presumption against the provision of these facilities in the open countryside for reasons relating to unsustainability, poor accessibility, social exclusion, and visual intrusion.

Chapter 3 'Housing' includes a specific section on 'Housing for Older People' in section 3.8 where reference is made to the Policy Statement 'Housing Options for Our Ageing Population'. This Policy Statement highlights the importance of locating housing for older people close to local amenities and services to allow people to retain and enhance their general independence.

Taking the above into account, the subject lands are considered inappropriate for either a nursing home or individual housing for the elderly due to the location of the lands in the open countryside where there are no existing services or amenities. This location would also be contrary to the provisions of the Draft Plan as set out in section 4.12.1 and 3.8.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR00594
Submitted By	Downey Planning on behalf of Merit Holdings
Theme (s):	Support for Zoning Dundalk
Map showing lands subject to Submission:	



Summary of Submission:

Site pertains to lands (20.3ha) at Dublin Road, Haggardstown, Dundalk, support for the following is expressed:

- Under the current Dundalk & Environs Development Plan 2009-2015, lands (c19.4ha) are zoned 'Employment and Business', with a small portion (0.9 ha) zoned 'Residential 1'.
- Under the Draft Development Plan, the lands currently zoned 'Employment and Business' are proposed to be rezoned to 'C1 – Mixed-Use' land uses.
- The residential lands to the west are proposed to be zoned 'A1 - Existing Residential', which is the same objective as the current Development Plan.

Planning history of the site (planning reference 07/1385) and the lands to the north (planning references 16/803, 10/09 and 06/1624 as extended by 12/59 and ABP reference 303891-19), is provided.

An analysis of the national and regional planning policy is provided. In terms of the NPF, NPO 7, 33 and 35 are cited. It is stated that the NPF emphasises the renewal and development of existing settlements, rather than continual expansion and sprawl of cities and towns. The RSES identifies Dundalk as a Regional Growth Centre.

A copy of Table 3.2 of the RSES is provided. The following Regional Policy Objectives are specifically mentioned: RPO 4.19, 4.20, 4.21, 4.22, 4.23, 4.24 and 4.25.

A synopsis of the current and proposed zoning on the land is provided along an outline of the 'Generally Permitted Uses' and those 'Open for Consideration' on the 'Mixed Use' zoning in the draft Louth CDP 2021-2027. *The submission states that 'residential use' is not to be considered "ancillary" but rather can be provided for in its own right as part of a planning application.*

It is their understanding that the purpose and vision of the mixed use zoning does not place a limitation on the residential element.

It is requested that reference to the strategic need to locate the future vehicular entrance to the subject lands as well as the adjoining zoned lands via an upgrade to the existing signalised junction at the Xerox Technology Park on the Old Dublin Road.

This location was always intended to be the primary point of access to these lands and the adjoining zoned lands. The owners of the subject lands own 2 no. properties and land at this strategic location and as such can readily provide the required vehicular access to the lands.

The submission indicates that the Framework Plan is 12 years old and has been superseded by more recent planning policies and guidelines issued under Section 28 and 29 of the Planning and Development Act and as such may not be consistent with them. It is requested that the wording in Table 13.1 of the Draft Development Plan should therefore be amended to remove the text: *“Any future development taking place within the Framework Plan Area shall comply with the requirements of this Framework Plan or any updated Plan.”*

Chief Executive’s Response:

The subject lands form part of the Mullagharlin Framework Plan in the Character Area ‘Finnabair South’. This mixed use area is envisaged as consisting of employment, commercial development, health care, student and residential housing and may also incorporate links to the adjacent Dundalk Golf Course. The type of uses envisaged on these lands include a mixture of higher order business uses supported by cafes/restaurants, community facilities, office, health care, residential, and business units.

The additional reference requested to be made in relation to the location of the proposed entrance to the lands is something that is not considered necessary at this stage. This can be examined in greater detail as part of the preparation of the Local Area Plan for Dundalk.

With regard to the removal of the text in Table 13.1 it is not considered that this is necessary. The Mullagharlin Framework Plan will provide the overall design Framework for the development of the lands in the Framework Plan area. In the interests of clarity additional text could be inserted into section 13.5 ‘Master Plans’ indicating that where any Section 28 guidance documents are referenced in Master Plans have been superseded or any additional Section 28 guidance that may be of relevance to a Master Plan Area the updated Section 28 guidance shall apply.

Chief Executive’s Recommendation:

Insert the following text after the last paragraph in section 13.5:

There may be instances where Section 28 guidance that is referenced in Master Plans or Framework Plans is superseded by updated guidance. Additional Section 28 guidance may also be published that is relevant to specific Master Plans or Framework Plans. When this situation arises, the most up to date guidance shall be used in the preparation and assessment of planning applications relevant to the Master Plan or Framework Plan area.

Submission No:	LCDP DR0595
Submitted By	Downey Planning on behalf of Merit Holdings
Theme (s):	Support for Zoning Dundalk, Objective Add policies
Map showing lands subject to Submission:	



Summary of Submission:
Site pertains to lands (3ha) at Redcow, Dundalk, support for the following is expressed:

- Under the current Dundalk & Environs Development Plan 2009-2015 the lands are zoned 'Tourism and Leisure'.
- Under the Draft Development Plan that is currently on display, the lands are similarly proposed to be zoned 'I1 – Tourism and Leisure'.

It is also requested that:

- An objective is placed on lands supporting the raising of the ground level, subject to appropriate environmental and ecological assessments, in order to facilitate tourism and recreation developments.
- The Plan provides for appropriate policies that would encourage and facilitate improved public transport and pedestrian connectivity between the lands and the town centre in order to support a modal shift away from private car borne travel.

Planning history of the surrounding area is provided (planning references: 10/102, 20/986, 18/556, 17/786 and 15/520).

An analysis of the national and regional planning policy is presented. In terms of the NPF, NPO 7 is cited. It is stated that the development of tourism and leisure facilities on appropriately zoned lands at the edge of Dundalk town, that has direct motorway access can have synergistic benefits with the existing racecourse is consistent with the aims of the NPF.

The RSES identifies Dundalk as a Regional Growth Centre. A copy of Table 3.2 of the RSES is provided. The following Regional Policy Objectives are specifically mentioned: RPO 4.19, 4.20, 4.21, 4.22, 4.23, 4.24 and 4.25.

A synopsis of the current and proposed zoning on the land is provided. It is stated that the vision and objective for this zoning is suitable as they benefit from their proximity to Dundalk's town centre as well as existing amenities and facilities.

The lands are currently prone to flood risk however this can be safely overcome through a careful and sensitive raising of the levels, as has taken place on lands to the west (Reg. Ref. 18/556 refers).

It is requested that an objective is placed on lands supporting the raising of the ground level, subject to appropriate environmental and ecological assessments, in order to facilitate tourism and recreation developments.

It is also requested that the plan provide for appropriate policies that would encourage and facilitate improved public transport and pedestrian connectivity between the lands and the town centre in order to support a modal shift away from private car borne travel.

Chief Executive's Response:

The development of the subject lands would require detailed investigative works with regards to the potential impacts of flooding due to the location of the lands in Flood Zone B. This will include the preparation of a Site Specific Flood Risk Assessment, which will include recommendations and potential mitigating measures that will alleviate or reduce any flood risk. In the absence of such investigative works it would not be appropriate to include a specific objective regarding the raising of ground levels.

There are numerous policy objectives in the Draft Plan, and in particular in Chapter 7 Movement that support more sustainable modes of transport and a reduced dependence on the private car e.g. MOV 5 and MOV 10.

Chief Executive's Recommendation:

No Change

Submission No.	LCDP DR650
Submitted By	Cllr Marianne Butler, Cllr Maria Doyle and Cllr Pio Smith.
Theme (s):	Rezone Dundalk
Map showing lands subject to Submission:	
No map submitted	
Summary of Submission:	
• This submission pertains to the zoning of lands to the South of Louth County Hospital in Dundalk (6.42ha) at the rear of Bayview House, Dublin Road. • At a meeting of Louth County Council on 1st October, 2020 for the purpose of making the draft Plan it was agreed to change the zoning on this site from A1 Existing Residential to G1 Community Facilities. • A number of sites in Dundalk subsequently changed to A1 Existing Residential from their respective zonings (H1 Open Space, L1 Strategic Reserve and C1 Mixed Use – these sites are located at Hoey’s Lane, Mounthamilton on Carrickmacross Road and beside the Railway Bridge at Castletown Road. • We propose that the 6.42 acre site beside the Louth County Hospital revert back to A1 Existing Residential and as a result that the other sites are no longer zoned A1 Existing Residential and that they revert to H1, L1 and C1. • The site beside the hospital was purchased by the HSE in 2004 at a cost of €2,439,600. A freedom of information request stated that the “The HSE has no specific plans for this site at present due to its location it remains strategically important to the HSE”. • In light of the public housing crisis and the acknowledgement of the need to build more public housing on public land, it would seem regressive to take this option away in respect of this piece of land without the HSE actively requesting it or having engaged directly with the council’s development plan process. • The site may be of interest to the Land Development Agency. The HSE could be accused of land hoarding as they have done nothing with this site for over sixteen years, when we are experiencing a housing crisis and when it has been shown that developing houses on public lands can be significantly more economical. • While it is not required, we believe it is appropriate for the HSE to make their own submission with regard to their future intentions for this significant site and to consult with the forward planning unit of Louth County Council about whether a change of zoning is actually required in this instance. • The A1 Existing Residential zoning under Generally Permitted Use allows for Community Facility, Nursing Home, Residential, Residential Institution, Retirement Village, Sheltered Accommodation Healthcare Practitioner is also an “Open for Consideration”. The A1 Existing Residential zoning is compatible with a number of healthcare and community related options as stated above.	

Chief Executive's Response:

The amendments that are the subject of this submission were proposed by way of a Councillor motion and subsequently passed by the Elected Members.

Chief Executive's Recommendation:

No Change

Submission No.**LCDP DR701****Submitted By**

Walter P Toolan and Sons on behalf of Wild Ireland Defence

Theme (s):

Zoning change

Map showing lands subject to Submission:

No map submitted

Summary of Submission:

A rezoning submission was lodged By Mr Carroll to Louth Co. Co. regarding the conversion of "new residential" zoning to 'open space,' for lands at rear Stamanaran, (2.7 acre) it is requested that this is not supported by Louth County Council and lands remain zoned as open space.

- Mr Carroll states that the Wetland area is currently "inaccurately" zoned as open space. Details regarding a landfill license issued from Louth County Council are provided. Mr Carroll states that the lands are no longer a wetland.
- Until August 2020 this land had been designated as a Wetland by Wetland Surveys Ireland (Site Code LH173) and it appears that Wetland Surveys Ireland proposed to remove the 2.7 acre site from the Louth Wetland survey forthwith. It is questioned as to why this has happened.
- Site has been subject to unauthorised development, a number of enforcement files have been opened including file references 16U032 and 20U O23 (the latter is currently open). Within File 16U032 the site is described as a 'Wetlands site'.
- The owner has taken steps to degrade and obliterate the wetland site and now seeks to convert same to development land.
- At a County Council Meeting of 23 September 2020 that the Chief Executive of Louth County Council, when the issue of the proposed re-zoning of this property was raised, informed the Meeting that she had to receive Legal Opinion on this matter. A copy of the legal opinion is requested.
- The site is an important Wetland and has been referred to in an Ecological Survey of Blackrock commissioned by Blackrock Tidy Towns Committee in 2006.

- Findings of the “Louth Wetland Identification Survey “ by Foss, Crushell, O’Loughlin and Wilson of 2011 and the Biodiversity Action Plan for Louth 2008-2012, are also referred to.
- Wetland sites are under severe pressure and their destruction will lead to adverse flood related problems, furthermore the site is located close to Natura 2000 sites. Louth County Council should not support same.

Chief Executive’s Response:

On the zoning map for Dundalk in the 2009-2015 Development Plan the subject lands are zoned for ‘Recreation, Amenity, and Open Space’ uses. In the Draft County Development Plan the lands are zoned ‘New Residential’. The amendment to the land use zoning on the subject lands was proposed and agreed by way of a Councillor motion to the Draft County Development Plan.

The submission refers to the lands being designated as a wetland in the Wetlands Ireland Survey. The table below, which is an extract from the Wetlands Survey 2012 indicates that the lands within the survey boundary “have been heavily impacted by infill and drainage”. The subject lands have been infilled.

Site Code	Site name	Easting	Northing	Site Description	Survey site EU habitat comments	Conservation ranking after survey
173	Haggardstown	306052	303183	Area of former marsh that has been heavily impacted by infill and drainage. Small remnants of wetland vegetation restricted to drainage ditches and a small degraded marsh area in southern part.	It is not thought any of the habitats present correspond to any of the habitats listed under Annex I of the EU Habitats Directive.	E Rating: Local conservation value (low value)

With regard to the legal opinion at the Council Meeting of the 23rd September 2020 this was in relation to procedural issues.

The Enforcement Files referred to in the submission are closed.

Any planning application on the subject lands would be required to take account of the location of the lands adjacent to an identified wetland, with appropriate mitigating measures required to be included with to minimise any potential adverse impacts on the integrity of the adjacent wetland.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR706

Submitted By

Paul Reilly on behalf of Michael Begley

Theme (s):

Rezone outside Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Request Re-zoning from of site (0.466ha) from Strategic Reserve (L1) to Light Industrial Manufacturing.

In Support:

- Site located in close proximity to Junction 17 of the Motorway.
- Site consists of a light industrial unit utilized for the upholstering and selling of sofas, there is an existing cottage and agricultural sheds in situ.
- The business has been in operation for c. 20 years and employs 4-6 people at peak times.
- Rezoning will offer the opportunity for the business to expand/ extend in the future.

Chief Executive's Response:

It is acknowledged that there is an established light industrial unit on the subject lands that are have a land use zoning 'Strategic Reserve' in the Draft Plan (retention granted in 2004 under planning ref. 03/902). The adjacent residential properties are also zoned 'Strategic Reserve'.

Section 13.9.2.4 of the Draft Plan 'Non-Conforming Uses' provides for applications to be considered that do not conform with the land use zoning. In addition 13.19.2.3 recognises that certain uses may not be listed in the list of potential uses for the land use zoning and where this arises applications will be considered on their individual merits. Taking this into account it is not considered necessary to amend the land use zoning as proposed.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR0712

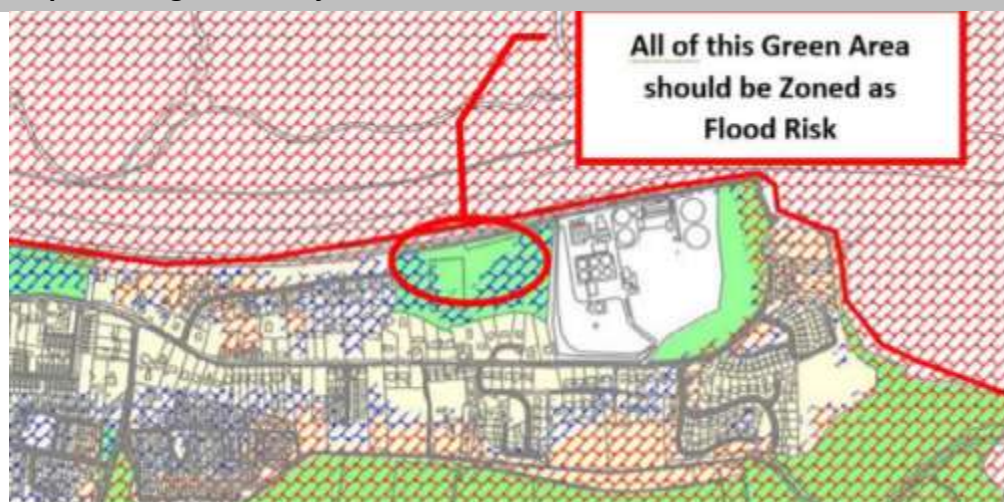
Submitted By

Joanne and Dennis Daly

Theme (s):

Flood Maps Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Request that the entire site be Zoned Flood Risk A and B.

- The land is only partially shown as Zone B flood risk - we believe that this full area shown in green in the above map (to the left of the Waste Water Treatment Plant) should be zoned as flood risk
- We also believe that this area should be zoned as Zone A flood risk - we have photographs of flooding in this area and can produce same on request.

Chief Executive's Response:

The Flood Maps published with the Draft Plan are from the OPW CFRAM Flood Mapping. This is the most up to date flood mapping there is available for Dundalk. It is noted that the submitters indicated they have photograph indicating the subject lands in flood. On the OPW website there is a form available where information on past flood events can be submitted. The submitter was sent details of how to send this information to the OPW if they so wished.

The proposed zoning objective on the subject lands is H1 'Open Space' in the Draft Plan. In accordance with Table 3.1 of 'The Planning System and Flood Risk Management' Guidelines, amenity open space is considered to be a 'water-compatible development'. Any planning application on these lands for development that would be vulnerable to flooding would require a Justification Test and Flood Risk Assessment to be carried out where further analysis and investigations in relation to localised flooding could be carried out.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR756

Submitted By

Antoinette Loughran

Theme (s):

Rezone Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Request rezoning from Rural Policy Zone 2 to Residential

In Support :

- I am in the early stages of applying for planning permission to build a residential dwelling on my father's land in Haggardstown.
- The site in question is proposed rural, there is a house immediately to the east, a row of houses 400m to the west and directly across the road.
- This land was bought by my family in 1960 and it has always been my objective to build on it.
- The site is near my family home where my aging parents reside.
- Rezoning this land from agriculture to residential, will ensure my family remains in the area they were born, grew up, and currently live

Chief Executive's Response:

Under the 2009-15 Dundalk Development Plan the subject lands were zoned 'Agriculture'.

In re-defining the development boundary of Dundalk it was considered that the previously zoned agricultural lands should be omitted so as to clearly define the urban boundary of Dundalk.

There is a legacy of excess residential zoning in Dundalk. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. The zoning of lands for Community facilities must also be in the appropriate locations and promote sustainable travel patterns.

National and regional policy requires future settlement growth to be focused on consolidation and compact growth. Development on the edge of settlements would facilitate the creation of suburban car dependant sprawl which is considered to be an unsustainable pattern of development, particularly when there are alternatives available on other more suitably located undeveloped lands.

Having regard to the location of the lands which are detached from the urban settlement boundary it is considered the development of the lands would not follow the sequential pattern of development and would result in the creation of suburban sprawl that is inconsistent with national and regional policy.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR0759
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Submitted By	Tom Muckian
Theme (s):	Rezone Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Request rezoning from Residential to Community Use (G1).

In Support:

- Site was previously used as cash and carry and builder's yard.
- Any proposed residential development of these lands would give rise to serious concerns comprising, Flood risk, traffic and pedestrian safety, overlooking, impact on residential amenity, impact on archaeology and cultural heritage, impact on environmental and ecological considerations.
- Site located with flood zone, planning permission was refused for flood risk and drainage reasons (14/208).
- Development will depend on single combined entrance for vehicles and pedestrians, not clear if access can be upgraded and there are already too dangerous intersections along then Castle Road.
- High rise development will result in overlooking of adjoining properties
- Sites work will impact upon the amenity of the adjoining properties
- Area is rich in archaeological material any development should be sympathetic to historic nature of site.
- Franciscan Tower is known for bat nesting.

Chief Executive's Response:

There is a current application for the redevelopment of the subject lands for a residential use (planning ref. 20/661) that was on a further information request at the time of writing. This application is being assessed under the current Development Plan for Dundalk. The subject lands are located in the urban core of Dundalk to the rear of residential properties. National and Regional policy supports the consolidation of development in close proximity to town centres and the redevelopment of under-utilised lands. It is also a national policy objective to deliver 30% of new homes on infill and brownfield sites within

the built up footprints of settlements.

It is acknowledged that any redevelopment proposals must be sensitive to the area in which it is located and a balance must be achieved in the implementation of national and regional policy whilst also respecting the local environment. The Development Management Guidelines in Chapter 13 of the Draft Plan sets out detailed standards and criteria against which planning applications will be assessed.

Taking the foregoing into account it is considered that in the interests of supporting the implementation of national and regional policy regarding infill and brownfield development and the redevelopment of under-utilised lands that the A1 'Existing Residential' zoning attached to the subject lands should be retained. Any concerns regarding redevelopment proposals will be considered in greater detail in the assessment of planning applications through the Development Management process.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR0783

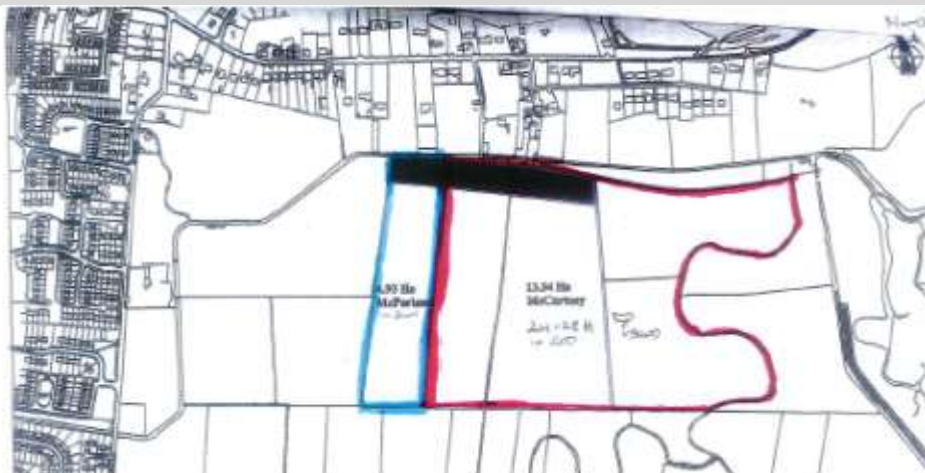
Submitted By

McParland Bros (Ire) Ltd and Pat and Kevin McCartney

Theme (s):

Rezone Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Request the rezoning of lands (4.93ha and 13.54ha) at Point / Red Barns Road for Residential Development and part for public park.

In Support:

- Vehicular access is available from Point Road access to the site would also be available from Red Barns/Shore Road, subject to agreement with landowners.
- Site is surrounded by existing dwellings or residentially zoned land. The area around Rockview Farm has also been zoned residential with the sea edge zoned as a Strategic Recreational Area.
- To the west, along the Red Barns Road there are designated cycleways, improvements to footpaths and lighting have been undertaken and a roundabout has been provided.
- Lands can be serviced by public foul, surface water and portable water.
- The Point Road, Red Barns and Blackrock roads have been the focus for residential development due to their attractive location and proximity to employment opportunities and other facilities.
- There is good connectivity in terms of cycling, walking and private car, this is in keeping with government guidance.
- Projected population figures for 2020 are provided, it is stated that only 100ha of serviced undeveloped residential land is available, on the basis of 30units/ha this would accommodate c.8000 persons, this is well below then projected population figures
- The new development plan should zone sufficient land
- A zoning strategy similar to the one utilized at Rockview farm is proposed in this location.
- The 1.94ha on the northern part of the site could be made available for development of a public park.

Chief Executive's Response:

The designation of Dundalk as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in Louth in this Development Plan.

This Plan strongly supports the growth of Dundalk in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre however this growth must take place in an orderly and sequential manner.

The subject lands are identified as 'Strategic Recreation' in the 2009-2015 Dundalk Plan. The OPW CFRAMS Flood Maps in the Draft Development Plan indicate that the subject lands are located in Flood Zone A. A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan. Residential Development is classed as a 'Highly Vulnerable development' in 'The Planning System and Flood Risk Management Guidelines' and would not be considered a suitable land use on undeveloped lands located in Flood Zone A, particularly when there are lands with a lower risk of flooding available for development in the town.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR0784
Submitted By	Lorraine Scully
Theme (s):	Rezone Dundalk
Map showing lands subject to Submission:	



Figure 2 – Proposed Land Use Zoning Map (subject lands outlined in black)

Summary of Submission:

Request rezoning from Residential (1ha) to Community Use (G1).

In Support:

Site was previously used as cash and carry and builder's yard. Current application on site (planning reference 20/661), further information has been sought regarding same. Outline of Permitted Use and Uses Open for Consideration in the draft Plan, is provided.

Proximity to Community Facilities

Rezoning of lands could facilitate the expansion of additional facilities for Realt na Mara National School or serve the local community in terms of a sport or recreation facilities.

Flooding

Lands are located within Flood Zone A , as per planning reference 20/661 the planning authority are not satisfied that development of the site will not give rise to further flood risk. A precautionary approach should be applied rezoning to a more appropriate recreational use would be in accordance with the Planning System and Flood Risk Guidelines (2009).

Drainage Considerations

The local foul and surface water network on Castle Road is constrained which would negate against the construction of a large residential development, two of the refusal reasons relating to planning ref 14/208 pertained to drainage issues.

Traffic Considerations

Safe means of vehicular access to the subject lands from Castle Road is constrained, the entrance is a shared right of way. Significant residential development on this site would be a traffic hazard. Community facilities would offer a lower level of activity and access can be primarily from the existing Realt na Mara school on Mill Street

Protection of Residential Amenities

Residential amenity should be protected, the development proposed under 20/661 is inappropriate.

Environmental Considerations

Site is located within an ACA and adjoining a national monument, bats are known to roost in tower.

Chief Executive's Response:

There is a current application for the redevelopment of the subject lands for a residential use (planning ref. 20/661) that was on a further information request at the time of writing. This application is being assessed under the current Development Plan for Dundalk.

The subject lands are located in the urban core of Dundalk to the rear of residential properties. National and Regional policy supports the consolidation of development in close proximity to town centres and the redevelopment of under-utilised lands. It is also a national policy objective to deliver 30% of new homes on infill and brownfield sites within the built up footprints of settlements.

It is acknowledged that any redevelopment proposals must be sensitive to the area in which it is located and a balance must be achieved in the implementation of national and regional policy whilst also respecting the local environment.

The Development Management Guidelines in Chapter 13 of the Draft Plan sets out detailed standards and criteria against which planning applications will be assessed.

Taking the foregoing into account it is considered that in the interests of supporting the implementation of national and regional policy regarding infill and brownfield development and the redevelopment of under-utilised lands that the A1 'Existing Residential' zoning attached to the subject lands should be retained. Any concerns regarding redevelopment proposals will be considered in greater detail in the assessment of planning applications through the Development Management process.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR799
Submitted By	Colin Fee Townparks Retail Ltd.
Theme (s):	Rezone
Map showing lands subject to Submission:	



Summary of Submission:

Request rezoning of existing commercial site along the Castletown Road from residential to neighbourhood centre/ commercial.

In Support:

- Townparks Retail Limited operate and run a number of convenience stores and service stations in Dundalk (4no. listed).
- The Centra/ Maxol site on the Castletown Road, is the only service station to service vehicles on the N53 artery leaving Dundalk for Motorway, Monaghan, Castleblayney and Derry.
- The site is the main commercial hub on the Castletown Road, there are in excess of 9000 people living in houses with a 15 minute walk from the site and also 2no. schools.
- There site provides essential life services such as medicinal, post office, social welfare, foodstuffs, ESB/Gas top up facilities and recycling.
- There site is currently incorrectly designated as residential.

Chief Executive's Response:

It is acknowledged that the subject lands includes an established filling station and associated retail outlet, post office, take away, and pharmacy. Given the current uses on the site it is considered that a B2 'Neighbourhood Centre' zoning is appropriate for this site.

Chief Executive's Recommendation:

Change zoning of the subject lands and adjacent commercial premises from A1 Existing Residential to B2 Neighbourhood Centre.

Submission No:	LCDP DR833
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Submitted By	EHP Services on behalf of Donal Carroll
Theme (s):	Rezone - Dundalk

Map showing lands subject to Submission:



Summary of Submission:

Request that a narrow strip of land is rezoned from G2 Institutional Lands to A2 Residential New.

In Support:

- Site comprises half an existing agricultural lane off Rock Road Blackrock, client owns residentially zoned agricultural lands at the rear.
- There is an anomaly – two sides of the same access under one ownership has different zonings arising from Ordnance Survey Maps.
- Original entrance is undergoing upgrade as per planning reference 19/921.
- Rezoning will avoid any complications should an application for lands to the north ever be submitted.
- The strip of land has never formed part of school property and is never likely to.
- Proposed zoning will have no impact on the draft Louth CDP's policies, objectives or strategic vision.
- Policy Objective CS 10 is noted in relation to the preparation of a LAP for Dundalk.

Chief Executive's Response:

The Draft Plan includes a provision for uses not listed in a zoning category to be considered on their merits taking account of the compatibility of the use with surrounding land uses and the proper planning and development of the area (see section 13.19.2.3 of the Draft Plan). The current zonings do not preclude the provision of an access at this location. Taking this into account it is not considered necessary to change the land use zoning as requested.

Chief Executive's Recommendation:

No Change



Section 2c: Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Ardee

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No.**LCDP DR018****Submitted by:**Ian Lawlor on behalf of Kingsgate Property
Development Limited**Theme (s):**

Support Zone Ardee

Map showing lands subject to Submission:**Summary of Submission:**

The subject lands are located in the centre of Ardee accessed from the Drogheda Road. Will actively pursue planning permission once the lands are appropriately zoned. The site is ideally located in close proximity to the centre and would be a great opportunity to provide much need accommodation on one of the main access routes to the town centre.

Chief Executive's Response:

The development of the subject lands would facilitate brownfield/infill development in proximity to the town centre and would support the implementation of the principles of sequential, compact and sustainable growth.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR021
Submitted by:	Doherty Design Services
Theme (s):	Rezone Ardee
Map showing lands subject to Submission:	



Summary of Submission:

Lands should be re-zoned from Strategic Reserve to Residential New (A2)

In support:

- Rockfield housing estate extended along an imaginary line showing the N2 National Road, passing to the West of the town , this is no longer the case,
- Owners have not developed lands zoned Residential New in the Ardee LAP 2010-2016, maybe they do not intend to develop their lands and this restricts others.
- Site is fully serviceable with sewers, surface water drains, water mains and public utilities and is adjacent to a road network.
- Lands are within a short walk to schools, church, playgrounds and retail facilities.

Chief Executive's Response:

Ardee is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Ardee to no more than 30% of the 2016 population. In order to be consistent with national policy the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy.

There is a legacy of excess residential lands in Ardee which has resulted in a requirement to include lands in Strategic Reserve. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out.

This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Ardee and the quantum of lands required to meet these demands.

The Infrastructure Assessment identified that there are no water services to serve the lands and there are no proposals by Irish Water to bring services to this part of the town. In addition there are other more suitably located lands within the town available for residential development that would deliver more consolidated, compact development rather than a pattern of sprawl due to development taking place at the edge of the settlement centre.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy.

The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation

No change

Submission No.

LCDP DR071

Submitted by:

Genesis Planning Consultants on behalf of
Hugh McMahon

Theme (s):

Support Zoning Ardee

Map showing lands subject to Submission:



Summary of Submission:

It is requested that the subject lands remain within the settlement envelope of Ardee and zoned as New Residential (A2).

Chief Executive's Response:

The lands remain within the development boundary of Ardee and zoned 'New Residential'. On foot of the Submission from the OPR and EMRA, the lands are now identified as Phase 2 lands.

Chief Executive's Recommendation

Mapping Change – Lands identified as Phase 2.

Submission No.	LCDP DR078
Submitted by:	Hanley Taite Design Partnership on behalf of Michael Mc Coy
Theme (s):	Rezone Ardee
Map showing lands subject to Submission:	



Summary of Submission:

Lands which are located to the west of the Bridge on Bridge Street, Ardee should be rezoned from G1 Community Facilities to B1 Town/ Village Centre.

In support of the request:

1. A detailed history of the site and the surrounding area, along with analysis of surrounding uses and a photographic survey of the site is provided:
2. Potential uses of the site are outlined they include a restaurant, guest house, offices, retail and residential as well as, a public path along the river Dee.
3. A masterplan has been submitted along with a justification for same in relation to the key points outlined in the Issues Paper. The master plan incorporates *inter alia* a public path along the River Dee, playground, connections and public plaza.
4. It is stated that the site could be developed in conjunction with the adjoining Mill site, thereby providing a connection between the town and the adjoining Moorehall Lodge Nursing Home.

Chief Executive's Response:

The lands which are the subject of the submission currently front onto Hale Street and are located immediately adjoining the southern-most extent of town centre zoned lands. There is evidence in the area of neglect and vacancy in terms of existing buildings which detract somewhat from the surrounding wider area which is rich in terms of its built heritage, including Protected Structures and National Monuments. The subject site is a brownfield site, wherein there are existing buildings located.

Intrinsic to national and regional policy is securing compact and sustainable growth. The preferred approach for compact development is one which focuses on reusing previously developed 'brownfield' lands coupled with the development of infill sites and buildings. To this end, the NPF requires at least 30% delivery of all new homes in settlements such as Ardee to be within the existing built footprint (NPO 3(c)).

The Core Strategy of the Draft Plan (CS2) seeks to achieve this compact growth by developing *inter alia* brownfield sites and redeveloping underutilised land in preference to greenfield sites. The growth strategy for the county is one which supports the Self-Sustaining Growth Towns of Ardee, which is a regionally important local driver providing a moderate level of jobs and services for the resident population and surrounding catchments. Growth in Ardee will be balanced and sustainable and will include for brownfield and infill development.

As part of the strategy of promoting town centre renewal, the Draft Plan will support and facilitate high quality development that results in the development of vacant and underutilised lands that will improve the vibrancy of the town centre and create a more compact settlement.

The Draft Plan supports the creation of sustainable communities throughout the County by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas, promoting healthy living by encouraging compact growth and the development of brownfield/infill sites in preference to edge of centre Greenfield sites and where walking and cycling is prioritised (HOU 10). Further, the Council also acknowledges that as part of the strategy of consolidation and compact growth, that opportunities for redevelopment of appropriately located brownfield/infill sites in central areas of towns, such as Ardee, may be suitable for accommodation for older people.

Having regard to the above, the proposal to rezone the lands from Community Facilities to Town Centre at this location is considered to be acceptable and appropriate as it will contribute to the consolidation of the town centre, support compact growth, develop brownfield and underutilised lands, improve the vibrancy of the area and contribute to sustainable communities. However, it is considered apt that a Spot Objective be included on the subject lands requiring the provision of a Masterplan. A Masterplan provides a vision and conceptual guide for the development of a strategically located area of land. It ensures there is a framework in place setting out how the area will be developed. It is appropriate at this location as the larger area (outlined in Red and Blue on the submission) is a substantial brownfield site with potential challenges including environmental constraints such as flooding and archaeology. A conceptual design and layout can illustrate opportunities to provide for, improve and strengthen public open space, pedestrian amenity walkways, permeability and connectivity to service the immediate and wider area in addition to the provision and interaction of a wide range of potential uses.

In conclusion, it is considered appropriate that the lands be rezoned from Community Facilities to Town or Village Centre.

Chief Executive's Recommendation

Recommend that the lands in question be rezoned from Community Facilities (G1) to Town or Village Centre (B1) and include a Spot Objective for the provision of a Masterplan for the development of the lands.

Submission No.	LCDP DR093
Submitted by:	Vincent Matthews
Theme (s):	Rezone Ardee
Map showing lands subject to Submission:	



Summary of Submission:

Rezone lands at Drogheda Road, Ardee from Rural Policy Zone 2 to A1 Existing Residential.

In support:

1. The Plan supports 'New Homes in Small Villages' thereby providing serviced sites in towns and villages, the subject lands would be suitable for this purpose i.e. low density houses on single sites.
2. Lands are within speed limits, and are serviced by footpaths thereby providing for walking and cycling, mitigating against climate change and protecting the environment. Their development would allow the creation of critical mass and the establishment of a catchment for local business.

Chief Executive's Response:

Ardee is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Ardee to no more than 30% of the 2016 population. In order to be consistent with national policy, the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy. Table 2.14 of the Draft Plan has been amended on foot of submissions from the OPR and EMRA requiring that the population growth of Ardee (and Dunleer), in line with national policy, does not exceed 30% of the 2016 population. This has resulted in a reduction in Ardee's projected population growth from 7.9% to 6.8% (of the projected population growth in the County) and a corresponding reduction in the 2027 Projected Population from 6,583 to 6,357. This amendment is reflected in a revised Core Strategy Table 2.14.

There is a legacy of excess residential lands in Ardee which has resulted in a requirement to include lands in Strategic Reserve. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Ardee and the quantum of lands required to meet these demands.

These lands which are the subject of the submission lie south of and outside of the development boundary of Ardee while lands bordering the site to the north and within the development boundary are identified as Strategic Reserve. In addition there are other more suitably located lands within the town available for residential development that would deliver more consolidated, compact development rather than a pattern of sprawl and further elongation of the settlement, due to development taking place beyond the edge of the settlement centre as proposed.

In conclusion, the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. 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 therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR126
Submitted by:	Frank Lynch
Theme (s):	Re-zoning
Map showing lands subject to Submission:	



Summary of Submission:

Subject lands (2.5ha) are located at Mullameelan, Ardee the submission requests that they are re-zoned to A2 Residential New, in support it is stated:

- Lands are serviced and serviceable;
- Directly accessible from existing roads infrastructure;
- Sequentially the next parcel of land available; and
- Range of amenities within 1km.

The submission also states that the NPF encourages urban development on serviced sites and brownfield/ infill development, the subject lands are serviced/serviceable and continuous to Ardee's boundary. Ardee is a Level 2 settlement in the draft Louth CDP 2021-2027, development of the site (15/16 units) would allow Ardee to grow in a phased manner. In terms of the core strategy small scale development can aid balance growth. Rezoning of the site would allow development in serviced areas rather than one off houses.

Chief Executive's Response:

Ardee is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Ardee to no more than 30% of the 2016 population. In order to be consistent with national policy, the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy. Table 2.14 of the Draft Plan has been amended on foot of submissions from the OPR and EMRA requiring that the population growth of Ardee (and Dunleer), in line with national policy, does not exceed 30% of the 2016 population. This has resulted in a reduction in Ardee's projected population growth from 7.9% to 6.8% (of the projected population growth in the County) and a corresponding reduction in the 2027 Projected Population from 6,583 to 6,357. This amendment is reflected in a revised Core Strategy Table 2.14.

There is a legacy of excess residential lands in Ardee which has resulted in a requirement to include lands in Strategic Reserve. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Ardee and the quantum of lands required to meet these demands.

These lands which are the subject of the submission lie south-west of and outside of the development boundary of Ardee while lands located to the north of this site and within the development boundary are zoned Strategic Reserve. The subject lands are vulnerable to fluvial flooding and are in Flood Zones A and B wherein the primary provision of residential development is not compatible. In addition, there are other more suitably located lands within the town available for residential development that would deliver more consolidated, compact development rather than a pattern of sprawl and further elongation of the settlement, due to development taking place at the edge of the settlement centre as proposed.

In conclusion, the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. 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 therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR0173
Submitted By	Philomena Matthews
Theme (s):	Rezone Ardee
Map showing lands subject to Submission:	



Summary of Submission:

Request Rezoning of lands from Rural Policy Zone 2 to Residential New

In support:

The Draft Louth CDP supports the document 'New homes in Towns and Villages', it is proposed that lands are used for this purpose. Lands are zoned agricultural but are within the speed limits of the town. This would provide for sustainable residential communities, increase critical mass, reduce dependence on cars, reduce carbon footprint and protect environment.

Chief Executive's Response:

Ardee is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Ardee to no more than 30% of the 2016 population. In order to be consistent with national policy, the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy. Table 2.14 of the Draft Plan has been amended on foot of submissions from the OPR and EMRA requiring that the population growth of Ardee (and Dunleer), in line with national policy, does not exceed 30% of the 2016 population.

This has resulted in a reduction in Ardee's projected population growth from 7.9% to 6.8% (of the projected population growth in the County) and a corresponding reduction in the 2027 Projected Population from 6,583 to 6,357. This amendment is reflected in a revised Core Strategy Table 2.14.

There is a legacy of excess residential lands in Ardee which has resulted in a requirement to include lands in Strategic Reserve. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Ardee and the quantum of lands required to meet these demands.

Lands which are the subject of this submission lie south of and outside of the development boundary of Ardee while lands bordering the site to the north and within the development boundary are identified as Strategic Reserve.

Additionally, there are other more suitably located lands within the town available for residential development that would deliver more consolidated, compact development rather than a pattern of sprawl and further elongation of the settlement, due to development taking place at the edge of the settlement centre as proposed.

In conclusion, the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. 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 therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR0210
Submitted By	Mc Gill Planning on behalf of Arabtec Capital Unlimited.
Theme (s):	Rezone Ardee, Core Strategy, Flooding
Map showing lands subject to Submission:	



Figure 2: Site B (Heathergate)

Summary of Submission:

Site A of 2.6HA John Street Ardee, zoned as 'General Employment' in the draft Louth CDP 2021-2027.

Site B: Located to the SW of the town and zoned as Strategic reserve (L1) in the draft Louth CDP 2021-2027. Submission requests that both sites are zoned Residential New (RN) in the forthcoming Development Plan.

In Support:

With regard to Site A it is stated that the site may no longer be suitable for employment use:

- The site is within short walking distance of the Main Street (c.350m to the east);
- It is directly opposite Ardee Community School and a medical centre;
- There is a pharmacy close-by and a number of other retail units in the vicinity;
- The location would be ideal for a high quality affordable residential development and would make best possible use of land so close to the town centre; and
- The site would be ideally suited to residential development and would be in accordance with the National Planning Framework (NPF) which promotes compact urban residential growth at such locations.

With regard to Site B it is stated that:

- The Heathergate the adjoining residential development built by client and they provided (at their own cost) the significant water and sewerage services to a size and capacity that would Site B.

Submission is accompanied by reports from Denis Williams Engineers confirming that both sites are fully serviceable. Thus zoning of these lands for residential development is preferable to the zoning of other greenfield lands in the LAP area which would require significant investment.

It is considered that both sites ought to be zoned Residential New having regard to the following:

1. The location of the subject lands within walking distance of the town centre,
2. The proximity of the subject lands Site A to the school opposite and to other community services such as the health centre, pharmacy and nearby shops,
3. Map and planning history of Ardee provided. The fact that the majority of residentially zoned lands have now got the benefit of planning permission in the last 12 months and some of the development is under construction,
4. The remaining residentially zoned lands are peripheral and remote from the town centre and have not made any effort to secure planning permission or deliver residential accommodation,
5. National policy in respect of “use it or lose it” for residentially zoned lands to ensure the adequate delivery of residential accommodation.
6. The National Planning Framework policy of delivering accommodation within urban centres,
7. The fact that Site B was zoned Strategic Reserve in the previous Development Plan indicated the Council’s support for the future development of same in the future plans.
8. The demand for affordable accommodation in Ardee,
9. Some of the lands currently zoned residential in the Draft Development Plan are located in Flood Zone A and should therefore be avoided in line with Government Guidelines having regard to the availability of alternative lands suitable for residential accommodation such as our client’s lands. No justification test for these lands has been carried out. Furthermore they are in a peripheral location and is not fundamental to the expansion of the town of Ardee. Our client’s lands are located closer and are fully serviceable by all utilities and are not liable to flood.
10. The de-zoning of these flood lands and their replacement with our client’s lands would not increase the quantum of lands zoned residential in the Ardee area and would therefore comply with the core strategy.

Chief Executive’s Response:

Albeit that the submission is concerned with two disparate sites (Site A and Site B) with differing zoning objectives, namely ‘General Employment’ and ‘Strategic Reserve’, and at difference locations, as both are seeking rezoning to ‘Residential New’, it is considered appropriate to deal with the responses collectively.

Ardee is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Ardee to no more than 30% of the 2016 population. In order to be consistent with national policy, the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy. Table 2.14 of the Draft Plan has been amended on foot of submissions from the OPR and EMRA requiring that the population growth of Ardee (and Dunleer), in line with national policy, does not exceed 30% of the 2016 population. This has resulted in a reduction in Ardee's projected population growth from 7.9% to 6.8% (of the projected population growth in the County) and a corresponding reduction in the 2027 Projected Population from 6,583 to 6,357. This amendment is reflected in a revised Core Strategy Table 2.14.

There is a legacy of excess residential lands in Ardee which has resulted in a requirement to include lands in Strategic Reserve. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

As part of this evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Ardee and the quantum of lands required to meet these demands.

The Infrastructure Assessment was conducted in relation to Site B (Strategic Reserve) and identified that there are no water services to serve the lands and there are no proposals by Irish Water to bring services to this part of the town. In addition there are other more suitably located lands within the town available for residential development that would deliver more consolidated, compact development rather than a pattern of sprawl due to development taking place at the edge of the settlement centre.

In addition to the reasons as outlined above, the lands relating to Site A sit within and are surrounded by existing employment generating uses. In fact, industrial lands to the west of the town (Curraghbeg Industrial Estate) which heretofore were located outside of Ardee's development boundary were during the preparation of the Draft Plan incorporated into the development boundary to strengthen and reinforce the employment generating activities at this location. Therefore, and notwithstanding the existing historic and limited small housing enclave with road frontage onto John Street, it is not considered appropriate or desirable to introduce and zone for in-depth residential development within the larger parcel of employment lands at this location.

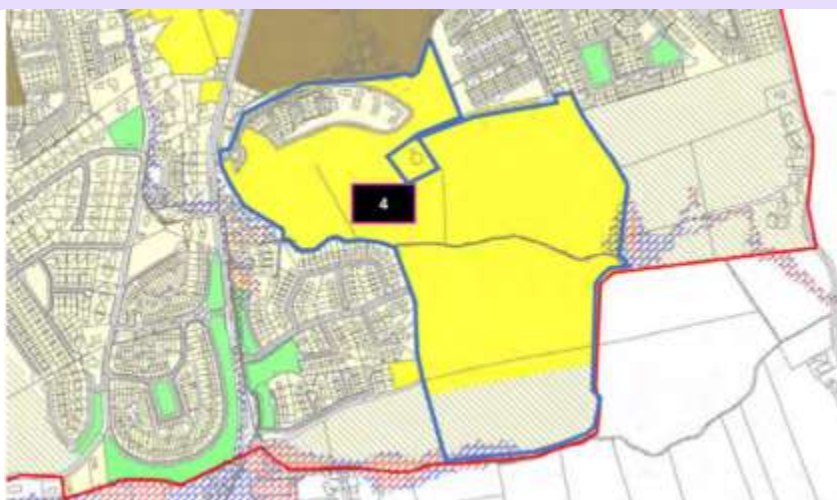
In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. The retention of lands for employment generating uses as a cohesive land parcel at this location is considered preferential. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR0365
Submitted By	John Spain Associates on behalf of the Ardee Partnership.
Theme (s):	Support Zoning Ardee, Rezone Lands

Map showing lands subject to Submission:



Summary of Submission:

Client is supportive of lands in their ownership zoned as New Residential (A2), and requests that the Strategic Reserve (L1) in the draft Louth CDP 2021-2027 be rezoned for New Residential.

Introduction

Our client is currently on site at Bridgegate, (158 no. residential units, crèche, community building and open space). Pre-Application Consultation Request with An Bord Pleanála, and tripartite meeting held on 4th December on adjoining lands (278 residential units, crèche, community centre, public open space on 12.99ha).

Chapter 2 Core and Settlement Strategy

Ardee is identified as a 'Self-Sustaining Growth Town' in the draft CDP as per the Settlement Hierarchy outlined in the RSES's. The RSES identifies infrastructure improvements at the N52 Ardee bypass and the N2 Ardee to Castleblayney which will enable Ardee to accommodate appropriate population and housing growth in the next Plan period and beyond.

The strategic objectives set out in 2.4.1 of the draft Core Strategy and Louth's growth strategy in relation to Ardee and Dunleer's (section 2.4.4) are listed. It is stated that the development of the subject lands will align with Core Strategy and Growth Strategy Objectives.

Population Growth

Table 2.9 of the draft CDP sets out the population projections and distribution by settlement. The table sets out a projected population of 6,583 (increase of 1,655) in Ardee by 2027. The client is supportive of the projected growth allocated to Ardee

Housing Growth

The Core Strategy allocates 584 new dwellings to Ardee within the next Plan period 2021-2027 to accommodate the projected 1,655 increase in population.

The lands at Bridgegate, Ardee are located within the existing settlement envelope and are well placed to deliver housing in compliance with national objectives (30% within existing built up footprints). The client is committed to developing the remaining lands zoned 'A2 New Residential'. Extant permissions and proposed development at Bridgegate aligns with CS11 and CS13.

Settlement Hierarchy

The client is supportive of the proposed upgrade of roads infrastructure and seeks to assist with the removal of traffic from the town centre by facilitating a route through the Bridgegate lands under ownership to link to the lands to the east.

Client is supportive of SS37 and seeks to create a sustainable community at Bridgegate.

Client also supportive of SS 42 and seeks to address this through the provision of a link road through the lands as. This is included with a SHD which is a Pre –Application stage with An Bord Pleanála.

Chapter 3 Housing Strategy

Lands under ownership of our client are at an edge of settlement location within Ardee and therefore a recommended density of 25 units per hectare minimum is considered appropriate.

Chapter 13 Zoning.

Client is supportive of lands in their ownership zoned as New Residential (A2) and Strategic Reserve (L1) in the draft Louth CDP 2021-2027. Client is fully committed to delivery of lands. It is noted that Spot Objective 4 is included on the clients lands Construction of a public park is underway on Phases 1-3 of Bridgegate and the proposed SHD on adjoining lands will include high landscaped open space.

Proposed Strategic Housing Development.

As per above formal Pre Planning app submitted to An Bord Pleanála for 278no. units etc. if permitted there will be a 405 residential units across total phases at Bridgegate if granted, delivering vital elements of infrastructure and services which will contribute to the sustainable growth of Ardee. The submission seeks to extend the 'New Residential' into the 'Strategic Reserve' at this location.

Appendix 2 Infrastructure Assessment and Land Use Evaluation.

Within the Tiered Assessment the lands were considered to be 'Tier 1', it is also considered that the lands are within the built up footprint of Ardee, contiguous to existing developed lands and spatially sequential. Our client is broadly supportive of the assessment undertaken by the Planning Authority however it is considered that the subject lands merit a 'green light' in respect of Roads and Water. Water supply at Mulladrillen Hill has been upgraded and proposed SHD will facilitate future road connections to the east. Furthermore, a review of residentially zoned lands in the town shows a shortfall.

Chief Executive's Response:

Ardee is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Ardee to no more than 30% of the 2016 population. In order to be consistent with national policy, the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy. Table 2.14 of the Draft Plan has been amended on foot of submissions from the OPR and EMRA requiring that the population growth of Ardee (and Dunleer), in line with national policy, does not exceed 30% of the 2016 population. This has resulted in a reduction in Ardee's projected population growth from 7.9% to 6.8% (of the projected population growth in the County) and a corresponding reduction in the 2027 Projected Population from 6,583 to 6,357. This amendment is reflected in a revised Core Strategy Table 2.14.

There is a legacy of excess residential lands in Ardee which has resulted in a requirement to include lands in Strategic Reserve. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

The rezoning of lands from Strategic Reserve to New Residential would not align with the housing demand for Ardee as set out in the Core Strategy. In addition there are other more suitably located lands within the town available for residential development that would deliver more consolidated, compact development.

As part of the evidence based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. In addition to these issues, consideration must also be given to the household demand associated with the projected population growth in Ardee and the quantum of lands required to meet these demands. In relation to the lands identified as 'New residential' north of and adjoining the subject lands, the Infrastructure Assessment identified that there are potential infrastructural issues relating to roads and water services which may require upgrade during the life of the Plan.

This was based on information received from the Roads Section and Irish Water.

In conclusion, the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. There are adequate lands zoned for 'New Residential' development in Ardee without necessitating rezoning lands identified as 'Strategic Reserve'. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR0498

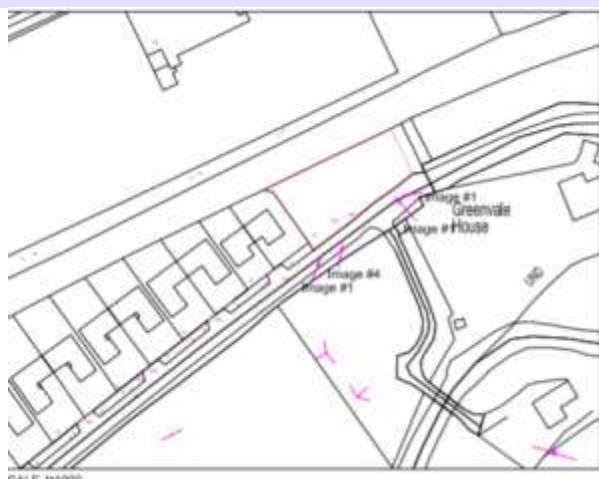
Submitted By

Finn Design on behalf of Seamus Rodgers.

Theme (s):

Rezoning Ardee

Map showing lands subject to Submission:



Summary of Submission:

Request to re-zone from Open Space (H1) to Existing Residential (A1).

In support:

- Lands are vacant, overgrown and used as a pedestrian link from Patrick Tierney Street to the public walkway;
- Open Space zoning is not appropriate as it has no form, structure and the space is unusable;
- Lands are situated within walking distance of local amenities;
- They are of sufficient size etc. to accommodate residential development and the remaining land could be utilized to formalise walkway; and
- This will improve the local area by removing an unmaintained area and providing a walk way.

Chief Executive's Response:

The lands which are the subject of the submission are located to the east of an existing housing development comprising 13 single storey semi-detached dwelling houses granted planning permission under Reg. Ref. No. 639/90. The subject lands were identified as the Open Space to serve the housing development. Therefore, to rezone the lands from open space to residential would contravene the conditions of the planning permission.

Louth County Council was recently successful in securing funding for Ardee 2040 under the Rural Regeneration and Development Fund (RRDF) arising from the NDP, to support the implementation of regional and local authority development plans. Ardee 2040 is wide ranging in scope and includes *inter alia* the provision of walkways, amenity areas, recreational facilities etc. Included is a proposal for pedestrian access from the Ardee Treatment Works in a westerly direction providing connectivity to the south of the town and north to the former railway line. The current pedestrian walkway which exists to the east of the subject lands is included in this proposal.

With RRDF funding, LCC will engage consultants to prepare a study, consider various options and bring the preferred option to planning. It is considered that to rezone the lands from open space to residential use would be premature pending the outcome of the aforementioned Study and could potentially prejudice development at this location.

In conclusion the lands are designated open space associated with the adjoining residential development and to permit residential development thereon would contravene the conditions of the planning permission. The lands also form part of a wider study being undertaken as part of Ardee 2040 project, funded under the RRDF and any change to the zoning would be premature pending the outcome of this study.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR00578
Submitted By	Finn Design Partnership on behalf of Seamus Rodgers
Theme (s):	Support Zoning Ardee
Map showing lands subject to Submission:	



Summary of Submission:

Support zoning of land outlined in yellow as New Residential (A2).

- Lands are currently agricultural, have frontage along the R170 and the link road to the N33;
- Castleguard Manor is to the north and Dawson Demesne to the west;
- Access to the land is from the R170 and is within the 50km/hr speed limit;
- The zoning is supported and the lands provide an excellent opportunity to deliver, attractive sustainable residential development;
- No phasing is acknowledged and supported;
- As per a feasibility study a minimum density of 25 units/ha is considered acceptable;
- Lands are fully serviced with foul and storm water drainage; and
- The upgrade to the waste water treatment plant ensures capacity.

Chief Executive's Response:

The development of the subject lands which is surrounded by existing residential and employment generating activities would facilitate infill development at this location and would support the implementation of the principles of sequential, compact and sustainable growth.

Chief Executive's Recommendation:

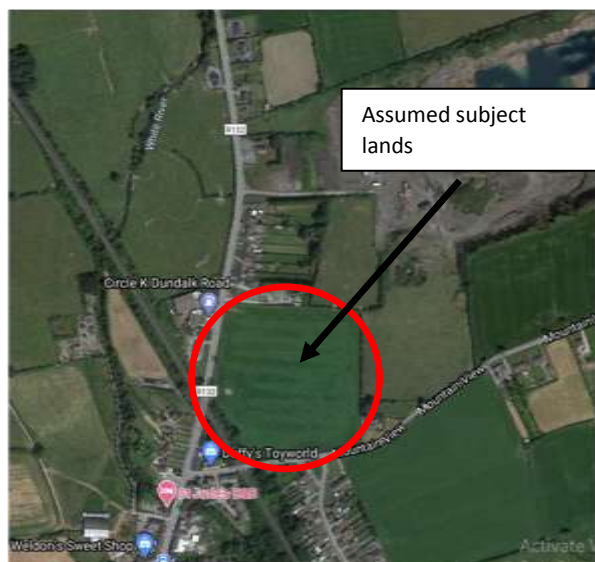
No Change



Section 2d: Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Dunleer

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No:	LCDP DR058
Submitted By	Matthews Family c/o Eugene Matthews
Theme (s):	Rezone Mountaintown
Map showing lands subject to Submission:	



Summary of Submission:

That the land division in the townland of Mountaintown on the east side of the R132 opposite Circle K (Darby's) filling station is designated as development land.

Chief Executive's Response:

Dunleer is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Dunleer to no more than 30% of the 2016 population. In order to be consistent with national policy the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy.

No map was included with the submission however it is assumed the lands being referred to, are those set out in the map above. These lands are outside of the development boundary of Dunleer. Whilst they are adjacent to the settlement boundary there is currently an excess of available residentially zoned land in Dunleer, therefore there is no requirement to identify any additional lands for development.

A Local Area Plan is to be prepared for Dunleer during the lifetime of the County Development Plan. An analysis and evaluation of the requirement for residential lands can be reviewed again during the preparation of the Local Area Plan.

In conclusion, the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made and these lands remain outside the development boundary of Dunleer.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR221

Submitted By

Orla Connor

Theme (s):

Zoning Dunleer

Map showing lands subject to Submission:



Summary of Submission:

Lands (6acres) located at Upper Street Dunleer presently zoned residential should be dezoned.

In support:

- Lands have always been called Motte field because of the medieval Norman Motte which is situated there are other archaeological features i.e. south terrain, ring fort, fulacht fia etc.;
- Environmentally, the site is also very sensitive. The white river flows along its eastern side and is home to a variety of wild life;
- Twenty years ago Muire O'Loaire compiled a plan for the development of Dunleer. This plan recognised the importance and sensitivity of the Motte field. However the plan was ignored and the Councillors compiled their own plan. Controversy followed and amidst all the mayhem the Motte field was zoned residential;
- Since then three applications to construct a housing estate have been refused by Bord Pleanála. There is currently a fourth attempt with Louth Co Council Planning Department; and
- Considering the above circumstances the Motte field should be dezoned.

Chief Executive's Response:

Dunleer is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

An important element of the national growth strategy is securing compact and sustainable growth focusing on the development of brownfield and infill sites and vacant and underutilised lands. As part of national policy in providing such compact, smart and sustainable growth, there is a policy objective (3c) which requires the delivery of at least 30% of all new homes that are targeted in settlements such as Dunleer within their existing built up footprints.

Whilst no map was included with the submission it is assumed the subject lands are those set out in the appended map above. These lands are located within the built up area of Dunleer's development boundary and in very close proximity to the urban core. The area of the new residential lands extend to circa 0.9ha and are surrounded by lands zoned open space extending to an area of circa 12ha.

The Castle Motte which is a Recorded Monument located within the subject lands is also within the identified Zone of Archaeological Potential. The Draft Plan in both narrative and policy objectives seeks to protect and preserve archaeological sites and monuments whilst ensuring that any development adjacent to or in the vicinity of a recorded monument or Zone of Archaeological Potential will not be detrimental to the site or its setting, but rather be designed to protect the monument and its setting.

The rich natural heritage which contributes to the character of Dunleer is acknowledged in the GIS in the Dunleer Local Area Plan where features of interest and potential for Green Infrastructure enhancement are detailed. Of note, the White River acts as a wildlife corridor supporting the movement of species through the town and to the surrounding countryside. Herein, the creation of a linear riverside park (along the White River) and an amenity park, opening the river as a recreational amenity for the public is promoted. Section 6.3.3 of the Dunleer LAP specifically identifies that the zoned new residential lands which are the subject of this submission through their development

The Dunleer LAP envisages that the amenity park in the vicinity of the Castle Motte could be developed in conjunction with a high quality, low density housing development on the residential zoned lands which are the subject of this submission. In this regard a detailed design is required to address a range of issues including *inter alia* a comprehensive approach to the development of the lands and the incorporation and protection of the Motte and its setting.

Notwithstanding the history of planning refusals pertaining to the site, the principle of residential development on the lands has been established through its zoning objective and planning refusals have primarily related to issues regarding design, layout etc.

A Local Area Plan is to be prepared for Dunleer during the lifetime of the County Development Plan. An analysis and evaluation of the requirement for residential lands can

be reviewed again during the preparation of the Local Area Plan.

In conclusion, the policy framework both in the Core Strategy and throughout the Plan seeks to support the implementation of the national and regional policy of compact growth and facilitate the regeneration and redevelopment of town and village centres. Inclusion of the subject lands for residential purposes within the development boundary of Dunleer will contribute to sequential, sustainable and compact growth and transition to a low carbon, climate resilient society. Development of the lands in accordance with the policies of both the Dunleer LAP and the Draft Plan will protect the built and natural heritage of the site in a sensitive manner. It is therefore recommended that no change is made and these lands remain within the development boundary of Dunleer.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR269
Submitted By	Antoinette Matthews
Theme (s):	Rezone Land Core Strategy

Map showing lands subject to Submission:

Fig 1: Location of Subject Lands



Summary of Submission:

The submission relates to a 1.98ha at Trean, Dunleer. In the draft Louth CDP 2021-2027 the subject lands are designated as Rural Policy Zone 2, the submission requests that the lands are included within the settlement boundary of Dunleer and are zoned as New Residential (A1).

In support:

- Dunleer is a Self-Sustaining Growth Town;
- The site is in proximity to the recently expanded Scoil Uí Mhuirí and to Dunleer's largest

employer Glen Dimplex (c.500m) and thus the development of these lands will significantly reduce the demand for car based travel;

- Table 2.14 in Chapter 2 of the draft Louth CDP 2021-2027 states that Dunleer requires 345 new residential units by 2027. Assessment of the 4no. sites zoned as Residential New in the draft Louth County Development Plan 2021-2027 was carried out and it was concluded that Sites 3 & 4 (combined area of 8.3ha) are the only viable sites for private housing over the lifetime of the plan. Thus there is limited supply of zoned undeveloped sites in Dunleer;
- Furthermore the NPF advocates the redevelopment of Brownfield sites, the centre of Dunleer has issues relating to flooding. Historically these sites are difficult to deliver. While small pockets/buildings will naturally lend themselves to infill development, it is likely that the target of 109 units can/will be met over the lifetime of this plan;
- The site is serviced with footpaths, access and public lighting; and
- Re-zoning will significantly enhance the local community of Dunleer by providing a small new housing scheme with character that blends in with the existing housing typology in the area.

Chief Executive's Response:

Dunleer is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Dunleer to no more than 30% of the 2016 population. In order to be consistent with national policy the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy. Table 2.14 of the Draft Plan has been amended on foot of submissions from the OPR and EMRA requiring that the population growth of Dunleer (and Ardee), in line with national policy, does not exceed 30% of the 2016 population. This has resulted in a reduction in Dunleer's projected population growth from 4.4% to 2.5% (of the projected population growth in the County) and a corresponding reduction in the 2027 Projected Population from 2,757 to 2,351. This amendment is reflected in a revised Core Strategy Table 2.14.

The map accompanying the submission illustrates that the lands in question are located adjoining but outside of the development boundary to the east of Dunleer. Whilst they are adjacent to the settlement boundary there is currently an excess of available residentially zoned land in Dunleer, and therefore there is no requirement to identify any additional lands for development.

The development strategy for Dunleer town is to continue to support both economic development and residential growth that meets the housing needs of the local population, whilst supporting compact growth, consolidation of the urban core and development of vacant/underutilised lands and brownfield sites, in accordance with national and regional policy. In relation to issues regarding flooding, the Draft Development Plan has been subject to a Strategic Flood Risk Assessment (SFRA) in accordance with 'The Planning System and Flood Risk Management –Guidelines for Planning Authorities' (2009).

A Local Area Plan is to be prepared for Dunleer during the lifetime of the County Development Plan. An analysis and evaluation of the requirement for residential lands can be reviewed again during the preparation of the Local Area Plan.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made and these lands remain outside the development boundary of Dunleer.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR322
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Submitted By	Alice Cunningham
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Theme (s):	Rezone
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Map showing lands subject to Submission:



Summary of Submission:

Rezone lands (3.5acre) along the Ardee Road, Dunleer to residential or commercial

In support:

Development of the site would enable more balanced residential and employment development to the west side of the town, close to schools and existing employment zones, furthermore it would lead to a reduction of traffic in town centre.

Chief Executive's Response:

Dunleer is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan. The town has a strong employment base and future growth will be based on meeting local demand in addition to having a complementary role to the Regional Growth Centres of Drogheda and Dundalk.

As part of the national policy of prioritising growth in higher tier settlements there is a policy objective in the NPF (NPO 9) that restricts the growth of settlements such as Dunleer to no more than 30% of the 2016 population. In order to be consistent with national policy the residential land use zoning has to be aligned with the housing demand as set out in the Core Strategy.

The map submitted with the application clearly indicates that the lands in question are located to the north west of and outside the development boundary of Dunleer. There is currently an excess of available residentially zoned land in Dunleer and therefore there is no requirement to identify any additional lands for development. Further, the lands proposed would result in an extension and elongation of the development boundary which would militate against the provision of consolidated and compact growth.

A Local Area Plan is to be prepared for Dunleer during the lifetime of the County Development Plan. An analysis and evaluation of the requirement for residential lands can be reviewed again during the preparation of the Local Area Plan.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made and these lands remain outside the development boundary of Dunleer.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR387

Submitted By

P Herr & Associates on behalf of Donal Kinsella

Theme (s):

Rezone

Map showing lands subject to Submission:



Summary of Submission:

Request that lands (6.5ha) to the west of the Dunleer are included within the settlement boundary and are zoned as Employment General (E1).

In support:

- Western settlement boundary is an arbitrary line, the motorway would be the natural physical boundary;
- The Spatial Planning and National Roads Guidelines (2012) recognise and highlight the potential adverse impact of allowing development within close proximity of a National Road. Never the less the Guidelines do not apply a strict prohibition policy. Instead, they allow developments to be assessed on a case- by- case basis with mitigation measures adopted where applicable;
- Policy Objectives ENV 6 and 7, relate to environmental noise pollution essentially requiring mitigation measures. These do not apply a strict prohibition policy;
- The stretch of motorway adjacent to the lands is fully lit therefore any additional lighting within 100m would have limited impact;
- It is stated that increased traffic volumes beyond 2050 (figures provided) can be catered for within the existing footprint of the road by utilizing a wide grass median to create a third lane in each direction, this approach has been used in Balbriggan;
- The rationale behind the decision to place the western boundary of the zoned lands 100m to the east of the M1 Motorway is unclear and appears to be based solely on the rigid application of a single policy objective (MOV 47) which has not been applied in the case of other settlement centres within the County e.g. Dundalk and Drogheda;
- The shape of the residual lands will severely hamper their use, they would not be suitable for grazing of livestock; and
- Access along the R169 road frontage will not be permitted as per the TII Design Manual (DN- GEO-03060). The remaining un -zoned lands will be land locked.

Chief Executive's Response:

Dunleer is identified as a Self-Sustaining Growth Town in the settlement hierarchy of the Draft County Development Plan whose growth as a regionally important local driver, shall be complementary to the development of the Regional Growth Centres of Drogheda and Dundalk. Dunleer benefits from convenient access to the motorway which makes the settlement an attractive location for economic development. Whilst it is a relatively small settlement in terms of population, it has a solid employment base and in 2016, there were more jobs than resident workers in Dunleer, resulting in a Jobs: Workforce of 1.10, which was the highest rate recorded in the County and confirmation of the strength of the employment base.

The Draft Plan promotes the economic growth of Dunleer which will allow businesses to cluster with established enterprises thereby strengthening and broadening the employment base and ensuring the town continues to develop in a sustainable platform. This support for economic growth is supported in Policy Objectives EE 47 and EE 48.

The map accompanying the submission identifies the subject lands located east of the M1 motorway and west of and adjoining the existing General Employment zoned lands in the Dunleer development boundary. These General Employment zoned lands are subject to the preparation of a Masterplan, to be agreed with the Planning Authority prior to the lodgement of a planning application (EE 49). Details to be included in the Masterplan relate to conceptual layout, infrastructure details and phasing of the development.

There are currently in excess of 24 ha (61 ac) of lands zoned for General Employment at this location. It is considered that having regard to the existing quantum of undeveloped General Employment lands in Dunleer, including those lands adjoining the subject site, that proposals for incorporation of an additional 6 ha is not warranted, justifiable nor sustainable at this time.

Further Policy MOV 47 specifically restricts development proposals for development within 100mts of the M1 Motorway in all but exceptional circumstances, where the exceptional circumstances are identified as infill and located along an established building line. These exceptional circumstances do not apply in this instance.

These lands are outside of the development boundary of Dunleer. Whilst they are adjacent to the settlement boundary there currently exists very substantial undeveloped and available General Employment zoned land in Dunleer. Further, they fail to meet the exceptional circumstances specified in relation to development within 100mts of the motorway. There is therefore no requirement or need to identify any additional lands for development at this location.

A Local Area Plan is to be prepared for Dunleer during the lifetime of the County Development Plan. An analysis and evaluation of the requirement for general employment lands can be reviewed again during the preparation of the Local Area Plan. In conclusion the quantum of general employment lands identified for development within Dunleer is more than adequate and the zoning of additional lands as proposed is neither appropriate nor necessary.

Chief Executive's Recommendation:

No Change



Section 2e: Chief Executive's Summary, Response and Recommendation on Zoning Submissions – Self-Sustaining Towns

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No.	LCDP DR072
Submitted by:	Paraic McKeivitt on behalf of Carlingford Sailing Club
Theme (s):	Rezone Carlingford
Map showing lands subject to Submission:	



Summary of Submission:

Request to change from H1 Open Space to a mixed use designation, to facilitate community and recreational based activity.

In Support:

- Help overcome mortgage debt and financially viability,
- The club house can continue to be an amenity for the local community,
- Site and membership can broaden membership base of the club to include other activities,
- So changing rooms can be enhanced,
- Briefing, training and meeting room can be available for all users of the club,
- Avoid further erosion of green areas so that they can be retained for on – shore activities, local authority is asked to assist in this regard
- Slipway can be maintained for benefit of all users
- Club can be part of the harbour development

Chief Executive's Response:

The subject lands are zoned H1 'Open Space'. There is an existing club house and associated car park on these lands. Recreational and Sports facilities are identified as being 'Generally Permitted' under this land use zoning in the Draft Development Plan whilst uses such as restaurants and community facilities are 'open for consideration' (see section 13.19.21).

Taking account of the importance of tourism in Carlingford the Council would generally support the provision of infrastructure and amenities that would enhance the attractiveness of the settlement as a tourism destination.

Having regarding to quantum and type of 'Generally Permitted Use's and additional uses for that are 'Open for Consideration' under the H1 Open Space zoning (Chapter 13, Section 13.19.21) it considered that it is the most appropriate zoning for the site.

Furthermore, the site is strategically located within an Area of High Scenic Quality adjacent to the entrance to the Great Eastern Greenway which is a major tourism asset for Carlingford, thus it is considered to appropriate to provide a spot objective for the site.

Chief Executive's Recommendation

Spot Objective 9

Carlingford: To support any proposal for a community or recreational facility on these lands subject to any development being of a high quality architectural design, scale and layout that will support the preservation and enhancement of the environmental quality of this sensitive landscape.

Submission No:	LCDP DR283
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Submitted By	John Woods
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Theme (s):	Rezone Carlingford.
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Map showing lands subject to Submission:

No map attached

Summary of Submission:

Expand Generally Permitted Use or Open for Consideration use to include Camping/Caravan site; or

Rezone from lands from Open Space to Tourism.

In Support:

- In the draft Louth CDP 2021-2027 the definition of allowed development within an "Open Space" has been changed and does not appear to include "camping/caravan site". This use should be reinstated and included within the term "Open Space".
- Alternatively the lands should be re zoned to "Tourism" which does permit this land use.
- The site is a beautiful area of open space, walkways, woodland and lakes.
- Carlingford is the subject of a Fáilte Ireland commissioned Tourism Masterplan for Carlingford which features the lack of amenities such as a proper parking area for touring motor homes or caravans.

Chief Executive's Response:

The subject lands are zoned H1 Open Space in the Draft Louth CDP 2021-2027.

In the Draft Plan Carlingford is identified as an important tourism destination in Louth. The Council therefore supports the provision of additional tourist related infrastructure in appropriate locations and subject to compliance with the relevant planning and environmental criteria.

Given the proximity of the subject lands to the centre of Carlingford a tourism related use may be acceptable subject to the scale and nature of development and the potential impact on residential amenities or the future development of the site/ adjoining lands.

Having regard, to 'CAR 34: To seek the restoration of the Mill and Mill Pond and enhance

the existing and develop further pedestrian linkages in this area', it is not considered appropriate to zone these lands I1 Tourism and Leisure.

In the Development Management Guidelines (section 13.19.2.3 'Uses not listed') there is reference to how developments can be assessed on land use zonings where the uses are not listed in the 'Generally Permitted' or 'Open for Consideration' categories. This indicates proposals can be considered on their individual merits taking account of any relevant standards and criteria and the general proper planning and sustainable development of the area.

Taking this into account it is considered such an application for a tourism related use could be considered on these lands without having to amend the land use zoning. It is therefore not recommended to change this zoning.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR385

Submitted By

P Herr and Associates on behalf of Owen V Woods

Theme (s):

Rezone Carlingford

Map showing lands subject to Submission:



Summary of Submission:

Request that the lands (0.15) at River lane, Carlingford currently zoned as Existing Residential (A1) be excluded from the Settlement Boundary of Carlingford thus re-zoned to Rural Policy Zone 1.

In Support:

There is no intention of developing the site, furthermore, it is included within Flood Zone A which would preclude any residential development on the site, and zoning would contradict CAR 18 of the draft Louth CDP 2021-2027.

The northwest boundary of the Carlingford settlement centre runs along the Old Town Wall, except in the vicinity of River Lane, where it protrudes out to the west of the old town wall. This protrusion includes both the subject site and the Cul na Bala residential development on the south side of River Lane. There is no reason, given its location, size, current land-use and wishes of the landowner, to include it within the settlement centre. Mr Woods is also fearful that he may be financially penalised under possible future legislation for allowing zoned lands to remain undeveloped.

Chief Executive's Response:

The submission lands are zoned as A1 Residential Existing within the Draft Plan and there is an existing dwelling on site. They are therefore considered to be developed and sit naturally within the settlement boundary of Carlingford. It is considered that the boundary should remain unchanged.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR561

Submitted By

Carlingford Tennis Players

Theme (s):

SUP Zoning Carlingford

Map showing lands subject to Submission:

No map submitted

Summary of Submission:

- We would like the Carlingford Courts to remain as tennis courts, to be upgraded and resurfaced.
- Tennis has grown exponentially in Carlingford and the courts offer a vital social connection to the residents and newcomers to the village.
- It gives residents the opportunity to look after their physical and mental health as well as keeping connected to the community.
- Policy Objectives CAR 4 and 16 are cited.

Chief Executive's Response:

In the draft Louth CDP 2021-2027 the tennis courts in Carlingford are zoned as B1 Village Centre, whilst CAR 16 supports existing public, community and sporting facilities and the provision of any additional facilities, the maintenance and the upgrade of the tennis court falls beyond the remit of the development plan.

Chief Executive's Recommendation:

No Change

Submission No.	LCDP DR028
Submitted by:	Cllr. John Reilly on behalf of Kevin and Jackie Woods, Ghan Road, Carlingford.
Theme (s):	Rezone Carlingford

Map showing lands subject to Submission



Summary of Submission:

The submission relates to a plot of land in Carlingford, it is requested that it is re zoned to Tourism and Commercial

In Support:

Over the summer months there is a deficit of car parking for the influx of motorhomes. Heritage and children's attractions could also be developed at the site.

Chief Executive's Response:

The subject lands are zoned A1 'Existing Residential' in the Draft County Development Plan.

In the Draft Plan Carlingford is identified as an important tourism destination in Louth. The Council therefore supports the provision of additional tourist related infrastructure in appropriate locations and subject to compliance with the relevant planning and environmental criteria.

Given the proximity of the subject lands to the centre of Carlingford, tourism related use may be acceptable, subject to the scale and nature of development and the potential impact on residential amenities.

However, taking account of the fact that the land uses immediately adjacent to the site are residential it is not considered appropriate to change this zoning on this specific piece of land.

In the Development Management Guidelines (section 13.19.2.3 'Uses not listed) there is reference to how developments can be assessed on land use zonings where the uses are not listed in the 'Generally Permitted' or 'Open for Consideration' categories. This indicates proposals can be considered on their individual merits taking account of any relevant standards and criteria and the general proper planning and sustainable development of the area.

Taking this into account it is considered such an application for a tourism related use could be considered on these lands without having to amend the land use zoning.

Any tourism related proposal would be assessed on its own merits having regard to the existing established amenities of the immediate area. It is therefore not recommended to change this zoning.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR383
Submitted By	P Herr and Associates on behalf of Kevin Woods
Theme (s):	Rezone
Map showing lands subject to Submission:	



Summary of Submission:

Request that the lands (0.23) at Ghan Road, Carlingford re zoned from Existing Residential (A1) to 'Tourism and Leisure (I1).

In Support:

Site is included within Flood Zone A and in terms of the justification test it is not suitable residential development, infilling would be required which would displace flood water and emergency evacuation would not be possible. Planning permission has been refused on the basis of flooding (Planning Ref: 19/193).

Current zoning is inefficient and waste use of land. The submitter has been involved with tourism in the village for a number of years, projects are outlined. He has created a small tourism based hub in this area of the Ghan Road. The re-zoning would further complement these facilities. There is a need for the provision of an overnight/ short stay parking facility for Camper Vans/ RVs/ Motor homes within the Carlingford area.

The proposed re-zoning of the lands would represent a valid adoption of the Sequential Approach as set out in the Flood Guidelines and Policy Objective CAR 18 by substituting a higher vulnerability land use with a less vulnerable use. Furthermore, coastal flooding generally takes place outside of the normal holiday season (October- March) when the facility would be closed.

Chief Executive's Response:

The subject lands are zoned A1 'Existing Residential' in the Draft County Development Plan.

In the Draft Plan, Carlingford is identified as an important tourism destination in Louth. The Council therefore supports the provision of additional tourist related infrastructure in appropriate locations and subject to compliance with the relevant planning and environmental criteria.

Given the proximity of the subject lands to the centre of Carlingford a tourism related use may be acceptable subject to the scale and nature of development and the potential impact on residential amenities.

However taking account of the fact that the land uses immediately adjacent to the site are residential it is not considered appropriate to change this zoning on this specific piece of land.

In the Development Management Guidelines (section 13.19.2.3 'Uses not listed') there is reference to how developments can be assessed on land use zonings where the uses are not listed in the 'Generally Permitted' or 'Open for Consideration' categories. This indicates proposals can be considered on their individual merits taking account of any relevant standards and criteria and the general proper planning and sustainable development of the area.

Taking this into account, it is considered such an application for a tourism related use could be considered on these lands without having to amend the land use zoning. It is therefore not recommended to change this zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR267
Submitted By	McGahon Architects on behalf of Conor and Jackie Haughey
Theme (s):	Rezone Carlingford.
Map showing lands subject to Submission:	



Summary of Submission:

Request rezone from lands form Strategic Reserve to Residential Existing.

In Support:

- The draft Plan significantly restricts one -off housing development in Zone 1 in the Cooley area
- It is important that there are sufficient residential lands within the town in order to sustain the local community.
- Lands located to south-west Oyster Haven development (6 no. detached houses), within the town boundaries and 5minutes from the Market Square and other local amenities.
- The site is fully serviced; there are water and sewer connections available. It is accessible via entrance to Oyster Haven.
- Surrounded by residential development.

Chief Executive's Response:

1. Carlingford is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft Louth CDP 2021-2027. The focus of growth in the town during the life of this Plan will be one of consolidation.
2. As advocated in national and regional policy the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand.

3. National and Regional policy requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. In this regard it is considered that there are sufficient undeveloped lands within the settlement boundary of Carlingford to meet the projected housing requirements as set out in the Core Strategy. Whilst it is noted that review of the Strategic Flood Risk Assessment has resulted in a reduction in the quantum of residential lands available, the reduced capacity of these lands to deliver residential development had been considered in the original analysis of residential land requirement. This analysis has also factored in the ongoing implementation of the Short – Term Letting Regulations, which is anticipated to release housing back into the traditional market. In addition, there are opportunities to provide housing on infill and brownfield lands and would promote compact growth/consolidation which is in compliance with national and regional planning policy.
4. In conclusion the quantum of residential land identified for development is aligned with the housing demand for Carlingford as set out in the Core Strategy.
5. The subject lands are located to the north west of the Carlingford outside its settlement boundary, their inclusion would result in a pattern of sprawl. Furthermore, the submission lands are located in an elevated position within an Area of High Scenic Quality. Any future extension to the settlement boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR715
Submitted By	P Herr and Associates on behalf of Heather and Kenneth Brown
Theme (s):	Rezone Carlingford

Map showing lands subject to Submission:



Summary of Submission:

Lands (3.84ha) are located outside the settlement boundary of Carlingford, the following is requested:

<i>Plot No.</i>	<i>Area (Ha)</i>	<i>Proposed Zoning</i>
R1	0.434	New Residential
R2	1.403	New Residential
R3	1.618	Strategic Reserve

In Support:

- 3.84ha of land straddles the western side of the public road and 0.82ha on the eastern side.
- Permission has been granted for 3no. dwelling houses on part of the 0.82ha located the east side of the L60633-0 (Planning Ref: 19244 and 20506)
- It is proposed to extend the foul sewer network northwards from Oyster Haven, it is sized to cater for additional loading. This presents an opportunity to achieve an appropriate level of residential development density.
- Other lands zoned Residential New in Carlingford are located within Flood Zones, this is contrary to Policy Objective CAR 18. Furthermore, flood risk will sterilise at least 50% of the land, it will not be possible to provide the desired quantum of residential units within Carlingford.
- Development is concentrated to the south of Carlingford, development of these lands will address this.

Chief Executive's Response:

Please refer to Points 1-4 of Submission No. 0267

Furthermore, the submission lands lie north of and outside the settlement boundary of Carlingford. Their inclusion within the settlement boundary would result in a pattern of sprawl and extended linear elongation of village in a northerly direction. Additionally, the submission lands are located in an elevated position within an Area of High Scenic Quality. Any future extension to the settlement boundary must consider the potential impact on this sensitive landscape.

It should be noted that there is no planning history pertaining to the subject lands.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR790

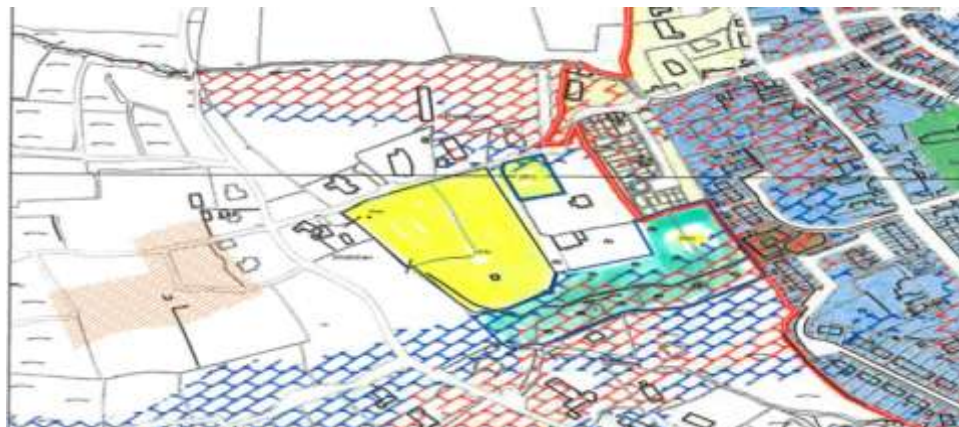
Submitted By

P Herr Associates on behalf of Heather and Kenneth Brown

Theme (s):

Rezone

Map showing lands subject to Submission:



Summary of Submission:

The submission requests the following:

Plot No.	Area (Ha)	Proposed Zoning
R1	0.136	New Residential
R2	1.27	Strategic Reserve
R3	1.29	New Residential

In Support:

- R1 can be considered as a separate landholding, it has access onto River Lane and would be suitable for a dwelling.
- R2 and R3 are surrounded by residential development thus infill.
- All sites have access onto River Lane, served by foul sewer and water infrastructure, lie outside flood zone, within 300m of village centre and were previously zoned residential.

Chief Executive’s Response:

Please refer to Points 1-4 of submission No. 267.

The subject lands are outside the settlement boundary of Carlingford to the north west of the settlement, they are removed from the built up area of the settlement and in terms of the sequential approach the zoning of these lands would not accord with these principles. They are not considered to be an infill opportunity, as such their inclusion would result in a pattern of sprawl.

Furthermore, the submission lands are located within an Area of High Scenic Quality. Any future extension to the settlement boundary must consider the potential impact on this sensitive landscape.

Chief Executive’s Recommendation:

No Change

Submission No:	LCDP DR162
Submitted By	Patrick McShane
Theme (s):	Rezone Carlingford
Map showing lands subject to Submission: (suggested location)	



Summary of Submission:

Request that the town boundary of Carlingford is extended along Grove Road and the old Dundalk Road to the Council built houses at Moneymore, encompassing the land at both sides of the road and that the lands are to be zoned New Residential (RN) with provision for a small filling station and shopping facility.

The letter submitted at Stage 1 was also resubmitted, the issues raised in both are summarised below:

- Family members have bought land within 10m of the town boundary but because they have been reared in town they are precluded from building on said lands. They have unsuccessfully sought sites within the town boundary
- These lands are suitable as it's unlikely that the town can extend along the Omeath and Greenore Roads nor by Mountain Park.
- Development of lands would facilitate link between Grove and Greenore Roads which would eliminate traffic from the village.
- Submission lands adjoining the sewage treatment plant are close to schools, community facilities and a church.
- Filling station and shop are presently lacking and it is difficult to gain access to the town centre at weekends.

Chief Executive's Response:

Please refer to Points 1-4 of Submission No. 267

The subject lands are 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.

No map has been submitted showing the location of the proposed filling station and whilst filling stations are generally not encouraged in the open countryside, they could be considered under Chapter 13, Section 13.19.2.3 'Uses not listed'. It is not considered appropriate to rezone lands for same.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR340
Submitted By	Mc Shane Family
Theme (s):	Rezoning Carlingford
Map showing lands subject to Submission:	



Summary of Submission:

Request that lands marked green on the map attached are included in the Carlingford Settlement boundary.

In Support:

- Letter of support from Peter Fitzpatrick stating that the Mc Shane family live in the Carlingford/ Cooley area and are constantly having issues with planning permission without any success. Family/ friends reside in the area. They grew up in and went to school in Carlingford, also play for local GAA. The only way to resolve this issue is to extend the boundary to the south of the Map.
- Born and reared in the rural area over time they have been included within the town boundary,
- The only solution is to include lands to the south of the boundary as it is included within 300m
- Rural Housing Policy is too restrictive and prevents natives from living in their town land.
- Some of the lands are presently in Strategic Reserve and should be kept for green for town enhancement.
- Extending south ward would mean joining up numerous houses on the Grove Road and out to the Louth County Council and Moneymore.
- A ring road could be considered to join Greenore Road to Grove Road on one of the traditional cart passes to alleviate traffic through the village.

Chief Executive's Response:

Please refer to Points 1-4 of Submission No. 0267

It should also be noted that the lands are located at the southern edge 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

Chief Executive's Recommendation:

No Change

Submission No.

LCDP DR006

Submitted by:

Kate, Jessica and Adam Booth

Theme (s):

Rezone Clogherhead

Map showing lands subject to Submission:**Summary of Submission:**

Increase Clogherhead Town Boundary by 1.34ha at Chapel Road, Clogherhead to accommodate rural one off housing.

Chief Executive's Response:

Clogherhead is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand.

National and Regional policy requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. In this regard it is considered that there are sufficient undeveloped lands within the development boundary of Clogherhead to meet the projected housing requirements as set out in the Core Strategy.

This includes a number of infill and brownfield sites where there is potential for residential development to the rear of existing properties. A Spot Objective supporting such development proposals on these lands could be inserted on the zoning map for Clogherhead.

There is no requirement to identify any additional lands for development in Clogherhead. The zoning of the subject lands would result in the quantum of residential lands available being in excess of that required to meet the housing demand for Clogherhead as set out in the Core Strategy.

In conclusion, the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made to this land use zoning.

The subject lands are outside the development boundary of Clogherhead to the 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 contrary to national and regional planning policy.

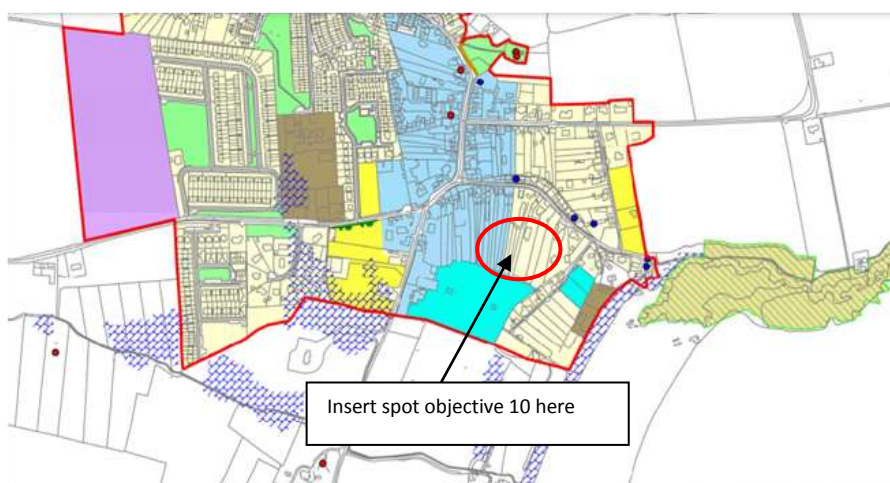
Furthermore, the submission lands are located within an Area of High Scenic Quality. Any future extension to the settlement boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation

Insert a spot objective on the zoning and composite map for Clogherhead as follows:

Spot Objective 10

To support the redevelopment of these lands for residential development in a coordinated and comprehensive manner subject to compliance with the relevant standards and guidance set out in the County Development Plan.



Submission No:	LCDP DR348
Submitted By	Stephen Ward on behalf of Yack Unlimited Company
Theme (s):	Rezoning Castlebellingham Kilsaran
Map showing lands subject to Submission:	



Summary of Submission:

Request that the subject site (3.92ha) which is presently zoned General Employment (E1) is designated as a Village Centre Opportunity Site to accommodate Village Centre Type Uses to include shops, offices, residential, community, tourism related and other similar type uses.

The following also form part of the submission:

- Appendix A- Technical Report by Waterman Moylan Consulting Engineers
- Appendix B -Village Enhancement Plan by van Dijk Architect

In Support:

National Planning Policy

NPO6 of the NPF is specifically mentioned in relation to regeneration. It is stated that designation of the lands as an opportunity site would be compliant with same.

Site Context, Characteristics and Consistency with NPO.

Planning permission for the conversion of night club to convenience store was previously granted (07/887 as extended by 12/885). As per the Planner's Report the Kilsaran Village is poorly serviced and no employment uses have come forward on the subject site

Designation of the site as an 'Opportunity Site' would enhance environment and services available, in a village which lacks a focal point. Subject lands are in a highly prominent position and are beside an existing cluster. It would be in compliance with the following policy objectives in the draft Louth CDP 2021-2027 CAS1, 2, 4, 6, 8, 12, 13, 24 and 25.

Role and Potential of Brownfield Sites in Delivering Housing

The draft Louth CDP 2021-2027 encourages developing brownfield/infill sites over greenfield lands, submission lands previously accommodated a complex of commercial and industrial buildings.

Their designated as an 'Opportunity Site' would be in compliance with Policy Objective CS 2 of the draft Louth CDP 2021-2027 which encourages compact growth.

Residential development on infill and brownfield sites should be considered "windfall" and should not be counted towards meeting housing requirements.

It is a national planning policy objective to encourage higher densities in town and village centres and the designation of the subject lands as an 'Opportunity Site' to facilitate mixed uses, including residential uses would be entirely consistent with this objective.

In the absence of national guidance on preparation of development plans, a flexible approach should be taken to the provision of population targets and, population growth rates should be seen as minimum targets.

The 'Regional Demographic and Structural Housing Demand at County Level' (ERSI Dec2021), suggests that housing allocations are 30% / 8000 units lower than required. As such Louth may under perform in terms of achieving their population and housing targets.

ESRI advised that obsolescence rate needs to be factored in which has not been done in the draft Louth Housing Strategy.

The technical Report by Waterman Moylan Consulting Engineers concludes that the development site is well located in terms of proximity to existing services and road access.

The village enhancement plan concludes that Kilsaran has developed in a linear fashion, is dominated by the roadway without a strongly defined village core. Enhancement plan will create a heart to the village, improve the streetscape and open spaces. The old quarry site is a prime nodal point and has potential to become the heart of the village. Housing, community facilities and service hub will embed zero energy principles and be climate resilient.

Chief Executive's Response:

Village Centre Type Uses

Whilst Castlebellingham /Kilsaran are separate entities, in terms of services and facilities they are interlinked and interdependent. The submission lands are located c.1km south of Castlebellingham's Village Centre, where there is a presently a degree of vacancy. It is considered that the development of the submissions lands for village centre type uses would further detract from the vitality and viability of Castlebellingham's village centre.

Housing

Castlebellingham /Kilsaran is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand.

National and Regional policy requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. In this regard, it is considered that there are sufficient undeveloped lands within the development boundary of Castlebellingham /Kilsaran to meet the projected housing requirements as set out in the Core Strategy.

There is no requirement to identify any additional lands for development in Castlebellingham /Kilsaran. The zoning of the subject lands would result in the quantum of residential lands available being in excess of that required to meet the housing demand for Castlebellingham /Kilsaran as set out in the Core Strategy.

The submission indicates that infill and brownfield lands should not be included in the housing allocation and treated as 'windfall' sites. The Council does not agree. National policy requires 30% of housing to be delivered on infill and brownfield sites in order to achieve compact growth. Calculating the quantum of land that can be provided on such lands is therefore a critical element of the identification of total residential lands required in a settlement and the overall County.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. It is therefore recommended that no change is made to this land use zoning.

Castlebellingham /Kilsaran is a Self-Sustaining Town where the focus will be on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. Notwithstanding the brownfield nature of the site as per above, there are sufficient lands zoned for residential purposes and the zoning of lands for village centre uses would detract from Castlebellingham's village centre, it is therefore considered appropriate that the lands remain as General Employment.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR589
Submitted By	Seamus Cairns
Theme (s):	Rural, Zoning Castlebellingham/Kilsaran
Map showing lands subject to Submission:	



Summary of Submission:

- Name to be added to submissions received concerning rural planning. Community will be devastated with people leaving the area , this has impacted upon GAA club.
- Due to Coronavirus a community response to recreational facilities in Castlebellingham/ Kilsaran has been difficult to coordinate. Like to enquire regarding the area designated as 'Community Facilities' in the Louth CDP 2015-2021. The area is centrally located between Kilarsan and Castlebellingham. Would like update on status of these lands

Chief Executive's Response:

Please refer to Rural Policy General Composite Response.

The draft Louth CDP 2021-2027 indicates that the community lands referred to in this submission will continue to have the same land use zoning objective as that in the current Louth CDP 2015-2021. Land use objectives in relation to same can be found in Chapter 13, Section 13.19.19 page 13-66.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR144
Submitted By	Stephen Ward on behalf of Cheverdale Ltd.
Theme (s):	Rezone Termonfeckin, Core Strategy
Map showing lands subject to Submission:	



Figure 1 - Site Location Map

Summary of Submission:

Submission relates to a parcel of land 5.61 ha the submission requests the rezoning of lands from Strategic Reserve (L1) to New Residential (A2) on the Termonfeckin Village Plan.

In Support:

Context

The submission site is located to the west of Balfeddock Manor (planning reference 16/722 as varied by 18/897) which is presently under construction. In the assessment of 16/722, which pertains to a housing development of 51 units and the completion of the partially constructed link road between R167 and R166. The planning authority acknowledged the brownfield nature of the application site. Zoning of the submission lands for residential development would facilitate the completion of a partially permitted and constructed link road between the Baltray Road (R167) and the Drogheda Road (R166).

Community Facilities.

There are a range of community facilities in proximity to the site, map attached.

Population

In the absence of national guidance on preparation of development plans a flexible approach should be taken to the provision of population targets and that as per the Director's report on the 'Regional Spatial Strategy', population growth rates should be seen as minimum targets. As per Chapter 2, Table 2.9 the draft Louth CDP 2021-2027 it is envisaged that there will be a reduction in the rate of population growth in the County over this Plan period, this will conflict with the development of the Regional Growth Centre and undermine Termonfeckin's ability to grow or even sustain community, commercial recreational and educational services.

Core Strategy

It is not clear how the various figures in Table 2.4 of the Core Strategy are derived. Neither brownfield / infill sites nor 'one off' houses should be included within the housing land allocation. A housing allocation of only 40 units for a self-sustaining town such as Termonfeckin is too low.

Tiered Assessment

Submission lands would score well in terms of infrastructure including roads, footpaths, public lighting, waste water and water supply. Notwithstanding this Site 4 scored poorly due to its marking for consolidate/compact growth and infill/ backland. It is contended that the northern portion of land would be considered brownfield having previously been subject to construction and engineering works, a footpath would be available and zoning of the land would facilitate completion of the link road.

Chief Executive's Response:

Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements will be based on meeting local demand.

Brownfield Lands

The submission indicates that infill and brownfield lands should not be included in the housing allocation and treated as 'windfall' sites. National policy requires 30% of housing to be delivered on infill and brownfield sites in order to achieve compact growth. Calculating the quantum of land that can be provided on such lands is therefore a critical element of the identification of total residential lands required in a settlement and the overall County.

It is accepted that the adjacent lands were identified as brownfield lands under application 16/722 however it must also be taken into account that there is a legacy of excess zoning in Termonfeckin which has resulted in a requirement to include lands in a Strategic Reserve. National and Regional policy now requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing.

Core Strategy Allocation

The Council considers the core strategy allocation for Termonfeckin to be reasonable given the size of the settlement and position in the settlement hierarchy. The Council does not agree that 'one-off' housing should not be included in the Core Strategy allocation. National Policy Objective 20 in the NPF requires a projection of single housing in the countryside to be included in the Core Strategy, a point which has also been referenced in the submission from the OPR in respect of this Draft County Development Plan.

Population Projection

The population projection for Louth up to 2031 is set out in the NPF Implementation Roadmap published in 2018. The Council availed of the additional 25% population headroom up to 2026 as provided for in the Roadmap.

Any population projection in excess of that set out in the Roadmap would result in the plan being inconsistent with national policy. The Council therefore does not consider it to be appropriate for the Plan to have a population projection greater than that set out in the National Planning Framework or which undermines the settlement hierarchy for the County.

Potential Yields of Lands Zoned A2 'New Residential'

A review of the lands identified as 'New Residential' development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated. Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered. The other 2 areas of 'New Residential' land in the town will facilitate small scale infill developments. Taking this into account an additional area of land for residential development has been identified in Termonfeckin to ensure there are sufficient lands available to meet the projected population. See the response to submission no.741 for further details.

Subject Site

As previously indicated, national and regional policy advocates that an evidence based approach is taken to the identification of lands and the quantum of lands required for residential development. This approach is set out in the Infrastructure Assessment and Land Use Evaluation in Appendix 2 of Volume 3.

Whilst it is acknowledged a case could be made that it is a brownfield site, the lands are removed from the built up area of the settlement and in terms of the sequential approach to development, the zoning of these lands would not accord with these principles.

In conclusion the quantum of residential land identified for development has to align with the housing demand for each settlement as set out in the Core Strategy. The zoning of these lands would not follow the principles of the sequential approach to development. It is, therefore, recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR170
Submitted By	Owen and Geraldine Kirwan
Theme (s):	Rezone Termonfeckin
Map showing lands subject to Submission:	



Summary of Submission:

Request that lands at Forge Farm, Termonfeckin are rezoned from Existing Residential to reflect existing uses on site.

In Support:

- Site at Forge Farm is used as retail/commercial and accommodates the following businesses; Forge Field Farm Shop, Forge Field Garden Centre, Forge Field Café and Gareth's butchers. These uses were approved under Planning References 03/3, 05/1207 (farm shop extension) and 14/67 (farm shop extension).
- Termonfeckin's Settlement boundary transects the Forge Field farmyard, there is an opportunity to review the lands shaded blue on the map Rural Policy Zone 2, to allow for future farm diversification projects which would accord with the following policies: TER 1, 2, 6 and 7.

Chief Executive's Response:

The subject lands are identified as Rural Policy Zone 2 in the draft Louth CDP 2021-2027, farm diversification projects are not precluded within Rural Policy Zone 2, each application will be assessed on its own merits on a case by case basis. This is set out in Chapter 5 section 5.19 'Rural Economy'. It is therefore not considered necessary to re-zone the site.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR191
Submitted By	Brady Hughes on behalf of Des Campbell
Theme (s):	Rezone Termonfeckin
Map showing lands subject to Submission:	



Figure 2 – Proposed Amended Land Use Zoning Map

Summary of Submission:

There is a parcel of land (0.51ha) zoned Residential New (A2) on the Coast Road at Termonfeckin, it is requested to have the settlement boundary aligned to reflect the line shown on Figure 2 above, this would result in an additional 0.12ha of Residential New (A2) land.

In Support:

- Termonfeckin is identified in the Draft Plan as one of the level 3 settlements of ‘Self Sustaining Towns’
- Termonfeckin has an abundance of options when it comes to community and social infrastructure.
- The housing allocation of 41 units for Termonfeckin over the plan period is too low – the joint lowest of the five Level 3 settlements. Castlebellingham gets double Termonfeckin’s allocation; Clogherhead gets 3.5 times Termonfeckin’s allocation and Tullyallen nearly three times more. All of these settlements are planned to have similar population growth of perhaps 15%. In the case of Termonfeckin, it seems that the housing allocation is limited because of extant permission for 96 units. Over 70 of these are related to a single developer thus controlling the market.
- The RSES, underpinning the NPF policies says that facilitating housing in the rural parts of the region is of paramount importance to ensure the vitality and viability of small towns and villages. The RSES tells us that promoting housing and population growth in rural settlements is a viable alternative to rural one-off housing. This contributes to the principle of compact growth
- • A2 zoned lands as per the Draft Plan do not provide enough land to deliver even the allocated 41 Units. A study of the of the 4 sites zoned as Residential New (RN) was undertaken and the constraints for each site outlined, it was concluded that they have the potential to deliver a maximum of 26 units, and it is noted that whilst being zoned since 2004, none have any planning history.

- Housing allocation for Termonfeckin should be increased and the land use zoning map should be amended to include for additional A2 zoned lands.
- The site will be more suitable for development.

Chief Executive's Response:

Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

The lands in question are located to the east of the settlement, immediately contiguous with Termonfeckin's urban footprint, it is considered that the inclusion of these lands within the settlement boundary and their rezoning to A2 New Residential provides for a more coherent settlement boundary facilitating a more integrated and cohesive design and site layout at this location and will facilitate consolidated growth of the settlement. This minor adjustment will not result in the Plan being inconsistent with the Core Strategy, national or regional planning policy.

Chief Executive's Recommendation:

Include submission lands within the settlement boundary of Termonfeckin and zone as A2 Residential New.

Submission No:

LCDP DR194

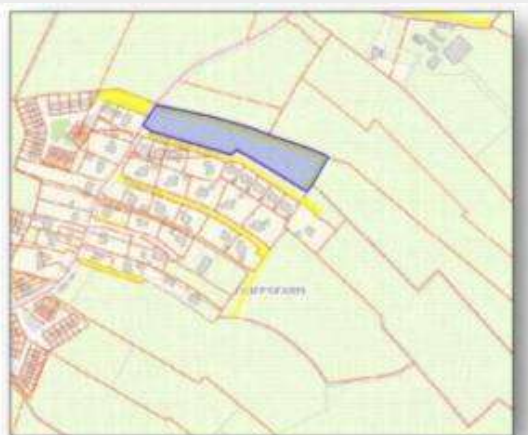
Submitted By

Brady Hughes on behalf of Gerard Reilly

Theme (s):

Rezone Termonfeckin

Map showing lands subject to Submission:



Summary of Submission:

Submission requests the following:

- Extend the development boundary to include lands within the settlement. Zone lands 'G1 Community Use' so as to allow for the development of a sheltered housing scheme for older people at this location.
- Increase the core strategy housing allocation for the settlement of Termonfeckin to provide an equitable level of development when compared with other Level 3 Settlements.

- Include a statement in the Termonfeckin Written Statement at Section 4 of Volume 2 to reflect the general policy expressed through HOU 12 in Volume 1 of the Draft CDP
- Include a policy objective in Section 4.11.1 with the following wording: TER 5: To secure and encourage the development of residential developments specifically designed for older persons and those with limited mobility on lands zoned for community use on the coast road.

In Support:

Background

Our clients are the owner of 3ha of land along the Coast Road , Termonfeckin and wish to provide affordable housing to cater for the needs of older people

Aging Population, and Housing Demand and Planning Policies.

The population of people in Ireland aged 65 and over is expected to increase by a third over the next 8 years, and to double over the next 25 years. Current alternative housing options for older people are extremely limited. Developing options for older peoples' supported housing can provide a viable alternative in many cases. 2016 Census information for the Termonfeckin Electoral division shows that the average age of the population in Termonfeckin has increased by 5% and there is demand for social housing in Termonfeckin, 10% are over 55, and over 2/3rd of that demand is for 1 and 2 bed units. The Draft Plan does not address these specific needs.

National and Regional Planning policies

An over view of National and Regional planning policy has been undertaken. In relation to housing for older people NPO 30 and 34 are specifically mentioned. RPO 19 of the RSES's emphasis the need for flexible housing solutions for older people.

Draft Louth CDP 2021-2027

A detailed analysis of the Draft Louth CDP 2021-2027 in relation to housing for older people has been undertaken, Sections 3.8 and 4.12.1, HOU 12 and SC40 are specifically mentioned. In terms of Termonfeckin it stated that the written statement makes no reference to the settlements role in providing housing options for older people as per HOU12.

Core Strategy and Housing Allocations

A table was devised summarising the draft Louth CDPs 2021-2027 core strategy approach, an analysis of same concludes:

- Allocation of 41 houses is too low.
- Castlebellingham gets double the allocation, Clogherhead gets 3.5 times Termonfeckin's allocation and Tullyallen nearly three times more.
- It is intended to grow Termonfeckin's population by the biggest %, but it gets the lowest unit allocation. Given extant permission for 56 units not built, plus the allocation of 41, that gives a total of 97 units that could be built between now and 2027 in the village, to support a population increase of 250 units. This means that an average occupancy of over 2.5 must be achieved.

This means that if one and 2 bed units are built in order to meet a shortfall in those typologies best suited for older people, then the targets cannot be met.

Potential for Residential Development on A2 Zoned Land

A study of the 4 sites zoned as Residential New (RN) was undertaken and the constraints for each site outlined, it was concluded that they have the potential to deliver a maximum of 26 units, and it is noted that whilst being zoned since 2004, none have any planning history. The A2 zoned land in Termonfeckin is very unlikely to deliver the required numbers, and additional appropriately located lands should be zoned for residential purposes thus it is stated that the site should be rezoned to Residential and Open Space

Chief Executive's Response:

Points 1 and 2

The subject lands are located on the northern edge of the settlement boundary of Termonfeckin to the east of the R166. Lands to the south and east are residential while the lands to the north are agricultural. Taking account of the location of the lands with no established services or facilities for older people in the immediate area, it is not considered that this is the most appropriate location for such accommodation in Termonfeckin.

Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand. It is considered that the population and housing allocation for Termonfeckin during the life of the Plan is reasonable, taking account the position of the settlement in the settlement hierarchy, recent patterns of development in the area, and national and regional policy.

A review of the lands identified as 'New Residential' development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated. Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered. The other 2 areas of 'New Residential' land in the town will facilitate small scale infill developments. Taking this into account an additional area of land for residential development has been identified in Termonfeckin to ensure there are sufficient lands available to meet the projected population. See the response to submission no.741 for further details.

With regard to the subject lands taking account of the principles of the sequential approach to development there are more appropriately located lands closer to the town centre that are more suitable for development.

Point 3

There are numerous policy objectives within the draft Louth CDP 2021-2027 pertaining to provision of housing for elderly persons including Policy Objective HOU 12, these apply throughout the Plan area therefore it is not deemed necessary to repeat them within Termonfeckin or any other settlement.

Point 4

The proposed policy objective is linked to the subject lands being zoned for a use to provide sheltered accommodation for older people. Taking account of the fact that it is recommended that this zoning proposal is not accepted this policy objective would not be required.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR324

Submitted By

David Doyle and Deirdre Murphy

Theme (s):

Rezone Termonfeckin

Map showing lands subject to Submission:



Illustration 3: Plan showing Requested Alteration to Settlement Boundary.

Summary of Submission:

The submission welcomes zoning of additional lands as Community Facilities G1 in the draft CDP 2021-2021 to allow the extension of Sunhill Nursing Home.

The submission requests the further extension of the settlement boundary (1.5ha) to allow for construction of supported living houses, lands could be zoned as New Residential A2 or Community Facilities G1.

In Support:

- Details are provided regard ESRI's population projections - by 2040 approximately 23% of the population will be over 65.
- Section 5.4 of the NPF refers to allowing older people to live in their own homes as long as possible; the proposal is in compliance with same.

- Proposal complies with RES 7 of the draft Louth CDP 2021-2027.
- The 'Irish Longitudinal study' concludes that people are living longer and there is a short supply of housing for this vulnerable group, the proposal would help meet this demand.
- It is stated the retirement village at Moorehall is reflective of the type of facility that is envisaged for the site, the advantages of Moorehall are outlined.

Chief Executive's Response:

Statistics regarding ageing population are noted. There would be no objection to the inclusion of the subject lands within the settlement boundary of Termonfeckin and zoned as 'G1 Community Facilities' thereby allowing the extension of the existing nursing home complex at Sunhill to provide for supported living housing/retirement village.

It is considered that this would be in compliance with policy objectives SC 9, HOU 12 and SC 40 of the draft Louth CDP 2021-2027 as well as national and regional planning policy.

Chief Executive's Recommendation:

Include submission lands within the settlement boundary of Termonfeckin and zone as 'G1 Community Facilities'.

Submission No:

LCDP DR639

Submitted By

David Millar on behalf of Peter Collier

Theme (s):

Rezone Termonfeckin

Map showing lands subject to Submission:



Summary of Submission:

Rezone lands outlined blue on map from Rural Policy Zone 2 to Residential.

In Support:

- Lands located 15min from village centre, have frontage along the R167 and access to services, and would be ideal for one off housing or cul-de-sac development.

- Poor planning does not provide a proper balance of housing stock for first time buyers, those wishing to downsize, single persons requiring one and two bedroom homes and low density development for those who want to build own homes. The village has no residentially zoned land.
- Ribbon development and common feature along the Baltray Road.
- Rezoning would be in accordance with the following Policy Objectives TER 1, TER2, TER3, TER4 and TER5.
- Only 41 new residential units are allocated to Termonfeckin in the Draft Louth CDP 2021-2027, this is too low. Termonfeckin has the joint lowest allocation of the five Level 3 settlements, despite having the second highest population.
- Termonfeckin is in close proximity to Drogheda and there is a strong demand for housing. The low allocation will not allow Termonfeckin to reach its potential as a Self-Sustaining Town.

Chief Executive's Response:

The subject lands are outside the development boundary of Termonfeckin to the south of the settlement. Their inclusion would exacerbate the pattern of sprawl which would be detrimental to the overall character of the settlement. Furthermore, the zoning of the submission lands for residential use would contribute to the convergence of settlements of Termonfeckin and Baltray.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR741

Submitted By

Downey Planning on behalf of J Murphy

Theme (s):

Rezone Termonfeckin

Map showing lands subject to Submission:



Summary of Submission:

Request rezoning of lands (5.3ha) at Drogheda Road, Balfeddock, Termonfeckin from Strategic Reserve (L1) to Residential New (A2).

1. Planning History

Planning history of the site (planning references 06/265 and 12/24) and the lands immediately to the south (planning references 01/487, 01/1487, 06/943, 08/206, 16/722, 18/897, 19/711, 19/907 and 20/169), as well as adjoining lands (93/380, 00/1649, 06/62, 00/1628, 03/1330), has been provided.

2. National, Regional and Local Planning Policy.

An analysis of the national and regional planning policy has been undertaken. In terms of the NPF, NPO's 33 and 35 are cited. It is stated that the NPF emphasises the renewal and development of existing settlements, rather than continual expansion and sprawl of cities and towns. Rebuilding Ireland, An action plan for housing and homelessness (2016) is mentioned. In terms of the RSES, RPO's 4.1 and 4.2 are specifically highlighted. The lands are zoned as Strategic Reserve in both the Louth County Development Plan 2015-2021 and the draft Louth County Development Plan 2021-2027.

The subject lands are contiguous to the existing built-up area of the town of Termonfeckin (within 500m of centre), have direct road frontage and can connect to all the necessary services and utilities.

The uses 'Generally Permitted' and 'Open for Consideration' in the Residential New Zoning are provided. It stated the rezoning of lands will complement the overall land use in the vicinity and will assist in the consolidation of the residential area for Termonfeckin which is in keeping with national, regional and local policies.

3. Core Strategy, Housing Policies and Objectives

The strategic vision for the County is referred to, policy objectives pertaining to the Core Strategy are quoted, namely CS2 and CS13. Termonfeckin is a self-sustaining town as per Table 2.14 (Core Strategy Table). There is a total of 2.4ha of land zoned New Residential in Termonfeckin. The town has a projected population increase of 250 persons by the end of the Plan period.

The re zoning of the subject lands to New Residential will facilitate compact, sustainable growth and allow the settlement to reach projected population.

4. Self-Sustaining Towns Termonfeckin

Rezoning of the lands will be in compliance within TER 1 and TER 4.

5. Site Assessment and Land Use Evaluation.

As per the Infrastructure Assessment and Land Use Evaluation in Appendix 2 of the Draft Plan, the subject site is located within Site 4. Site 4 should be split into a northern and southern portion, the northern portion which form the submission lands and is within 500m of village centre and could be rezoned to New Residential.

6. Serviceability & Accessibility of the Lands

The subject lands can be considered to be well-serviced and readily available to connect to the existing water infrastructure. The subject lands are highly accessible, they are located along the R166 and there are regular bus services. The objective to provide a road line from the Drogheda to Baltray Roads is noted.

7. Consolidation of the Built Environment

Site is surrounded by residential development and in proximity to Village Centre, rezoning would be in accordance with HOU18 of the draft Plan.

8. Housing Needs & Delivery

The housing requirements pertaining to the current Development Plan envisioned a total of 4,001 units to be provided between 2015-2021. According to the Housing Strategy for the Draft Plan, c. 2,040 units were delivered between 2016- 2020, there is pent-up demand for housing. Sufficient lands should be zoned for residential purposes and have regard to headroom. The subject lands have the potential capacity to deliver new homes and support the compact and sustainable growth.

It is estimated from a HNDA assessment that the available zoned lands within Termonfeckin would require to be built out completely within the lifetime of the Development Plan at a density of approximately 42 units per hectare in order to achieve the population growth. This is not viable for the area and not achievable in Termonfeckin. A density of 20-25 units/ha would be appropriate which require a greater quantum of land.

Chief Executive's Response:

A review of the lands identified as 'New Residential' development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated. Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered. The other 2 areas of 'New Residential' land in the town will facilitate small scale infill developments.

Taking this into account it is accepted that additional lands for 'new residential' development are required to ensure there are sufficient lands available to meet the projected population. In this regard it is proposed to change the zoning of c.2.1 hectares of the subject lands from 'L1 Strategic Reserve' to 'A2 New Residential'. The change of zoning will be to the lands in the northern most section of the subject lands which would be consistent with the principles of sequential development and facilitate the consolidation of development on lands close to the town centre.

It is acknowledged that the Infrastructure Assessment and Land Use Evaluation in Appendix 2 of the Draft Plan, includes the subject lands within Site 4. Within the reassessment of the subject lands it was accepted that there are parts of Site 4 that are proximate to the town centre that would be in accordance with the principles of sequential development.

The population projection for Louth up to 2031 is set out in the NPF Implementation Roadmap published in 2018. The Council availed of the additional 25% population headroom up to 2026 as provided for in the Roadmap. Any population projection in excess of that set out in the Roadmap would result in the plan being inconsistent with national policy

It should be noted that when designating a housing allocation to Termonfeckin the core strategy also had regard to the quantum of extant permissions within the settlement.

Chief Executive's Recommendation:

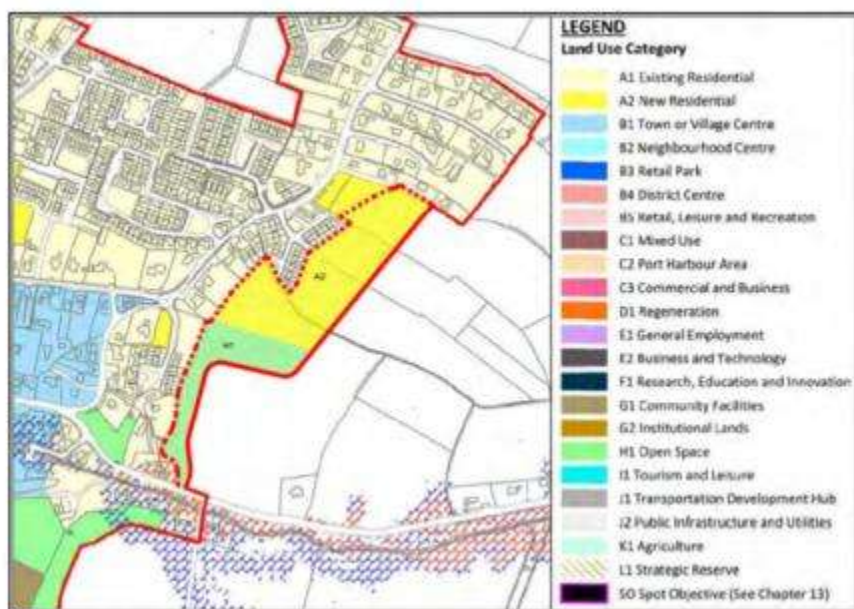
Change the land use zoning of 2.1 hectares of the northern most section of the subject lands from 'L1 Strategic Reserve' to 'A2 New Residential'.

Submission No: LCDP DR189

Submitted By Brady Hughes on behalf of Mr Andrew Purcell

Theme (s): Rezone Termonfeckin, Additional Wording,
Core Strategy

Map showing lands subject to Submission:



Summary of Submission:

This submission requests the following:

1. Housing Allocation for Termonfeckin is increased to achieve equity with other self-sustaining towns, this can be achieved by reducing housing allocation in Ardee, Dunleer and the open countryside.
2. Include a series of objectives and implementation measures setting out how Termonfeckin can achieve its tourism and job growth potential including the identification of appropriate sites. A comprehensive vision statement in this regard should be included in the written statement.
3. Land Use zoning Map to be amended it is requested that the lands shown in the map above are re -zoned from Rural Policy Zone 2 to New Residential (A2) and Open Space (H1). Open space would allow green spaces accessible from the centre of the village and a pedestrian/cycle link to the Seapoint road. This A2 land could deliver 50 – 75 units.

With respect to No 1:

A table was devised summarising the draft Louth CDPs 2021-2027 core strategy approach, an analysis of same concludes:

- Population of the Regional Growth Centres is to increase by nearly 20%,
- Populations of Ardee and Dunleer to increase by almost 40% (which is contrary to NPO 9 of the NPF)
- Populations of Self Sustaining Towns only increase by 13.8%,
- 11% of the total county housing allocation is set aside for one off houses- this figure is bigger than housing allocation for the Level 4 and Level 3 settlements combined, which is contrary to national and regional policies,
- Housing Allocations for Self-Sustaining towns (Termonfeckin, Tullyallen, Clogherhead, Carlingford, and Castlebellingham/Kilsaran) are only 5% of the county total, and
- The Housing Allocation for smaller settlements and the open countryside amounts to 15% of the overall projected allocations

The role of Level 3 settlements is outlined; to cater for rural housing needs, provide a viable alternative to one-off housing, provide a range of different development types including self-serviced sites, avoid sprawl and encourage compact growth. Section 2.2, NPO's 6 and 19 of the NPF are specially mentioned in relation the viability of smaller towns and rural settlements. It is stated that Termonfeckin can play an important role as an alternative location for residential growth in open countryside.

Section 4.8 (RPO 4.8) of the RSES's identify most of County Louth as being an area under strong urban influence. Section 3.17.2 of the Draft CDP requires that persons living in the open countryside demonstrate a 'social need'. Tables 3.4 and 3.5 of the draft Louth County Development Plan 2021-2027 do not set out what constitutes a 'social need'. -This is contrary to national and regional policy.

It is suggested that LCC reconsider Housing Allocations to increase the level of residential development in Level 3 Settlements at a closer rate to that of the Level 2 and Level 1 settlements and that the housing allocations for one-offs should be reallocated to settlements with a suitable level of social and community infrastructure, piped public services and public transport services such as Termonfeckin, this would be in accordance with NPO 6 and 19 of NPF

Furthermore, Termonfeckin's Housing Allocation of 41 units within the plan period is disproportionately low when compared with other Level 3 settlement towns- the joint lowest of the five Level 3 settlements, with the second highest population. It seems that the housing allocation is limited because of extant permission for 96 units, however 70 of these are related to a single developer thus controlling the market.

With respect to No. 2 it is stated:

- The Jobs / Worker Ratio for the settlement is 0.32, the town is not in fact self-sustaining,
- Section 4.2 lists the opportunities for Termonfeckin, however it doesn't say how these opportunities might be realised. In particular the draft plan sets no vision in relation to tourism potential,

- No site nor strategy has been identified in relation to remote working hub (Section 4.4)
- Section 4.9 of the Termonfeckin written statement mentions the abundance of community facilities, however it does not include the pitch and put course and the caravan/mobile home parks nearby, nor the walking routes through the housing development at Sea Point golf club, An Grianan and linking with the Town centre via the sea point road,
- The written statement for Termonfeckin fails to set out a comprehensive vision , the aims and objectives are un-ambitious and will not result in the sustainable growth, and
- There is no service or infrastructure deficit in Termonfeckin, thus Termonfeckin is considerably different to other Level 3 settlements such as Tullyallen and Clogherhead. Furthermore, both perform considerably worse than Termonfeckin from a Job/worker ratio (0.2 and 0.17 respectively) yet have multiples of Termonfeckin's housing allocation (139/115 versus 41). No explanation is provided.

With respect to No. 3 it is stated:

A study of the of the 4 sites zoned as Residential New (RN) was undertaken and the constraints for each site outlined, it was concluded that they have the potential to deliver a maximum of 26 units, and it is noted that whilst being zoned since 2004, none have any planning history. The A2 zoned land in Termonfeckin is very unlikely to deliver the required numbers, and additional appropriately located lands should be zoned for residential purposes, thus it is stated that the site should be rezoned to Residential and Open Space.

Chief Executive's Response:

1. Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand. It is considered that the population and housing allocation for Termonfeckin during the life of the Plan is reasonable, taking account the position of the settlement in the settlement hierarchy, recent patterns of development in the area, and national and regional policy.

A review of the lands identified as 'New Residential' development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated.

Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered. The other 2 areas of 'New Residential' land in the town will facilitate small scale infill developments. Taking this into account an additional area of land for residential development has been identified in Termonfeckin to ensure there are sufficient lands available to meet the projected population. See the response to submission no.741 for further details.

Whilst the relationship of the subject lands with the town centre are noted, in addition to the proposal to include an area of open space within the lands, the quantum of residential lands proposed to be included would be in excess of that required for Termonfeckin during the life of the Plan. In addition it is considered that there are other more suitable lands available for development.

2. It is considered that there are sufficient policy objectives within Volume 1, Chapter 5 (Economy and Employment) and Chapter 6 (Tourism) of the draft Louth CDP 2021-2027 to encourage and support the development of employment and tourism facilities throughout the County including Termonfeckin, it is not considered appropriate to replicate these within individual settlement plans. Furthermore, it is not considered necessary to zone particular sites within Termonfeckin as IU Tourism and Leisure. Any application for same is welcomed and shall be considered in accordance with TER 7 as well as, the Development Management Guidelines outlined in Volume 1, Chapter 13.

It is considered appropriate to update Table 4.1 / Section 4.9 of the Termonfeckin's written statement to include the pitch and putt course and the caravan/mobile home parks nearby. Section 4.6 states that "the Council will continue to support measures, which enhance permeability and ease of access including the provision of a footpath from village centre towards Seapoint", this statement does not preclude other walking routes

Chief Executive's Recommendation:

Amend Table 4.1 / Section 4.9 of the Termonfeckin's written statement to include the pitch and putt course and the caravan/mobile home parks nearby.

Submission No:	LCDP DR193
Submitted By	Brady Hughes on behalf of Tracy and Claudine Flynn
Theme (s):	Rezone Termonfeckin, Core Strategy, Wording, Flooding
Map showing lands subject to Submission:	
	Map removed as per agent 05/02/2021
Summary of Submission:	

Submission requests the following:

1. The written statement for Termonfeckin fails to set out a comprehensive vision for Termonfeckin. The County Development Plan should include a series of objectives and implementation measures setting out how Termonfeckin can achieve its tourism and job growth potential including the identification of appropriate sites. A comprehensive vision statement should be provided in the written statement for Termonfeckin in this regard.
2. Housing Allocations for Self-Sustaining towns (Termonfeckin, Tullyallen, Clogherhead, Carlingford, and Castlebellingham/Kilsaran) are too small, only 5% of the county total. The Housing Allocation for smaller settlements and the open countryside amounts to 15%. Growth targets for Self Sustaining Growth Towns should be reduced from approximately 40% and the growth targets Termonfeckin and other level 3 settlements increased accordingly.
3. Termonfeckin's Housing Allocation of 41 units within the plan period is disproportionately low when compared with other Level 3 settlement towns. The Housing Allocation for Termonfeckin should be increased to give Termonfeckin equal potential for growth to the other Level 3 settlements like Castlebellingham and Tullyallen.
4. The A2 zoned land in Termonfeckin is very unlikely to deliver the required numbers, and additional appropriately located lands should be zoned for mixed uses including residential purposes.
5. A statement should be provided to allow for flexibility in relation to inaccurate flood mapping and allow for the consideration of flood path modelling and evidence-based justification accompanying an application to build in areas identified on the land use zoning map for the settlement as being at risk.
6. Land Use Zoning Map/Composite Map to be amended as shown above, this will result in an additional gross area of 0.86ha B1 zoned land for village centre development. The development boundary should be extended to include our client's lands as above and the lands zoned for mixed use development. This would accommodate additional tourist accommodation on the site, some residential development in the heart of the village, a developed Riverside park and potentially a site for a remote working/digital hub facility or other appropriately scaled employment uses (indicative layout provided).

In Support:

Background

Our clients are the owners of a public house with guest accommodation and lands at Termonfeckin Co. Louth; and they have a particular interest in the compact growth and development of facilities at Termonfeckin. Our client is concerned that due to the lack of available serviced zoned land at the centre of the Village

Vision for Termonfeckin

An analysis of Termonfeckin's written statement was undertaken emphasizing the following:

- The Self-Sustaining Towns such as Carlingford, Tullyallen, Clogherhead, and Termonfeckin, experienced higher levels of growth than some larger settlements,
- The Jobs / Worker Ratio for the settlement is 0.32, the town is not in fact self-sustaining,
- Section 4.2 lists the opportunities for Termonfeckin however it doesn't say how these opportunities might be realised, there is no vision in relation to tourism potential,
- Section 4.9 of the Termonfeckin written statement mentions the abundance of community facilities however it does not include the pitch and putt course and the caravan/mobile home parks nearby nor the walking routes through the housing development at Sea Point golf club, An Grianan and linking with the Town centre via the sea point road,
- No site nor strategy has been identified in relation to a remote working hub (Section 4.4), and
- The written statement for Termonfeckin fails to set out a comprehensive vision, the aims and objectives are un-ambitious and will not result in the sustainable growth.

There is no service or infrastructure deficit in Termonfeckin thus Termonfeckin is considerably different to other Level 3 settlements such as Tullyallen and Clogherhead. Furthermore both perform considerably worse than Termonfeckin from a Job/worker ratio (0.2 and 0.17 respectively) yet have multiples of Termonfeckin's housing allocation (139/115 Versus 41). No explanation is provided

Core Strategy and Housing Allocations

A table was devised summarising the draft Louth CDPs 2021-2027 core strategy approach, an analysis of same concludes:

- Population of the Regional Growth Centres is to increase by nearly 20%,
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- Populations of Self Sustaining Towns only increase by 13,8%,
- 11% of the total county housing allocation is set aside for one off houses this figure is bigger than housing allocation for the Level 4 and Level 3 settlements combined, which is contrary to national and regional policies,
- Housing Allocations for Self-Sustaining towns (Termonfeckin, Tullyallen, Clogherhead, Carlingford, and Castlebellingham/Kilsaran) are only 5% of the county total, and
- The Housing Allocation for smaller settlements and the open countryside amounts to 15% of the overall projected allocations.

The role of Level 3 settlements is outlined; to cater for rural housing needs, provide a viable alternative to one-off housing, provide a range of different development types including self-serviced site, avoid sprawl and encourage compact growth. Section 2.2, NPO's 6 and 19 of the NPF are specially mentioned in relation to the viability of smaller towns and rural settlements. It is stated that Termonfeckin can play an important role as an alternative location for residential growth in open countryside.

Section 4.8 (RPO 4.8) of the RSES's identify most of County Louth as being an area under strong urban influence. Section 3.17.2 of the Draft CDP requires that persons living in the area demonstrate a 'social need'. Tables 3.4 and 3.5 of the draft Louth County Development Plan 2021-2027 do not set out what constitutes a 'social need'. This is contrary to national and regional policy.

It is suggested that LCC reconsider Housing Allocations to increase the level of residential development in Level 3 Settlements at a closer rate to that of the Level 2 and Level 1 settlements and that the housing allocations for one-offs should be reallocated to settlements with a suitable level of social and community infrastructure, piped public services and public transport services such as Termonfeckin this would be in accordance with NPO 6 and 19 of NPF.

Furthermore, Termonfeckin's Housing Allocation of 41 units within the plan period is disproportionately low when compared with other Level 3 settlement towns- the joint lowest of the five Level 3 settlements, with the second highest population. It seems that the housing allocation is limited because of extant permission for 96 units, however 70 of these are related to a single developer thus controlling the market.

Potential for Residential Development on A2 Zoned Land

A study of the of the 4 sites zoned as Residential New (RN) was undertaken and the constraints for each site outlined, it was concluded that they have the potential to deliver a maximum of 26 units, and it is noted that whilst being zoned since 2004, none have any planning history. The A2 zoned land in Termonfeckin is very unlikely to deliver the required numbers, and additional appropriately located lands should be zoned for residential purposes thus it is stated that the site should be rezoned to Residential and Open Space

Flood Zones

The land use zoning map for Termonfeckin includes flood Zones A and B, it is out of date and shows an incorrect alignment of the river through our client's property CFRAM map provided showing previous and existing alignments shown. A statement should be provided in relation to the inaccurate and out of date flood mapping. The statement should ensure that the planning authority can consider appropriate flood path modelling and evidence-based justification.

Chief Executive's Response:

It is considered that there are sufficient policy objectives within Volume 1, Chapter 5 (Economy and Employment) and Chapter 6 (Tourism) of the draft Louth CDP 2021-2027 to encourage and support the development of employment and tourism facilities throughout the County including Termonfeckin, it is not considered appropriate to replicate these within individual settlement plans.

Furthermore, it is not considered necessary to zone particular sites within Termonfeckin as I1 Tourism and Leisure. Any application for same is welcomed and shall be considered in accordance with TER 7 as well as, the Development Management Guidelines outlined in Volume 1, Chapter 13.

Section 5.9 and Policy Objective EE22 of the draft Louth CDP 2021-2027 support and encourage the provision of co –working facilities and digital hubs, it is not deemed appropriate to identify lands within Termonfeckin for same however any application is welcomed and shall be considered in accordance with TER 6 as well as, the Development Management Guidelines outlined in Volume 1, Chapter 13.

It is considered appropriate to update Table 4.1 / Section 4.9 of the Termonfeckin’s written statement to include the pitch and putt course and the caravan/mobile home parks nearby. Section 4.6 states that “the Council will continue to support measures, which enhance permeability and ease of access including the provision of a footpath from village centre towards Seapoint”, this statement does not preclude other walking routes.

Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand. It is considered that the population and housing allocation for Termonfeckin during the life of the Plan is reasonable, taking account the position of the settlement in the settlement hierarchy, recent patterns of development in the area, and national and regional policy.

A review of the lands identified as ‘New Residential’ development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated. Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered. The other 2 areas of ‘New Residential’ land in the town will facilitate small scale infill developments. Taking this into account an additional area of land for residential development has been identified in Termonfeckin to ensure there are sufficient lands available to meet the projected population. See the response to submission no.741 for further details.

With regards to the issue raised regarding the Flood Zones in the submission there is no map associated with the submission therefore it is unclear what lands are being referred to.

Chief Executive’s Recommendation:

No Change

Submission No:	LCDP DR237
Submitted By	Jerome McEvoy
Theme (s):	Rezone Termonfeckin
Map showing lands subject to Submission:	



Summary of Submission:

Lands are designated as Rural Policy Zone 2 in Draft Louth County Development Plan 2021-2027 proposed that land be zoned for the purpose of low density housing for the development of single sites.

In Support:

My home, which was built in 1989, is located at the southern end of this field which has subsequently been taken into the settlement boundary. The land in question has the following services passing its boundary: Public sewerage, public water main, gas, electricity, fibre broadband. There is access to land inside the 50 km/h speed limit zone.

Chief Executive's Response:

Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand. It is considered that the population and housing allocation for Termonfeckin during the life of the Plan is reasonable, taking account the position of the settlement in the settlement hierarchy, recent patterns of development in the area, and national and regional policy.

A review of the lands identified as 'New Residential' development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated.

Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered. The other 2 areas of 'New Residential' land in the town will facilitate small scale infill developments. Taking this into account an additional area of land for residential development has been identified in Termonfeckin to ensure there are sufficient lands available to meet the projected population. See the response to submission no.741 for further details.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy.

The subject lands are outside the development boundary of Termonfeckin to the north of the settlement. Their inclusion would result in a pattern of sprawl which would be detrimental to the overall character of the settlement.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR238

Submitted By

Ann McEvoy

Theme (s):

Rezone Termonfeckin

Map showing lands subject to Submission:



Summary of Submission:

Lands are designated as Rural Policy Zone 2 in Draft Louth County Development Plan 2021-2027 proposed that land be zoned for the purpose of low density housing for the development of single sites.

In Support:

My home, which was built in 1989, is located at the southern end of this field which has subsequently been taken into the settlement boundary.

The land in question has the following services passing its boundary: Public sewerage, public water main, gas, electricity, fibre broadband. There is access to land inside the 50 km/h speed limit zone.

Chief Executive's Response:

Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand. It is considered that the population and housing allocation for Termonfeckin during the life of the Plan is reasonable, taking account the position of the settlement in the settlement hierarchy, recent patterns of development in the area, and national and regional policy.

A review of the lands identified as 'New Residential' development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated. Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered. The other 2 areas of 'New Residential' land in the town will facilitate small scale infill developments. Taking this into account an additional area of land for residential development has been identified in Termonfeckin to ensure there are sufficient lands available to meet the projected population. See the response to submission no.741 for further details.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy.

The subject lands are outside the development boundary of Termonfeckin to the north of the settlement. Their inclusion would result in a pattern of sprawl which would be detrimental to the overall character of the settlement.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR356
Submitted By	Matthew McEvoy.
Theme (s):	Rezone Termonfeckin
Map showing lands subject to Submission:	



Summary of Submission:

Include lands to the north of Termonfeckin with Settlement Boundary.

In Support:

- There has been no extension to the Termonfeckin village boundary.
- Planning permission has been refused previously.
- Family land for over 50 years, submitter and siblings would like to build thereon.
- Lands are accessible to mains sewage, water, and mains gas and electric.

Chief Executive's Response:

Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand. It is considered that the population and housing allocation for Termonfeckin during the life of the Plan is reasonable, taking account the position of the settlement in the settlement hierarchy, recent patterns of development in the area, and national and regional policy.

A review of the lands identified as 'New Residential' development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated. Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered.

The other 2 areas of 'New Residential' land in the town will facilitate small scale infill developments. Taking this into account an additional area of land for residential development has been identified in Termonfeckin to ensure there are sufficient lands available to meet the projected population. See the response to submission no.741 for further details.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy.

The subject lands are outside the development boundary of Termonfeckin to the north of the settlement. Their inclusion would result in a pattern of sprawl which would be detrimental to the overall character of the settlement.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR619
Submitted By	Michael McEvoy
Theme (s):	Rezone

Map showing lands subject to Submission:



Summary of Submission:

Include lands at Duffs Farm within the Settlement Limit of Termonfeckin and re-zone to residential.

In Support:

- The draft Plan recognises the importance of striking a balance between facilitating residential development in the open countryside and reinvigorating towns and villages.
- It supports the implementation of a "New Home in Small Towns and Villages"
- The lands are partially within the speed limit of the village and have main gas, water, and sewerage available and are within 500 metres of the centre of the village.
- Require rezoning for family – would enable them to build homes and live within centre of Termonfeckin.

Chief Executive's Response:

Termonfeckin is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy, the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand. It is considered that the population and housing allocation for Termonfeckin during the life of the Plan is reasonable, taking account the position of the settlement in the settlement hierarchy, recent patterns of development in the area, and national and regional policy.

A review of the lands identified as 'New Residential' development in Termonfeckin was carried out and it is accepted that there are centrally located lands adjacent to the town centre that includes a Protected Structure (Site 2 of the Infrastructure and Land Use Assessment) on which the quantum of lands likely to be delivered would be lower than that normally anticipated. Any development of these lands would have to be cognisant of the importance character and setting of this Protected Structure in the central area of the town, which is likely to impact on the quantum of residential units that can be delivered. The other 2 areas of 'New Residential' land in the town will facilitate small scale infill developments. Taking this into account an additional area of land for residential development has been identified in Termonfeckin to ensure there are sufficient lands available to meet the projected population. See the response to submission no.741 for further details.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy.

The subject lands are outside the development boundary of Termonfeckin to the north of the settlement. Their inclusion would result in a pattern of sprawl which would be detrimental to the overall character of the settlement.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR638
Submitted By	David Millar on behalf of Michael McEvoy
Theme (s):	Rezone Termonfeckin
Map showing lands subject to Submission:	



Summary of Submission:

Land (12.2ha) within the Settlement Limit of Termonfeckin and re-zone to facilitate: Light industry, Residential Housing – High Density and Low Density, Playground and Pre-School/Crèche.

- In support of Light Industry zoning, an excerpt from the 'Economy and Employment' section of Termonfeckin Settlement Plan is provided it is stated that the site is within walking distance of the village centre, public transport and other employment generators.
- In support of the residential zoning, it is stated that there is one housing development in Termonfeckin which has limited variety of housing type and a single developers reduces competition.
- Poor planning does not provide a proper balance of housing stock for first time buyers, those wishing to downsize, single persons requiring one and two bedroom homes and low density development for those who want to build own homes.
- The site is perfectly suited for a centrally located playground.
- Existing pre-school in old community hall is not fit for purpose. The site is in proximity to village centre.
- Rezoning would be in accordance with the following Policy Objectives TER 1, TER2, TER3, TER4 and TER5.
- Only 41 new residential units are allocated to Termonfeckin in the Draft Louth CDP 2021-2027, this is too low. Termonfeckin has the joint lowest allocation of the five Level 3 settlements, despite having the second highest population.
- Termonfeckin is in close proximity to Drogheda and there is a strong demand for housing. The low allocation will not allow Termonfeckin to reach its potential as Self Sustaining Town.

Chief Executive's Response:

The subject lands are outside the development boundary of Termonfeckin to the north of the settlement. Their inclusion would result in a pattern of sprawl which would be detrimental to the overall character of the settlement.

Furthermore the lands are located c.500m from the village centre with no footpath for approximately half the distance in terms sustainable transport and road safety , it is considered that they would be not be suitable for a playground or crèche facility.

It is acknowledged that there is no land in Termonfeckin zoned E1 General Employment notwithstanding this, it is considered that the lands are located along a Class 2 Road, detached from the village centre and immediately adjoining residential development, as such they would not be suitable for light industrial development.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR305
Submitted By	Declan McKeown
Theme (s):	Rezone Tullyallen

Map showing lands subject to Submission:



Summary of Submission:

Subject lands are presently located with Rural Policy Zone 1, it is requested that the boundary of Tullyallen is extended to include this site (see above):

In Support:

- The site immediately abuts the proposed settlement boundary for Tullyallen and the on-going development at Allenwood.
- All water services infrastructure for this housing development were designed and installed taking into account any possible future expansion into these lands.

Chief Executive's Response:

Tullyallen is identified as a Self-Sustaining Town in the settlement hierarchy of the Draft County Development Plan. The focus of growth in the town during the life of this Plan will be one of consolidation.

As advocated in national and regional policy the future growth of self-sustaining towns is not to be driven by unsustainable, commuter driven development. The focus of population and residential growth is to be in the higher tier settlements with growth in the smaller settlements based on meeting local demand.

National and Regional policy requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. In this regard it is considered that there are sufficient undeveloped lands within the development boundary of Tullyallen to meet the projected housing requirements as set out in the Core Strategy.

The subject lands are outside the development boundary of Tullyallen to the north-west of the town centre. They are irregular in shape and would result in the boundary extending further north than the existing boundary potentially creating a pattern of sprawl. Tullyallen is situated in a visually sensitive location within the Boyne Valley and King Williams Glen area. Any future extension to the development boundary must consider the potential impact on this landscape.

There is no requirement to identify any additional lands for development in Tullyallen. The zoning of the subject lands would result in the quantum of residential lands available being in excess of that required to meet the housing demand for Tullyallen as set out in the Core Strategy.

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. The irregular shape of the lands would result in the beginning of a pattern of sprawl north of the existing development boundary. It is therefore recommended that no change is made to this land use zoning.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR575
Submitted By	Diarmuid and Robert Byrne
Theme (s):	Rezone Tullyallen, Rural Policy Zone 1
Map showing lands subject to Submission:	



Summary of Submission:

1. Request to extend boundary to include lands shown as yellow on map.
2. Apply qualifying criteria in Rural Policy Zone 2 to Rural Policy Zone 1

In Support:

- We own a 1.5ha site in Tullyallen – located within Zone 1 and within Rural Policy Zone 1 of the draft Plan.
- Request to extend village boundary to include lands outlined in yellow.

Letter from son submitted:

- In terms of qualifying criteria, if the provisions of Rural Policy Zone 2 were applied to Zone 1, (people who are required to live in rural area for exceptional health reasons) it would help the submitters case.
- Lands are located close to a bus route and Tullyallen village where there are amenities nearby.
- Planning permission on this land would allow submitter and brother to live rurally.
- Submitter has lived locally, attended school locally and played for local Gaelic Club. Details provided regarding submitters partner.
- Draft Plan discriminates against people who have who less than 3ha for 10 years.

Chief Executive's Response:

There is no requirement for additional residential land in Tullyallen, please refer to Point 1 of DR 0305.

The R168 provides a definitive boundary to the east of settlement. The subject lands are located to the east of the R168 beyond the development boundary of Tullyallen.

They are irregular in shape and would result in the boundary extending to the other side of the R168 thereby exacerbating the pattern of sprawl. The lands are rising and located within the Ridgeline to the north of Brú na Bóinne, which frames the views within and from the World Heritage Site any future extension to the development boundary must consider the potential impact on this landscape.

If zoned the subject lands would exacerbate the pattern of sprawl to the east of the existing development boundary within a sensitive landscape and would be contrary to national and regional planning policy. It is therefore recommended that no change is made to this land use zoning.

Please refer to Rural Policy General Composite Response in relation to qualifying criteria.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR798
Submitted By	Tony Coffey
Theme (s):	Land Use Zoning Tullyallen
Map showing lands subject to Submission:	
	
Summary of Submission:	
1. Request that subject site A is rezoned to residential, to specifically provide housing for the elderly.	
In Support:	
• Facilities in vicinity of the site are outlined. • Mature tree boundary will provide screening and privacy (photos provided). • Development of the site for a well-connected community provision, housing for the elderly, is in compliance with Policy Objective TUL 1. • Population statistics and elderly care accommodation statistics demonstrate that Tullyallen is underprovided for. • Facility will also bring long term employment opportunities. • Subject site is in the historic centre of the village (map provided). Tiered assessment shows that the site is in the centre of the village. • Rezoning of the site would be in accordance with HOU 12.	



- Development plan has identified six principles for housing an ageing population, it is stated that the rezoning of the lands in Tullyallen would be in compliance with same: Ageing in place, promoting sustainable lifetime housing, using assistive technology, staying socially connected: and working together.
2. Request that subject site B is re- zoned to tourism.

In Support

- Tourism is an economic driver.
- Site B bounds King Williams Glen and Tullyallen's Belnumber walk.
- There is a lack of tourism hospitality facilities, particularly for campervan parks, within the entire county, but particularly in South Louth
- Tourist attractions in the vicinity are listed.
- Rezoning would be in compliance with TOU4, TOU5, TOU29, TOU30 and TUL 22 ,
- Indicative layout and photos showing examples of campervan parks are provided.

Chief Executive's Response:

1. Site A

- Statistics regarding ageing population are noted.
- There is no requirement for additional residential land in Tullyallen, please refer to Point 1 of DR305.
- It should also be noted that there are sufficient undeveloped lands within the development boundary of Tullyallen to meet the projected housing requirements for all age cohorts, it is not necessary to zone additional lands specifically for elderly persons.
- The subject lands are located to the south of Tullyallen, outside the settlement boundary and would result in the boundary extending further southward, potentially creating a pattern of sprawl. Tullyallen is situated in a visually sensitive location in an Area of High Scenic Quality and within the Ridgeline to the north of Brú na Bóinne, which frames the views within and from the World Heritage Site. Any future extension to the development boundary must consider the potential impact on this sensitive landscape.

2. Site B

- TOU 29 of the draft Louth CDP 2021-2027 encourages parking and camping sites to locate within existing settlements except in accordance with TOU 30 where there is a justifiable tourism need and this is balanced against environment, social and cultural aspects etc.
- In this instance the subject lands are located to the south west of Tullyallen detached from its settlement boundary. They are situated within an Area of High Scenic Quality, below the Ridgeline to the north of Brú na Bóinne, which frames the views within and from the World Heritage Site. Furthermore, the site immediately adjoins the Proposed Natural Heritage Area, King Williams Glen. Given the highly sensitive nature of the landscape it is not considered appropriate to rezone these lands to I1 Tourism and Leisure.

Chief Executive's Recommendation:

No Change



Section 2f: Chief Executive's Summary, Response and Recommendation on Zoning Submissions – Small Towns & Villages

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No:	LCDP DR196
Submitted By	Brady Hughes on behalf of Olan McNeece
Theme (s):	Rezone Baltray
Map showing lands subject to Submission:	



Summary of Submission:

Rezoning of lands (1ha) at Ballydonnell, Baltray, Co. Louth from Rural Policy Zone 2 to Residential New (RN)

In Support:

The subject lands were included within the settlement boundary of a Local Area Plan for Termonfeckin and Baltray before they were treated as separate settlements. Planning Permission was granted for a dwelling and outline permission 2 additional houses (Planning Ref: 07/1398). Due to the downturn the detached property was constructed but never completed and site development works for the remaining two sites commenced. The site was de-zoned during the county development plan and Local Area Plan review processes. The development was subsequently included in the Unfinished Housing Development Survey carried out in 2011 by LCC.

It is acknowledged that there are numerous examples of this type of unfinished housing scheme built on lands that, perhaps un-necessarily, had been zoned for residential use early in the 2000's. However in this instance a significant investment was made on foot of the zoning. Should the developer wish to complete the scheme, it will be subject to local needs requirements and significant limitation on occupancy.

The NPF and RSES support making best use of serviced lands and for infill developments on brownfield sites, Section 9.3 of RSES is specifically mentioned. It is considered that the subject lands fall under the definition of brownfield/infill. It is requested that the unfinished housing developments to be zoned as Existing Residential A1, and that the Land Use Zoning Map for the settlement of Baltray be amended.

Chief Executive's Response:

Baltray is a coastal village categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 132 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Baltray in creating a vibrant and sustainable rural community. The growth strategy for Baltray during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

In this regard it is considered that there are sufficient undeveloped lands within the settlement boundary of Baltray to meet the projected housing requirements as set out in the Core Strategy. In addition there are opportunities to provide housing on infill and brownfield lands in the central areas of the village. This is considered sufficient to meet the residential demands for the village during the life of the Plan.

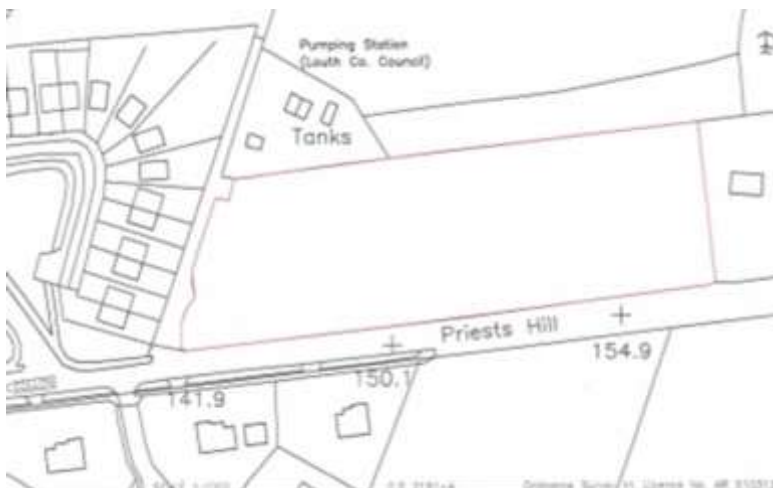
The identification of any additional lands for residential development would result in the quantum of residential lands available being in excess of that required to meet the projected population increase and is contrary to the policy objective NPO 9 which limits population growth to below 30% of existing population. This could potentially result in a disproportionate increase in the population which could result in an unsustainable pattern of development that could place a strain on existing local services whilst also altering the character of the village. Such a residential and population increase and pattern of development would be contrary to national and regional policy and could undermine the growth strategy for the County as set out in the Draft Plan.

The subject lands are outside the development boundary of Baltray to the north 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. Furthermore, the zoning of the submission lands for residential use would contribute to the convergence of settlements of Termonfeckin and Baltray.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR169
Submitted By	John Dineen on behalf of Raymond Argue
Theme (s):	Re- zoning
Map showing lands subject to Submission:	



Summary of Submission:

Request that lands at Priests Hill, Collon be rezoned to New Residential (RN)

In Support:

- Site is located close to village of Collon and is fully serviced, it would be a logical extension to existing zoned lands,
- Proposal for 22 OAP bungalows and a medical centre
- There is a strong demand for housing in the Collon area and this would reduce the demand for 'One off' housing.
- Sightlines are achievable.
- Lands are located close to bus route and in easy reach of the M1 and N2

Chief Executive's Response:

Collon is categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 846 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Collon in creating a vibrant and sustainable rural community. The growth strategy for Collon during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

In this regard it is considered that there are sufficient undeveloped lands within the settlement boundary of Collon to meet the projected housing requirements as set out in the Core Strategy. In addition there are opportunities to provide housing on infill and brownfield lands in the central areas of the village. This is considered sufficient to meet the residential demands for the town during the life of the Plan.

The identification of any additional lands for residential development would result in the quantum of residential lands available being in excess of that required to meet the projected population increase and is contrary to the policy objective NPO 9 which limits population growth to below 30% of existing population. This could potentially result in a disproportionate increase in the population which could result in an unsustainable pattern of development that could place a strain on existing local services whilst also altering the character of the village. Such a residential and population increase and pattern of development would be contrary to national and regional policy and could undermine the growth strategy for the County as set out in the Draft Plan.

The subject lands are outside the development boundary of Collon to the 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.

Furthermore Collon is situated in a visually sensitive location in Collon Uplands Area of High Scenic Quality. Any future extension to the development boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR342

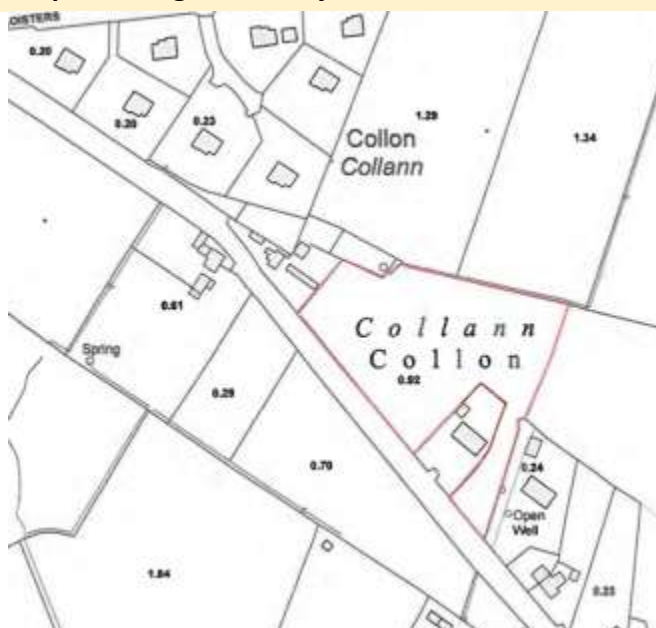
Submitted By

Robert Kenny on behalf of John Dunne

Theme (s):

Rezone Collon

Map showing lands subject to Submission:



Summary of Submission:

Request that the subject site (0.1ha) is included with in the Settlement boundary of Collon and rezoned to New Residential (A2)

In Support:

- The lands are located close to the centre of the village and are serviced.
- Very little land is zoned for new residential development in Collon Village
- Given the proposed restrictions on the construction of single houses in the countryside and the policy of diverting such housing to development centres, it would appear that significant additional zoned lands are required for low density individual houses on large sites in development centres such as Collon.
- The subject lands would be very suitable for this type of development.

Chief Executive's Response:

There is no requirement for additional residential land in Collon, please refer to DR 0169.

The subject lands are outside the development boundary of Collon 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.

Furthermore Collon is situated in a visually sensitive location in Collon Uplands Area of High Scenic Quality. Any future extension to the development boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR386
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Submitted By	John Spain Associates in behalf of Gem Construction
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Theme (s):	Rezone Collon
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Map showing lands subject to Submission:	
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Summary of Submission:

Rezone lands (2.12ha) to 'New Residential' (Density of 20 to 30 units/ha)
or
Consider a low-density residential zoning which would provide an alternative to urban generated housing in the countryside, having regard to the recommendations of the National Planning Framework 2018 and the Sustainable Residential Guidelines 2008.

Brochure prepared by McKevitt King Architects indicating development options.

In Support:

Site Location

Edge of village and readily serviced, not located in an ACA or ZAP, lands aren't prone to flooding. Existing residential to south and east. Planning permission for 23no units granted under 07/131. Extension of duration refused as lands no longer zoned residential under the Louth CDP 2009-2015 (13/90).

Draft Louth County Development Plan 2021-2027

Collon is designated as a Level 4 Settlement. Details are provided regarding projected population growth, in the Level 4 settlements:

Small Towns and Villages

As per Section 2.17 of the draft Plan it is noted that Collon has the 2nd strongest employment base of all Level 4 settlements.

Rural Housing

Sections 2.4.4 and 2.66 of the draft Louth CDP 2021-2027 are noted. It is stated that the subject lands would consolidate the settlement and deliver compact growth

Other Relevant Policies in the Draft Plan

Policy Objectives SS54, 55 and 62 are cited. The site is bounded by residential development. The population of Collon grew by 10% of the 2011-2016 intercensal period, a similar growth rate is assumed, and only 1 no. residential unit has been granted permission since 2015.

Housing within Collon

Subject is an infill site and would create a more cohesive townscape. Policies COL 1, 2 and 3 and Section 2.3.2 of the draft Louth CDP 2015-2021 are specifically mentioned in relation to the subject site.

Over Relevant Planning Policy Documents.

A detailed overview of national and regional planning policies has been undertaken. National Policy Objective 18a, 18b of the NPF are specifically mentioned as is RPO 4.78 of the RSES. Section 6 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) 2009 (SDRUA) is also cited.

Amendments to the draft Louth County Development Plan 2021-2027

Request to introduce a New Residential or Low Density Residential zoning for the following reasons:

- Edge of centre site location.
- Previously zoned residential and previous granted permission for 23 no. units.
- Would consolidate the settlement through either a medium density residential zoning (20-35 units /ha) ; or
- Provided for a low density residential zoning (c. 10 units per hectare) thereby providing serviced sites in the centre of Collon as an alternative to urban generated housing in the Countryside.

Request No.1

Medium density option for the site as per brochure prepared by McKevitt King would accord with SDRUA. The site is considered to be infill opportunity, its zoning would be consistent with Section 2.17 of the draft Louth CDP 2021-2027, it has no physical constraints and the landowner is an established developer. In accordance with the Tiered Zoning approach the lands are considered to fall under Tier 1

Furthermore, other zoned lands in Collon have not been brought forward, are not serviced and the lands are sequentially less suitable. Moreover access to subject lands would be closer to Main Street. In accordance with Section 2.4.3 of the draft Louth CDP 2021-2027 and page 50 of the RSES which pertain to the delivery of housing land, the Planning Authority is requested zone lands as Residential New

Strategic Reserve Sites

It is stated that the existing strategic reserve sites in Collon would be considered as Tier 2, one is partly located within a flood zone and the other experiences a significant drop in levels. The subject site is considered more appropriate than other lands presently zoned RE and SR in Collon.

Core Strategy Population Figures

The core strategy population figures for Level 4 Settlements is 785 people, with a housing allocation of 414 units for the 2021-2027 period. There is no further breakdown provided as to how these 414 units are to be distributed. The subject site has the potential to accommodate 40 units or 10% of the total housing allocation for the Level 4 settlements in the County. Given that 53% of population growth over the intercensal period was located in lower tier settlements, and that the population of Collon grew 10.1% over this same period, the introduction of a 'New Residential' zoning on the subject site will help meet the 22% population growth allocation for 'Self-Sustaining towns, towns and villages and the rural area'.

Planning History and Zoning – as per above

Request No.2 Low Density Residential Zoning:

Provision of Low Density Residential Zoning would offer an alternative to urban generated housing which is in accordance with Section 6 of the SDRUA guidelines, NPO 18b of the NPF and Policy Objectives CS 15 and CS 16 of the draft Louth CDP 2021-2027. The Wicklow CDP 2016-2022 is cited. The Development Strategy Brochure by McKeivitt King Architects demonstrates potential layout.

Chief Executive's Response:

Only the southern part of the site would be considered as infill development, notwithstanding this, there is no requirement for additional residential land in Collon, please refer to DR 0169.

It is considered that lands zoned Residential New within Collon (A2) are appropriately zoned.

Furthermore, the subject lands are outside the development boundary of Collon to the north west of the settlement. The inclusion of the site in its entirety 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.

Additionally Collon, is situated in a visually sensitive location in Collon Uplands Area of High Scenic Quality. Any future extension to the development boundary must consider the potential impact on this sensitive landscape.

The 'Development Strategy Brochure' is noted but as previously stated there is no requirement for additional residential land in Collon.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR590
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Submitted By	A1 Design Services on behalf of Boyne Adventures Limited
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Theme (s):	Rezone Collon
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Map showing lands subject to Submission:	
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Summary of Submission:	
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Include lands (5.95ha) at Oriel Road, Collon within settlement boundary

In Support:

- Access within the 80 kph speed limit.
- Lands not currently zoned.
- Foul sewage in village has limited capacity, therefore it is proposed to provide sites with their own waste water treatment system - other examples of same are provided.
- Cluster arrangement is proposed.
- Site is close to village centre and associated amenities, adjacent to Doire Beag housing scheme, street lighting and footpath are available. Footpath will be provided along boundary.
- Gardens will have sufficient private open space and there shall be sufficient car – parking on site.
- Description of layout and proposed house design is provided, they will have an ‘A’ energy rating and maximize solar gain.
- Rainwater will be discharged to soakaways.
- Water supply is available.
- Sufficient public open space will be provided with potential link to river.
- No development will take place on lands prone to flooding.
- Site is not located within an ACA nor ZAP.

Chief Executive’s Response:	
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There is no requirement for additional residential land in Collon, please refer to DR 0169.

Furthermore, the subject lands are outside the settlement boundary of Collon to the west of the village. The inclusion of the site 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.

Additionally Collon, is situated in a visually sensitive location in Collon Uplands Area of High Scenic Quality. Any future extension to the development boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR592

Submitted By

O'Hanlon Property on behalf of the Bannon Family

Theme (s):

Rezone Collon

Map showing lands subject to Submission:



Summary of Submission:

Rezone (1.85ha) to the south of Drogheda Road and East of School Lane to Residential

In support:

- There are limited opportunities for Collon to grow, this is a natural extension to the town and in proximity to a number of amenities.
- Residential development would complement existing development and would counteract development to the northern side of the Drogheda Road. Site could cater for approximately 40units.
- Water and sewage is accessible.
- Zoning of site would allow people to live in native town following pandemic.

Chief Executive's Response:

There is no requirement for additional residential land in Collon, please refer to DR169.

Furthermore, the subject lands are outside the settlement boundary of Collon to the south east of the village. The inclusion of the site 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.

Additionally Collon, is situated in a visually sensitive location in Collon Uplands Area of High Scenic Quality. Any future extension to the development boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR739

Submitted By

EHP Services on behalf of David Keane

Theme (s):

Rezone Collon

Map showing lands subject to Submission:



Summary of Submission:

Request rezoning from Rural Policy Zone 1 to Residential New (A2).

In Support:

An analysis of the NPF been undertaken, Section 4.5, NPO 3a, 3c and 33 are specifically cited. A summary of the RSES has also been provided, RSO 2, RPO's 4.78 and 4.83 are highlighted. The Guidelines to Planning Authorities on Sustainable Residential Development in Urban Areas (2009) are also mentioned and the Louth County Development Plan 2015-2021 in terms of policy SS10.

Justification for Revised Boundary and Rezoning

- In the draft Louth CDP 2021-2027, Collon is classified as a Level 4 settlement in the hierarchy.
- Table 2.14 provides a breakdown of projected population growth and distribution of new housing in each at each tier, a total of 414 units are required in all the Level 4 settlements. Table does not give a breakdown of how many should be provided in Collon.

- The only lands identified in Collon as New Residential have not been subject to any planning applications.
- Relying on these lands is contrary to Policy Objectives SS54 and COL3 of the draft Plan.
- The zoning of the submitters land would address the lack of sufficient lands zoned in Collon and in turn would strengthen existing urban fabric and social cohesion
- Rezoning would be in compliance with Policy Objectives CS14, CS15, CS16 and SS15 of the draft Plan.

Chief Executive's Response:

There is no requirement for additional residential land in Collon, please refer to DR 0169.

It is considered that lands zoned Residential New (A2) within Collon are appropriately zoned.

Furthermore, the subject lands are outside the development boundary of Collon to the east of the settlement. The inclusion of the site in its entirety 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.

Additionally Collon is situated in a visually sensitive location in Collon Uplands Area of High Scenic Quality. Any future extension to the development boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation:

No Change

Submission No.	LCDP DR004
Submitted by:	Genesis Planning Consultants on behalf of Alan Gray.
Theme (s):	Rezone Collon, Additional policy regarding provision of employment facilities in out of centre locations

Map showing lands subject to Submission:



Summary of Submission:

Submission requests that subject lands be included within the settlement envelope of Collon and zoned for employment uses and that, additional policies be provided which would allow employment facilities in out of centre locations.

The submission includes a detailed overview of national, regional and local policy.

Objectives 1c, 5, 6, 7 and 11 as well as Section 4.5 of the NPF are specifically mentioned. Various sections of the RSES and RPO's 4.1, 4.14, 4.18, 4.79, 4.82, 4.83, 6.3, 6.5 and 6.9 are cited. Details regarding policies contained within the LCDP 2015-2021 and the draft Plan are also provided. The submission also refers to pertinent sections of the 'Development Plans, Guidelines for Planning Authorities'.

It is stated that although the majority of economic growth for the County will take place in Dundalk and Drogheda, there is scope of economic opportunities in Level 2 and 3 settlements and this should be reflected in zoning. Collon is designated as a Level 3 Settlement, the incorporation of the subject lands within the settlement limit would facilitate economic growth, promote small scale business and employment in Collon thereby creating balanced socio-economic development and reversing unsustainable commuter patterns.

The submission outlines the key characteristics of the site:

- Lands are positioned in an ideal location to ensure a high quality business part i.e. detached from the village core meaning there will be limited/ no impact on amenity,
- Lands are contiguous with existing business park,
- Lands are currently within Collon's settlement envelope,
- Lands are directly accessible from the existing road infrastructure,
- Lands are serviceable.

It is stated that the lands are strategically important to the overall development of Collon and for employment provision.

Chief Executive's Response:

The lands in question incorporate the parcel of land to the west of Collon which is presently zoned as E1 (General Employment) and an additional portion of land which extends over the Mattock River.

The General Employment (E1) lands to the west of Collon are located along the Kells road, and partly adjoin Collon Business Park. It is considered appropriate that these lands remain zoned for (E1) General Employment as it would enable clustering of enterprise activities which would have economic and employment benefits for Collon and its hinterland. The submission lands incorporate additional to the south of the lands already zoned General Employment. Having regard to the quantum of employment land zoned in Collon, the underdeveloped nature of the site and that fact that it incorporates the Mattock River it is not considered appropriate to re zone these lands to General Employment (E1).

Any applications received on lands zoned 'General Employment' shall be assessed in accordance with Chapter 13, Section 13.19.16 'General Employment' and any applications for employment development in the open countryside shall be assessed in accordance with Chapter 13, Section 13.11.11 'Employment Development in Rural Areas'. It is therefore not considered necessary to provide additional policies in relation to employment facilities in out of centre locations.

Chief Executive's Recommendation

No Change

Submission No:

LCDP DR166

Submitted By

EHP on behalf of Patrick and Sonia Griffin

Theme (s):

Rezone Collon

Map showing lands subject to Submission:



Summary of Submission:

Request that lands shown as Parcel A (8.43ha) & B (6.73ha), Collon are rezoned from General Employment (E1) to Strategic Reserve (L1) or absorbed into Rural Policy Zone 1.

In support:

- Total land zoned as Employment (E1) in Collon is c. 26.76ha. In the draft Louth CDP 2021-2027 Collon is a Level 4 Settlement with a Job: workforce ratio of 0.31, the highest of all Level 4 Settlements, in 2018 the village survey showed that 30% of the commercial property was vacant.
- The quantum of land zoned General Employment (E1) is superfluous to the village's local employment needs and the scale of development is not in keeping with the draft Louth CDP 2021-2027 growth strategy for small towns and villages. Businesses that would be attracted to a business/industrial park are more likely to operate at the national or regional level and would not serve the community in terms of local employment. The scale of these lands would be better suited to a Level 1 or 2 Settlement such as Dundalk, Drogheda or Ardee. Collon's future economic and employment growth can be accommodated within Collon Business Park or within Area C.
- Unnecessary development of Areas A and B would result in urban sprawl, be contrary to the principles of proper and sustainable development and be contrary to Policy NBG 37 which pertains to the protection Area of High Scenic Quality. d
- Development of these lands would result in a traffic hazard and exacerbate road safety issues.

Chief Executive's Response:

The lands at Collon have been designated for Employment purposes for a number of Plan periods, the rationale was based on, 'Locating industry in Louth (2002)'. This document aimed to provide a more even distribution of employment opportunities throughout the County, particularly to the west where it was considered that fewer opportunities were available. Collon was identified as the most suitable settlement due to its strategic location between Dundalk and Drogheda and its proximity to the M1. Three parcels of lands were subsequently identified and zoned accordingly (Parcels A, B & C as shown on the above map).

The site to the west of Collon is located along the Kells Road (Parcel A), and partly adjoins Collon Business Park. It is considered appropriate that these lands remain zoned for (E1) General Employment as it would enable clustering of enterprise activities which would have economic and employment benefits for Collon and its hinterland. Much of the lands associated with the site to the south of Collon along the N2 (Parcel C) have already been developed as Collon Industrial Park and it is therefore considered that the (E1) General Employment zoning should remain in place.

The lands to the south east of Collon (Parcel B) is located on rising land along a narrow Class 2 Road and has not been developed to date. Its development for employment purposes is likely to result in a traffic hazard. Furthermore, the site is located on rising land which would require significant site development works. Additionally, the elevated nature of the site would detract from Collon's rural setting and would adversely impact on views from the Architectural Conservation Area. With regard to the aforementioned, it is considered appropriate that the site B is rezoned to Rural Policy Zone 1.

Chief Executive's Recommendation:

Rezone General Employment lands to the south east of Collon to Rural Policy Zone 1 (Parcel B as per the above map).

Submission No:	LCDP DR190
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Submitted By	Brady Hughes on behalf of Tom Condon
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Theme (s):	Rezone Collon, Wording
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Map showing lands subject to Submission:	
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Summary of Submission:	
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Submission requests the following:

- Rezoning from lands identified in map above from Rural Policy Zone 1 to General Employment, and
- Section 8.4 of the Written Statement for Collon be amended to reflect the existence of Collon Business Park and the 120 full time jobs that exist therein

Background.

Collon Business Park is also home to Fox Pak, G4S, Phoenix Engineering, Collon Vehicle Dismantlers and Waterjet Creations, it employs approximately 120 people in full time.

Land use Zoning

There are three areas in Collon zoned for employment use, but Collon Business Park is not one of them

Written Statement

The Section 8.4 of the Collon Written Statement notes that the Jobs to Worker Ratio in Collon is very low at 0.31 and references the three areas zoned for Employment Uses which have not been successful in terms of economic development and job creation. Collon Business Park is not mentioned even though Condon Engineering and Fox Pak are hi-tech engineering businesses providing employment opportunities. This is a missed opportunity.

Figure 5.1 of Chapter 5 of the Draft Louth CDP 2021-2027 includes data as to how the Jobs: Worker Ratio is calculated. Collon Business Park is not included in that data, even though it has 120 people working there full time. The information is out of date.

PO SS54 of the draft Louth CDP 2021-2027, links the support of the planning authority to balance proportionate development and growth in settlements. The fact that Collon arguably has the highest Jobs: Worker ratio in the county (Bar Level 1 and Level 2 settlements is important information.

It is requested that the Land Use Zoning Map be amended to include Collon Business Park within the settlement boundary and that additional zoning is provided on lands directly to the west of the Business Park to underpin its growth potential, and to allow for its future expansion

It should be noted when quoting the Jobs: Worker Ratio of 0.31 that this information is out of date and does not include the Jobs in Collon Business Park.

Chief Executive's Response:

The site is located within Rural Policy Zone 1 in an Area of High Scenic Quality, to the west of Collon.

Planning permission was granted for the erection of 6no. New industrial/warehouse units under parent permission 05/45 and various alterations to same were also granted permission under planning references; 06/165, 06/795, 07/368, 07/369, 08/512, 08/619, 13/558, 15/556 and 17/28. Retention of an extension of the business park in a southerly direction was granted under planning reference 17/254. Have regard to the planning history of the site and the fact that Collon Business Park is in operation there is no objection in to the rezoning of these lands to General Employment G3. The extent of the re-zoning shall correspond with the planning history of the site.

Having regard to the quantum of land zoned General Employment, the site's location outside the settlement of Collon, within a sensitive landscape, is not considered necessary nor in keeping with the principles of sustainable development to re-zone lands immediately west of Collon Business Park to General Employment.

It is acknowledged that Collon Business Park is not included within Jobs: Worker Ratio not withstanding this, the contribution that Collon Business Park plays in terms of employment generation is noted and there is no objection in principle to mentioning it in the text of Section 8.4 'Economy and Employment'.

Chief Executive's Recommendation:

Re-zone lands to General Employment as per planning history of site, see maps below:



05/45



17/254

2. Volume 2, Section 8.4 'Economy and Employment'.

Include the following: "Employment opportunities are also available at Collon Business Park."

Submission No:	LCDP DR393
Submitted By	Stephen Ward on behalf of John Mulholland
Theme (s):	Rezone Collon
Map showing lands subject to Submission:	



Summary of Submission:

Rezone subject site from Employment General (E1) to Rural Policy Zone 1.

In Support:

- The lands are unrelated to the settlement of Collon. There are no footpaths, public lighting or public transport connections to the village, lands are un-serviced. Development on the lands would endanger public safety.
- The lands are physically and visually separate from any reasonable assessment of the settlement boundaries of Collon Rural Policy Zone 1 should apply.
- The zoned area extends to c8 hectares and this could easily accommodate buildings with an overall footprint of well over 10,000sq.m (100,000sq.ft). The overarching policy is that the village is a Tier 4 settlement where the goal is to facilitate only local services and local employment. Regional planning policy would not promote employment development at this scale in an unserviced rural area. Such levels of employment zoning would be far more appropriate to a regional growth centre such as Drogheda or Dundalk.
- The zoning of that extent of lands is in conflict with the policies of draft Louth CDP 2021-2027, OBJ 1, EMP 1, COL 4, COL 5, and COL19. Furthermore development of these lands would undermine the Green Infrastructure designation.
- The current Louth CDP 2015 -2021 refers to the village's setting within an Area of High Scenic Quality (AHSQ) and the weakening of the urban form on approach roads. Development Control Zone 2 is very restrictive and as per RD34 large scale industrial development would not be considered appropriate.
- The sensitive landscape designation AHSQ is carried through to the new Draft Plan furthermore the site located within Mattock Valley and village contains high no. of protected structures. The road is also an important contributor to the village environment.

Chief Executive's Response:

The lands at Collon have been designated for Employment purposes over a number of Plan periods, the rationale was based on, 'Locating industry in Louth (2002)'. This document aimed to provide a more even distribution of employment opportunities throughout the County, particularly to the west where it was considered that less opportunities were available. Collon was identified as the most suitable settlement due to its strategic location between Dundalk and Drogheda and its proximity to the M1. Three parcels of lands were subsequently identified and zoned accordingly.

The site to the west of Collon is located along the Kells road, and partly adjoins Collon Business Park. It is considered appropriate that these lands remain zoned for (E1) General Employment as it would enable clustering of enterprise activities which would have economic and employment benefits for Collon and its hinterland.

Having regard to the quantum of land zoned for employment purposes throughout the County it is not considered that the zoning of the site to the west Collon for (E1) General Employment would be contrary to either National, Regional or Local planning policy.

The site's location within an Area of High Scenic Quality is noted any application for development on the site must have regard to its sensitive landscape setting.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR401

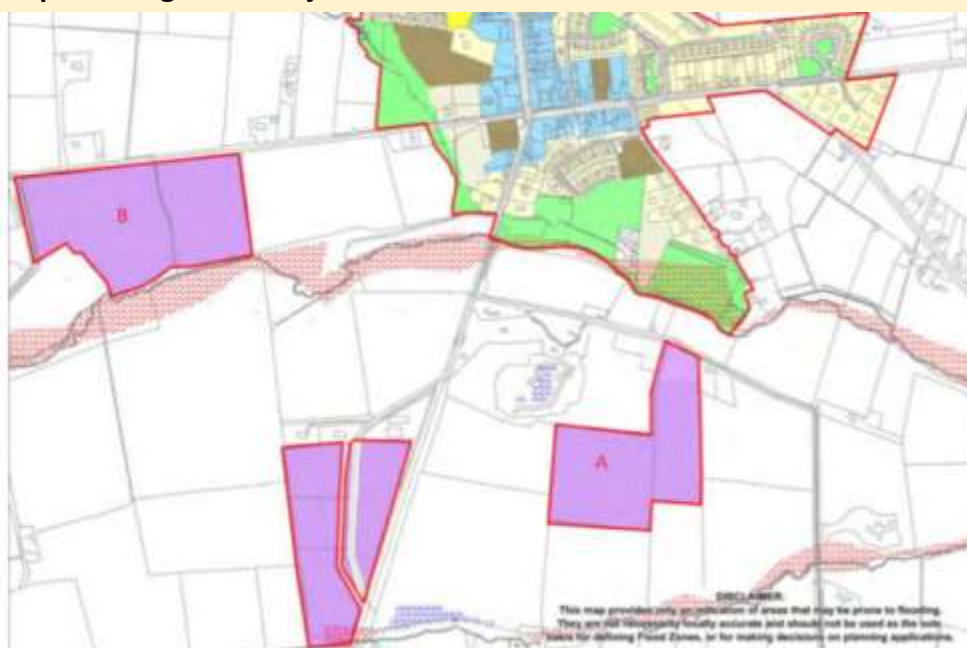
Submitted By

Anthony Murphy

Theme (s):

Rezone Collon

Map showing lands subject to Submission:



Summary of Submission:

Rezone Sites A and B outside Collon from General Employment (E1) to Rural Policy Zone 1.

In Support:

- Commercial units likely to increase HGV traffic along both the Kells and Starinagh roads. This will impact upon traffic management and safety.
- There is a lack of services and infrastructure to facilitate the development e.g. there are no footpaths or cycle lanes to and from the village.
- The scale of the E1 (General Employment) is not proportionate to the size of the settlement. This is contrary to Policy Objective CS 14.
- Collon has great potential to enhance employment in the tourism sector, this sustainable model of employment generation will be hindered by disproportionate commercial zoning
- The E1 Zoning of Area's A and B will contradict the policy objectives COL4, COL5, COL7, COL19 and Strategic Objective S07.

Chief Executive's Response:

The lands at Collon have been designated for Employment purposes for a number of Plan periods, the rationale was based on, 'Locating industry in Louth (2002)'. This document aimed to provide a more even distribution of employment opportunities throughout the County, particularly to the west where it was considered that less opportunities were available. Collon was identified as the most suitable settlement due to its strategic location between Dundalk and Drogheda and its proximity to the M1. Three parcels of lands were subsequently identified and zoned accordingly.

The site to the west of Collon is located along the Kells road, and partly adjoins Collon Business Park. It is considered appropriate that these lands remain zoned for (E1) General Employment as it would enable clustering of enterprise activities which would have economic and employment benefits for Collon and its hinterland.

The site to the south of Collon is located on rising land along a narrow Class 2 Road. Its development for employment purposes is likely to result in a traffic hazard. Furthermore, the site is located on rising land which would require significant site development works. Additionally, the elevated nature of the site would detract from Collon's rural setting and would adversely impact on views from the Architectural Conservation Area. With regard to the aforementioned it is considered appropriate that the site is rezoned to Rural Policy Zone 1.

Having regard to the quantum of land zoned for employment purposes throughout the County it is not considered that the zoning of the sites to the west and south west of Collon for (E1) General Employment would be contrary to either National nor Regional planning policy.

Chief Executive's Recommendation:

Rezone General Employment lands to the south of Collon to Rural Policy Zone 1 (Site A on submitters map).

Submission No:

LCDP DR486

Submitted By

Gerard and Nicola Devine

Theme (s):

Rezone Collon

Map showing lands subject to Submission:



Summary of Submission:

Specific request to de-zone Site A the submission also implies that Site B should be de-zoned.

In support it is stated:

- Map 4.3 of the Draft Louth CDP 2021-2027 marks Areas A, B and C for general employment use but it does not include Area D (Collon Business Park) which serves Collon well for employment uses.
- Area A has been vacant for 18 years , its zoning is contrary to Policy Objective CS14
- Areas A, B and C are surplus to Collon's business development requirements and contrary to Policy Objectives COL4, COL5 and COL6.
- Area D would meet with the requirements of COL6.
- In the Collon Village Health Check 2018, Areas A and B were not identified as priorities for development. Furthermore, the Kells and Starinagh Roads are not suitable to service these areas, they are both narrow. Furthermore the Kells Road is used by HGV's and an additional entrance would be dangerous.
- Retaining Area A's current zoning would not help reduce the dominance of the N2 (Section 8.2), promote the economic and social wellbeing of the village (Section 8.6), nor retain the village form (Sections 8.7 and 8.10.5). Site A is located within the Mattock River Valley within an Area of High Scenic Quality. Site A is also contrary to RPO 3.5 of the RSES.
- The de -zoning of Site A would be in compliance with SO 7

Chief Executive's Response:

The lands at Collon have been designated for Employment purposes for a number of Plan periods; the rationale was based on, 'Locating industry in Louth (2002)'. This document aimed to provide a more even distribution of employment opportunities throughout the County, particularly to the west where it was considered that fewer opportunities were available. Collon was identified as the most suitable settlement due to its strategic location between Dundalk and Drogheda and its proximity to the M1. Three parcels of lands were subsequently identified and zoned accordingly.

The site to the west of Collon is located along the Kells road, and partly adjoins Collon Business Park. It is considered appropriate that these lands remain zoned for (E1) General Employment as it would enable clustering of enterprise activities which would have economic and employment benefits for Collon and its hinterland.

The site to the south of Collon is located on rising land along a narrow Class 2 Road. Its development for employment purposes is likely to result in a traffic hazard. Furthermore, the site is located on rising land which would require significant site development works. Additionally, the elevated nature of the site would detract from Collon's rural setting and would adversely impact on views from the Architectural Conservation Area. With regard to the aforementioned, it is considered appropriate that the site is rezoned to Rural Policy Zone 1.

Having regard to the quantum of land zoned for employment purposes throughout the County it is not considered that the zoning of the sites to the west and south west of Collon for (E1) General Employment would be contrary to either National nor Regional planning policy.

Chief Executive's Recommendation:

Rezone General Employment lands to the south of Collon to Rural Policy Zone 1 (Site B on submitters map).

Submission No.	LCDP DR020
Submitted by:	Jong Kim on behalf of Property People Investment Ltd
Theme (s):	Rezone Dromiskin
Map showing lands subject to the Submission:	



Summary of Submission:

Request re-zoning of lands (1.6ha) west of Commons Road Dromiskin from Strategic Reserve to Residential.

In support:

- Lands are a logical/ natural extension of settlement, within walking distance to shops, are located along Dublin to Belfast corridor with good transport links.
- Public water main supply is available at Commons Grove Estate,
- Dromiskin Wastewater Treatment Plant has capacity,
- Site is not located in a flood restrictive area,
- Any new development will have regard to existing field patterns and trees/ hedgerow including those at south of site listed as 'Trees/hedgerows of special amenity value',
- There are no archaeological or heritage items located on site.
- There is a demand for family housing in Dromiskin.
- A proposed layout has been provided comprises semi-detached/detached dwellings with in curtilage parking and large front/ rear gardens.
- Planning history provided: 3 no residential planning applications on site: 02/254 (refused), 03/1342 (refused) and 08/1060(deemed withdrawn).
- Planning Authority is requested to consider population projections.

Chief Executive's Response:

Dromiskin is a village categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 846 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Dromiskin in creating a vibrant and sustainable rural community. The growth strategy for Dromiskin during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

In this regard it is considered that there are sufficient undeveloped lands within the settlement boundary of Dromiskin to meet the projected housing requirements as set out in the Core Strategy. In addition there are opportunities to provide housing on infill and brownfield lands in the central areas of the village. This is considered sufficient to meet the residential demands for the town during the life of the Plan.

The identification of any additional lands for residential development would result in the quantum of residential lands available being in excess of that required to meet the projected population increase and is contrary to the policy objective NPO 9 which limits population growth to below 30% of existing population. This could potentially result in a disproportionate increase in the population which could result in an unsustainable pattern of development that could place a strain on existing local services whilst also altering the character of the village. Such a residential and population increase and pattern of development would be contrary to national and regional policy and could undermine the growth strategy for the County as set out in the Draft Plan.

The subject lands are outside the settlement boundary of Dromiskin to the west 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.

The proposed layout is noted notwithstanding this, as per above there is no requirement for additional residential lands.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR457
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Submitted By	Joseph Doherty on behalf of Thomas Cummiskey
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Theme (s):	Rezone Dromiskin
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Map showing lands subject to Submission:	
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Summary of Submission:	
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Rezone lands at Dromiskin (2.9ha) and include within settlement boundary

In Support:

- There is a shortage of houses in Dundalk and rural area of County Louth, this is increasing the demand for housing in the countryside.
- Dromiskin is a Level 3 settlement with a wide variety of facilities.
- There is very little land available for development within the settlement and development of the site would provide an alternative to one-off housing and would curb sprawl to the south of Dundalk.
- There is a willingness to develop this site.
- Site adjoins residential development and would be a natural extension.

Chief Executive's Response:	
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There is no requirement for additional residential land in Dromiskin, please refer to DR020.

The subject lands are outside the settlement boundary of Dromiskin to the west 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.

Chief Executive's Recommendation:	
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No Change

Submission No:	LCDP DR587
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Submitted By	EHP on behalf of Pat Fallon
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Theme (s):	Rezone Dromiskin
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Map showing lands subject to Submission:



Summary of Submission:

- Include land (2.9acres) off Chapel Road within the settlement boundary and rezone from Rural Policy Zone 2 to Residential New (A2), and
- Rezone Sites 1-3 (see map above) from Residential New (A2) to Strategic Reserve (L1).

In Support:

- Lands are zoned as Rural Policy Zone 2, speculative development would be contrary to this zoning and development should be directed towards settlements.
- In the draft Plan, Dromiskin is a Level 4 Settlement. An objective of the draft Plan is to consolidate growth and direct it towards infill/ brownfield sites.
- Planning history for the 3 sites (as per map above) is provided.
- Sites 1 and 3 have been zoned and included within the village boundary but have no planning history. Site 2's permission lapsed in January 2016. A substantial portion of Site 1 is within Flood Zone B. The flooding guidelines advocate the development of other land in preference to lands prone to flooding.
- The quantum of undeveloped land is c 7.62acres which would more than adequately balance the submission lands.
- Revised settlement boundary and zoning would be in compliance with CS14, CS15, CS16 and SS55 of the draft Louth CDP 2021-2027.
- The subject site is more centrally located than Sites 1 to 3 and would fully integrate with existing residentially zoned lands.
- Development of the site would rejuvenate village core and reduce reliance on private car.
- Proposed amendments would not increase the overall quantum of housing land nor effect the Housing Strategy

Chief Executive's Response:

There is no requirement for additional residential land in Dromiskin, please refer to Point 1 of DR020.

It is considered that lands zoned Residential New (A2) in Dromiskin are appropriately zoned. The lands indicated in Dromiskin are vulnerable to pluvial flooding as identified in the OPW PFRAMS Study. Development within the village should consider the management and disposal of surface water in compliance with SuDS principles and in line with approved policy objectives of the Development Plan.

The subject lands are outside the settlement boundary of Dromiskin to the west of the village. 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.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR337

Submitted By

Dowdall Architects on behalf of Halpenny Family.

Theme (s):

Rezoning Knockbridge

Map showing lands subject to Submission:



Map 1



Map 2

Summary of Submission:

The lands outlined in blue are divided into Open Space, Village Centre and Residential New with a small portion at risk of flooding. It is proposed to amend the configuration of the zonings (refer to 2nd Map).

It is considered that this is the best way to develop the lands and provide the best New Residential and Green / Amenity Space to benefit the village of Knockbridge and provide for a sustainable development in the future.

Chief Executive's Response:

The Open Space zoning (H1) on the site has regard to the location of the Scheduled Site and Monument located to the south east of the submission lands.

Furthermore the provision of open space zoning to the site frontage reduces the opportunity to provide a consolidated village edge which would result in a fragmented streetscape. The dispersed and fragmented location of the proposed open space zoning would also prejudice the opportunity to provide a coherent and cohesive design response on the overall lands to ensure optimal passive surveillance and integration of open space into any proposed scheme.

No change to the zoning of the site is recommended.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR211

Submitted By

Brook McClure on behalf of Dungar Limited

Theme (s):

Rezone Louth Village, Core Strategy

Map showing lands subject to Submission:



Figure 1 Subject Site

Summary of Submission:

The submission states that in the Louth CDP 2015-2021 the site was within Zone 5 and within the draft Louth CDP 2015-2021 the site is included within Rural Policy Zone 2, however it should be noted that in both the current and draft Plans part of the site is zoned as residential new and the other part as outside settlement boundary within the rural area. It is requested that the entire site is included within the Settlement boundary and zoned Residential.

In Support:

- Inclusion of the site within the settlement boundary would be in compliance with HOU 15 of the draft Louth CDP 2015-2021;
- Discussions with the planning authority have taken place and the site is appropriate site for residential Development, scheme as presented did not address the village and should be accompanied by an Urban Design Statement and a new layout should provide a master planned approach;
- The subject site is in single ownership and can deliver housing to meet the needs of Louth Village in an expedient manner;
- Failure to rezone would be a missed opportunity for compact urban growth in an area that is under a strong urban influence and contrary to National Policy;
- Site has the capacity to accommodate a sustainable increase in residential density.

Chief Executive's Response:

Louth Village is categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 735 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Louth Village in creating a vibrant and sustainable rural community. The growth strategy for Louth Village during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

Development is nearly complete on the lands to the south of the submission site (zoned A2 New Residential in the Draft Plan) thus it is considered appropriate that this mapping anomaly is rectified and that these lands are re-zoned to A1 Existing Residential.

In lieu of the aforementioned lands it is considered appropriate to include the submission lands in their entirety with the settlement boundary and zone as A2 New Residential.

The lands are located in close proximity to the Village Centre and would help consolidate the existing village form at this location and as such is considered to accord with national and regional planning policy.

Chief Executive's Recommendation:

1. Rezone lands to the south west of the site from A1 New Residential to A2 Existing Residential.
2. Rezone submission lands in its entirety to A1 New Residential.

Submission No.

LCDP DR013

Submitted by:

Pat Devine

Theme (s):

Rezone Louth Village

Map showing lands subject to Submission:



Summary of Submission:

The subject lands are within Development Zone 2 as per the draft Plan and it is requested that they are included within the settlement boundary of Louth Village and rezoned to Residential, 3 no. options have been provided.

The submissions pertains to family land at the rear of Mr Devine's home, which he now wishes to gift to his nephew who's qualifying address is within the settlement boundary of Louth Village.

Louth Village is designated as a Level 4 Settlement in the Louth CDP 2021-2027, as per Section 2.3.2 of the draft Plan future growth will focus on localised sustainable growth meeting the needs of local population. Table 2.14 of the draft Louth CDP 2021-2027 that there is a projected housing requirement of 414 units over the Plan period. It is contended that their inclusion within the settlement boundary would offer an infill opportunity and as such the re-zoning would be in compliance with Section 2.66 of the NPF which pertains to compact growth and LOU 3 of the draft Louth CDP 2021-2027 which relates to brownfield/ infill development.

3no. options have been provided (see maps above):

- **Map 1** (Option A): Rectangular shaped piece of land to be included within settlement boundary and zoned as Residential Existing, or
- **Map 2** (Option B): Square shaped piece of land is included within settlement boundary and zoned as Residential Existing, or
- **Map 3** (Option C): Larger parcel of land is included within settlement boundary and zoned as Residential Existing.

Any increase in the amount of land zoned Existing Residential would be offset by the following re- zoning :

- **Map 4:** Residential Existing lands pertaining to a driveway only should be omitted from settlement boundary and rezoned.
- **Map 5:** Rezone two areas from Residential Existing to Village Centre.

Chief Executive's Response:

Louth Village is categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 735 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Louth Village in creating a vibrant and sustainable rural community. The growth strategy for Louth Village during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

A review of the lands identified for 'New Residential' uses in Louth Village was carried out with a requirement to identify a small area of residential lands identified.

Whilst it is acknowledged the lands are adjacent to community facilities they are further removed from the village centre than those which are recommended for inclusion under submission no.211 and in addition there are infrastructural constraints in this part of the village.

Taking this into account it is not recommended to include the subject lands within the development boundary and amend the land use zonings as proposed.

Chief Executive's Recommendation

No Change

Submission No:

LCDP DR412

Submitted By

Mc Ardle Doyle on behalf of St. Mochtas GFC

Theme (s):

Rezone Louth Village

Map showing lands subject to Submission:



Figure 1: Draft Louth CDP 2021 - Louth Village Draft Zoning and Flood Zones Map 4.1P

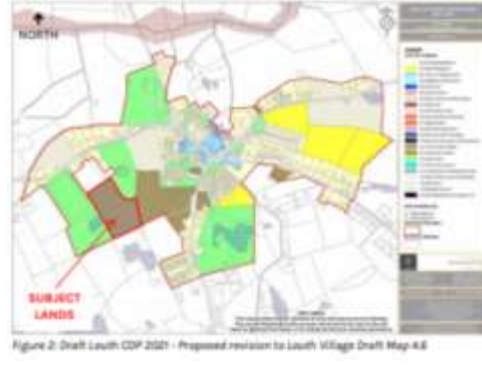


Figure 2: Draft Louth CDP 2021 - Proposed revision to Louth Village Draft Map 4.1P

Summary of Submission:

- Louth Village Settlement Boundary is revised to include the subject lands. Subject lands to be zoned 'Community Facilities G1.'
- History of the club outlined and list of recent additions provided including provision of walking track, gym, 350 seater stand and expansion of club house. It is stated that due to increased membership the club have begun plans to acquire an additional pitch.
- The subject lands are situated between the school and the football grounds and would be an ideal fit for a future development; historically there are strong links between both.
- The rezoning will contribute to connectivity and will align with the following Policy Objectives LOU11, LOU 12, LOU 13, RES39 and SC29.
- It is stated that the community facility zoning permits the development of park/playground, recreational/amenity space and that a recreational/sports facility and cycleway/walkway trails are open for consideration.
- The rezoning of the subject lands to Community Facilities (G1) will ensure that St, Mochtas GFC grounds can provide the additional needed facilities and desired linkages from their grounds to the heart of Louth Village. The whole community can benefit from the club's future

Chief Executive's Response:

The provision of sporting and recreation facilities particularly within settlements is promoted and supported throughout the draft Louth CDP 2021-2027.

The submission requests the rezoning of the land to Community Facilities (G1) but the 'permitted uses' identified within the submission pertain to Open Space (H1).

The subject lands are identified as Rural Policy Zone 2 in the draft Louth CDP 2021-2027, provision of playing fields/ community facilities are not precluded within Rural Policy Zone 2, each application will be assessed on its own merits on a case by case basis in accordance with the provisions of Chapter 13 of the draft Plan.

Chief Executive's Recommendation:

No Change

Submission No.	LCDP DR003
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Submitted by:	Genesis Planning Consultants on behalf of representatives of the estate of Patrick McCluskey
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Theme (s):	Rezone Omeath, Core Strategy Additional Policy regarding brownfield sites
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Map showing lands subject to Submission:	
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Summary of Submission:	
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The submission relates to a 3.7ha site at Omeath which is partially within the settlement boundary and currently zoned for Tourism and Leisure. It requests that the site, in its entirety, is included within the settlement boundary of Omeath and zoned for residential purposes.

The submission also provides details regarding revised housing land requirements and requests that there are additional policies in Plan which prioritise brownfield sites.

The submission includes a detailed overview of national, regional and local policy. Objectives 3a, 3b, 5, 6, 7, 11, 15, 16, 72a and 72b as well as Section 4.5 and Appendix 3 of the NPF are specifically mentioned. Various sections of the RSES and RPO's 3.3, 4.78, 4.83 are cited. Details regarding policies contained within the LCDP 2015-2021 and the draft Plan are also provided.

It is stated that 7.2ha of residential zoned land (accommodating 108 residential units) is required in Omeath. These figures are based on an analysis of population growth of the settlement and the Drummullagh ED, household size, vacancy rates, completion rates, affordability, housing demand and provision of a housing mix. It is also highlighted that some of the residential land zoned in the draft Plan is not suitable for development.

The key characteristics of the land subject to the submission is outlined:

- It is directly accessible from existing road network;
- Within walking distance from local amenities;
- Serviceable;
- Included within and contiguous with settlement boundary of Omeath; and
- Sequentially the next available parcel of land, representing a brownfield and infill opportunity.

It is stated that the site is strategically important to the overall development of Omeath, its rezoning would also strengthen the economy and reduce seasonal dependence on tourism.

Chief Executive's Response:

Land Use Zoning

Omeath is a coastal village categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 603 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Omeath in creating a vibrant and sustainable rural community. The growth strategy for Omeath during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

National and Regional policy requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. In this regard it is considered that there are sufficient undeveloped lands within the development boundary of Omeath to meet the projected housing requirements as set out in the Core Strategy.

There is no requirement to identify any additional lands for development in Omeath. The zoning of the subject lands would result in the quantum of residential lands available being in excess of that required to meet the housing demand for Omeath as set out in the Core Strategy.

There are opportunities to provide housing on infill and brownfield lands in the central areas of the village. This is considered sufficient to meet the residential demands for the town during the life of the Plan.

The lands that are the subject of this submission are presently in use as a caravan park. Part of the lands are zoned 'Tourism and Leisure' with a section of the lands outside the settlement boundary of Omeath. These lands are located on the edge of Omeath and are removed from the village core. The zoning of these lands for residential development would not follow the sequential approach to development as advocated in national and regional policy and would result in the linear expansion of the settlement. This would be contrary to national and regional policy which promotes compact growth and consolidation of development within existing settlements.

The 'Sustainable Residential Development, Guidelines for Planning Authorities 2005' define 'brownfield' lands as "any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces", generally comprise redundant industrial lands or docks but may also include former barracks, hospitals or even occasionally, obsolete housing areas. Whilst it is acknowledged that the subject lands are currently in use as a caravan park they are not considered "brownfield" having regard to the definition in the aforementioned Guidelines. The development of these lands for residential development would not achieve the creation of a compact settlement given their location on the edge of the settlement and the availability of other more appropriate located lands for such development.

Additional Policy Objectives Supporting Brownfield Development

The Draft Plan has a strong narrative and policy framework with regard to infill and brownfield development set out in chapters 2 and 3. This includes policy objectives CS 2 and CS 14. It is not considered that any additional policy objectives are required with regard to brownfield development.

Taking the foregoing into account it is considered that the subject lands are inappropriate for residential development and there is no requirement for additional lands to be zoned for 'New Residential' development in Omeath during the life of this Plan.

Chief Executive's Recommendation

No Change

Submission No.

LCDP DR005

Submitted by:

Genesis Planning Consultants on behalf of St. Augustine Property Ltd.

Theme (s):

Rezone Omeath, Core Strategy

Map showing lands subject to Submission



Summary of Submission:

The submission relates to a 0.73ha site at Knocknagoran, Omeath. It requests that the site is included within the settlement boundary of Omeath and zoned as New Residential A2.

The submission also provides details regarding revised housing land requirements.

The submission includes a detailed overview of national, regional and local policy. Objectives 3a, 5, 7, 72a and 72b as well as Section 4.5 and Appendix 3 of the NPF are specifically mentioned. Various sections of the RSES and RPO's 4.78, 4.83 are cited. Details regarding policies contained within the LCDP 2015-2021 and the draft Louth CDP 2021-2027 are also provided.

It is stated that 7.2ha of residential zoned land (accommodating 108units) is required in Omeath.

These figures based on an analysis of population growth of the settlement and the Drummullagh ED, household size, vacancy rates, construction rates, affordability , housing demand and provision of a housing mix. It is also highlighted that some of the residential land zoned in the draft Louth CDP 2021-2027 is not suitable for development.

The submission outlines the key characteristics of the site, it is:

- Serviced and serviceable;
- Directly accessible from the existing road infrastructure;
- Within walking distance of local amenities;
- Within walking distance of the bus route which passes through Omeath;
- Sequentially the next available parcel of land available for development and provides a brownfield/ infill opportunity.

It is stated that the site is strategically important to the overall development of Omeath, delivery of housing should be sequentially and this site is more suitable than other lands in Omeath.

Chief Executive's Response:

Omeath is a coastal village categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 603 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Omeath in creating a vibrant and sustainable rural community. The growth strategy for Omeath during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

National and Regional policy requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. In this regard it is considered that there are sufficient undeveloped lands within the development boundary of Omeath to meet the projected housing requirements as set out in the Core Strategy.

There is no requirement to identify any additional lands for development in Omeath. The zoning of the subject lands would result in the quantum of residential lands available being in excess of that required to meet the housing demand for Omeath as set out in the Core Strategy.

There are opportunities to provide housing on infill and brownfield lands in the central areas of the village. This is considered sufficient to meet the residential demands for the town during the life of the Plan.

The identification of any additional lands for residential development would result in the quantum of residential lands available being in excess of that required to meet the projected population increase and is contrary to the policy objective NPO 9 which limits population growth to below 30% of existing population. This could potentially result in a disproportionate increase in the population which could result in an unsustainable pattern of development that could place a strain on existing local services whilst also altering the character of the village.

Such a residential and population increase and pattern of development would be contrary to national and regional policy and could undermine the growth strategy for the County as set out in the Draft Plan.

The subject lands are outside the settlement boundary of Omeath to the west of the settlement. The submission lands are located in a visually sensitive, Area of High Scenic Quality. Any future extension to the settlement boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation

No Change

Submission No.

LCDP DR070

Submitted by:

Patrick Rooney

Theme (s):

Rezone Omeath

Map showing location of Map subject to Submission



Summary of Submission:

Requested that Lands at Omeath should be re-zoned from Strategic Reserve (L1) to New Residential (A2).

In Support:

- Site is located beside the proposed Waste water treatment plant which is due to be completed during the lifetime of the Plan, it would be logical that this small strip zoned Strategic Reserve is converted to New Residential for completeness and uniformity.

Chief Executive's Response:

Omeath is a coastal village categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 603 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Omeath in creating a vibrant and sustainable rural community.

The growth strategy for Omeath during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

National and Regional policy requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. In this regard it is considered that there are sufficient undeveloped lands within the development boundary of Omeath to meet the projected housing requirements as set out in the Core Strategy.

There is no requirement to identify any additional lands for development in Omeath. The zoning of the subject lands would result in the quantum of residential lands available being in excess of that required to meet the housing demand for Omeath as set out in the Core Strategy.

There are opportunities to provide housing on infill and brownfield lands in the central areas of the village. This is considered sufficient to meet the residential demands for the town during the life of the Plan.

The identification of any additional lands for residential development would result in the quantum of residential lands available being in excess of that required to meet the projected population increase and is contrary to the policy objective NPO 9 which limits population growth to below 30% of existing population. This could potentially result in a disproportionate increase in the population which could result in an unsustainable pattern of development that could place a strain on existing local services whilst also altering the character of the village. Such a residential and population increase and pattern of development would be contrary to national and regional policy and could undermine the growth strategy for the County as set out in the Draft Plan.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR341
Submitted By	EHP Services on behalf of Donal Boyle
Theme (s):	Rezone Omeath
Map showing lands subject to Submission:	



Summary of Submission:

Request that the subject site (1.61ha) is included within the Settlement boundary and rezoned to New Residential (A2).

In Support:

Background

Planning history of the adjoining lands provided. It is stated that the residential estate in which the subject site is located has been developed incrementally over the years.

Planning Policy Context

A detailed analysis of the NPF has been carried out, Section 4.5, NPO's 3a, 3c and 33 are specifically mentioned in relation to provision of housing within existing footprints and on brownfield/ infill sites. An examination of the RSES's has also been undertaken, RSO2, 4.78 and 4.83 are cited in relation to compact growth and the development of small towns and villages. The Guidelines to Planning Authorities on Sustainable Residential Development in Urban Areas (2009) are also mentioned. In terms of the Louth Housing Strategy 2021-2027 it is stated that the settlement of Omeath increased by 100 no. persons between 2011 and 2016. In the Louth CDP 2015-2021, Omeath is a Level 3 rural settlement and Policy SS9 sets out the need to support new development

Justification for Revision and Rezoning

In the draft Louth CDP 2021-2027 Omeath is identified as a Level 4 Settlement, the future population growth for all Level 4's is 3.7% or 436 units. Having regard to Omeath's population growth during the period 2011-2016 and average household size, an additional 42.39 units (accommodating 117 persons) would be required.

Subject site is physically and contextually in an ideal position to accommodate additional population growth. This would enable the final phase of Cul na Rath estate to be developed. The site complies with Section 5.7 of the Sustainable Housing Guidelines. The site comprises of a partly completed access and footpath running past No.16 Cul na Rath and underground infrastructural services. The site was also subject to engineering works.

Chief Executive's Response:

Omeath is a coastal village categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 603 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Omeath in creating a vibrant and sustainable rural community. The growth strategy for Omeath during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

National and Regional policy requires an evidence based approach to be taken to land use zoning and the alignment of residential zoning with the projected demand for housing. In this regard it is considered that there are sufficient undeveloped lands within the development boundary of Omeath to meet the projected housing requirements as set out in the Core Strategy.

There is no requirement to identify any additional lands for development in Omeath. The zoning of the subject lands would result in the quantum of residential lands available being in excess of that required to meet the housing demand for Omeath as set out in the Core Strategy.

There are opportunities to provide housing on infill and brownfield lands in the central areas of the village. This is considered sufficient to meet the residential demands for the town during the life of the Plan.

The identification of any additional lands for residential development would result in the quantum of residential lands available being in excess of that required to meet the projected population increase and is contrary to the policy objective NPO 9 which limits population growth to below 30% of existing population. This could potentially result in a disproportionate increase in the population which could result in an unsustainable pattern of development that could place a strain on existing local services whilst also altering the character of the village. Such a residential and population increase and pattern of development would be contrary to national and regional policy and could undermine the growth strategy for the County as set out in the Draft Plan.

The subject lands are outside the settlement boundary of Omeath to the west 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. Furthermore the submission lands are located in a visually sensitive, Area of High Scenic Quality. Any future extension to the settlement boundary must consider the potential impact on this sensitive landscape.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR128
Submitted By	Stephen Ward on behalf of Rainberry Ltd
Theme (s):	Rezone Tallanstown, Core Strategy
Map showing lands subject to Submission:	



Summary of Submission:

Submission relates to a parcel of land within the settlement boundary of Tallanstown, the submission relates to two inter linked zoning changes:

1. 0.65ha of land are rezoned from Strategic Reserve (L1) to Open space (H1) thereby allowing the development of an amenity walkway and playground.
2. 2.9ha are rezoned from Strategic Reserve (L1) to New Residential (A2).

In support of No. 1 it is stated that:

- The construction of an amenity walkway and playground (outside the flood area), will benefit the village as well as the residents and its development, would be in compliance with TAL 10, TAL14 and TAL19.

In support of No.2, the submission states:

- Works commenced on the site (under planning reference 05/933) and as such it ought to be considered as a brownfield site, furthermore its development would be in compliance with 'Resolving Irelands Unfinished Housing Developments' (2011). In the Tiered Assessment Analysis (Appendix 2 of the draft Louth CDP 2021-2027) the lands received a high score in terms of their suitability for development, however the site deserves a better (lower) score for brownfill/ infill. Development of the site would complement policy objectives in the draft Louth CDP 2021-2027 pertaining to brownfield development, including CS14 and TAL 3. Whilst TAL 2 states that 'housing allocation for Tallanstown is not exceeded' housing allocations for individual settlements has not been provided. It is strongly suggested that residential development on infill and brownfield sites are considered as 'windfall sites' and their development should not be counted towards meeting housing allocations.
- It is suggested that in the absence of national guidance on preparation of development plans, a flexible approach is taken to the provision of population targets and that as per the Director's report on the 'Regional Spatial Strategy', population growth rates should be seen as minimum targets.

The 'Regional Demographic and Structural Housing Demand at County Level (ERSI Dec2021), suggests that housing allocations are 30% lower than required and that obsolescence rate needs to be factored in. The amount of land zoned A2 in Tallanstown is too restrictive.

- Provision of additional housing land in Tallanstown would complement CS15 and CS16 of the draft Louth CDP 2021-2027, allowing sustainable population growth over the plan period.
- There is sufficient capacity at the Cavan Hill and North Louth Water Resource Zone.

Chief Executive's Response:

1. It is not considered appropriate to zone additional lands adjacent to the river as Open Space. The draft Composite Map indicates a riparian buffer zone, the exact extent of land required to provide a walkway/ playground will be determined in the event that a planning application is submitted in the future.
2. Tallanstown is a village categorised as a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 673 (CSO 2016). The Draft Plan recognises the importance of rural villages such as Tallanstown in creating a vibrant and sustainable rural community.

The growth strategy for Tallanstown during the life of this Plan will focus on sustainable growth that will meet the needs of the local population. The primary focus of population and residential growth in the County will be in the Regional Growth Centres of Drogheda and Dundalk.

In this regard it is considered that there are sufficient undeveloped lands within the settlement boundary of Tallanstown to meet the projected housing requirements as set out in the Core Strategy.

In addition there are opportunities to provide housing on infill and brownfield lands in the central areas of the village. This is considered sufficient to meet the residential demands for the town during the life of the Plan.

The identification of any additional lands for residential development would result in the quantum of residential lands available being in excess of that required to meet the projected population increase and is contrary to the policy objective NPO 9 which limits population growth to below 30% of existing population. This could potentially result in a disproportionate increase in the population which could result in an unsustainable pattern of development that could place a strain on existing local services whilst also altering the character of the village. Such a residential and population increase and pattern of development would be contrary to national and regional policy and could undermine the growth strategy for the County as set out in the Draft Plan.

The submission indicates that infill and brownfield lands should not be included in the housing allocation and treated as ‘windfall’ sites. National policy requires 30% of housing to be delivered on infill and brownfield sites in order to achieve compact growth. Calculating the quantum of land that can be provided on such lands is therefore a critical element of the identification of total residential lands required in a settlement and the overall County.

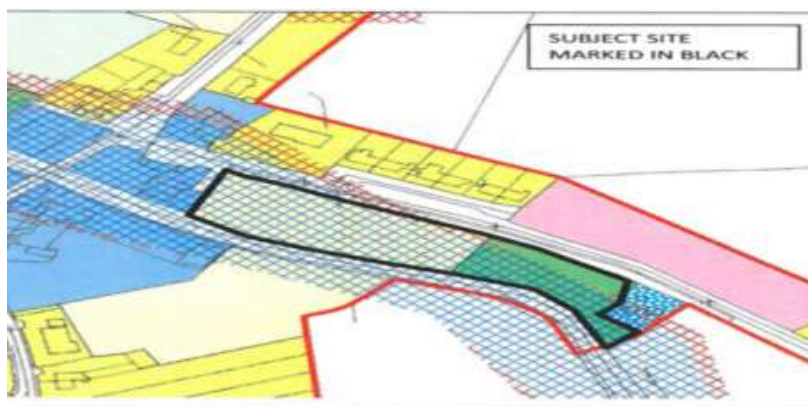
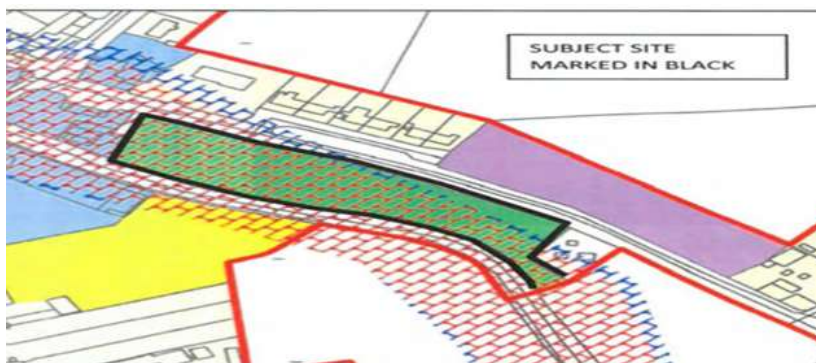
It is considered that the Tiered Assessment Analysis (Appendix 2 of the draft Louth CDP 2021-2027) was carried out correctly, notwithstanding this there is no requirement for additional residential land within the settlement of Tallanstown.

No evidence has been submitted to verify that the submission lands pertain to a brownfield site, notwithstanding this there is a legacy of over zoning in Tallanstown and additional residential lands in the settlement are not required.

Chief Executive’s Recommendation:

No Change

Submission No:	LCDP DR394
Submitted By	P. Herr & Associates on behalf of Anthony Loughran.
Theme (s):	Rezone Tallanstown
Map showing lands subject to Submission:	



Summary of Submission:

Rezone part of the subject lands from Open Space (H1) to Residential.

In Support:

- The western portion of the site is zoned as New Residential' in the current Louth County Development Plan 2015-2021, the rezoning has resulted in the loss of 0.591ha (20%) of residential lands, no additional residential lands have been zoned in the draft Louth CDP 2021-2027.
- The focus of Level 4 Settlements is to direct residential growth towards urban centres while protecting the rural hinterlands.
- Water and Wastewater Infrastructure has sufficient capacity to cater for further growth within the village.
- Development within Tallanstown has been stagnant, in contrast an application for 14no units was submitted on the site (Planning Ref: 19625), further information was requested regarding layout, the application was subsequently withdrawn. It is intended to submit a new planning application in early 2021.
- If the residential zoning on the site is retained, 0.304ha of the site will be ceded to Louth County Council to be utilised as a playground, which is in accordance within TAL 10 of the draft Plan.
- The majority of the subject lands are in Flood Zone A/B. TAL 12 refers to highly vulnerable uses as per the Flood Guidelines. These lands are the only in the county whose current residential zoning has been changed to Open Space under this policy. The 'residential zoning' has been retained in a number of areas within Tallanstown which are prone to flooding
- The PFRA maps are based on a relatively basic LiDAR Topographical survey and are not to be fully accurate at a local level. A Site Specific Flood Risk Assessment was carried out in support of planning Ref: 19/625. This highlighted deficiencies with the PFRA Map. Furthermore, more recent modelling of the River Glyde carried out by the OPW also indicates that the extent of flooding at the site shall be significantly less than that shown on the PFRA Map (Source: public maps available on www.floodmaps.ie).

Chief Executive's Response:

Tallanstown is a Level 4 Settlement 'Small Town or Village' in the settlement hierarchy of the Draft Plan with a population of 673 persons. (CSO 2016). The Draft Plan recognises the importance of rural villages such as Tallanstown in creating a vibrant and sustainable rural community. The growth strategy for Tallanstown during the life of this Plan will focus on sustainable growth that will meet the needs of the local population.

The subject lands are located to north of the River Glyde and east of the village centre. As illustrated on the Composite Map, the site is primarily located on lands identified as Flood Zone A and marginally by Flood Zone B as detailed in the PFRA.

A review of the Strategic Flood Risk Assessment was conducted on foot of the submissions received from both the Office of the Planning Regulator (Ref No. 817) and the Office of Public Works (Ref. No. 629). On foot of this, there is no objection to the rezoning of the subject lands from 'Open Space' to 'New Residential'. A detailed site specific FRA shall be submitted with any planning application to address flood risk, propose mitigation measures and assign appropriate development.

In conclusion, having regard to the constraints of the site and the limited number of residential units which could be provided, there is no objection to the rezoning of the lands to New Residential (A2), it is considered that this will facilitate consolidated growth of the settlement and be in accordance with the Core Strategy.

Chief Executive's Recommendation:

Rezone submission lands to New Residential (A2).

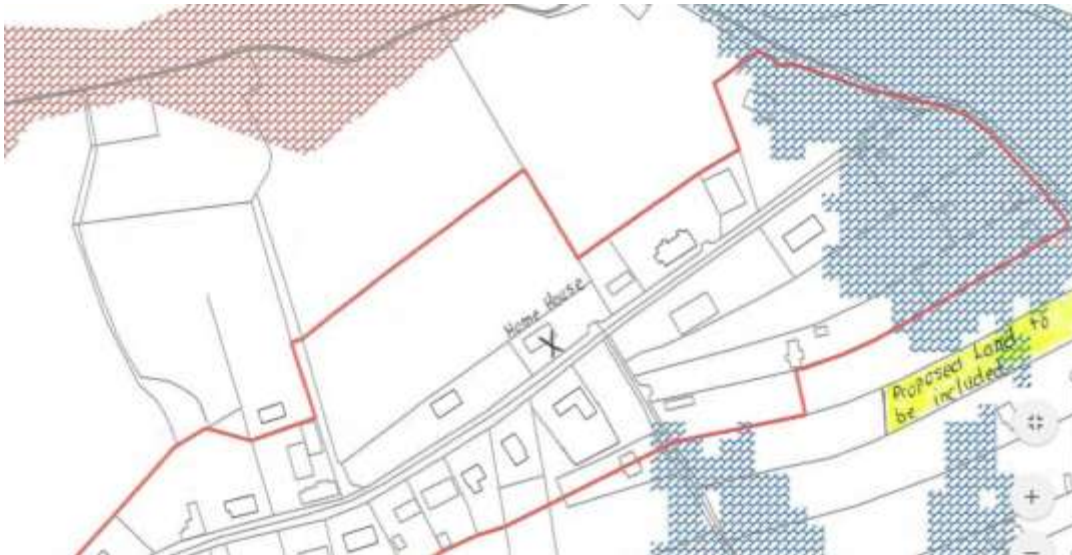


Section 2g: Chief Executive's Summary, Response and Recommendation on Zoning Submissions – Level 5's (Rural Nodes)

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No:	LCDP DR347
Submitted By	Tracy McCarragher
Theme (s):	Include within Settlement Boundary Ballagan or change rural policy

Map showing lands subject to Submission:



Summary of Submission:

Request that Ballagan Settlement boundary is extended to include lands marked yellow on map or amend policy.

Lands (0.2ha) are the only family lands. Submitter was born and raised in the area, there is no land available within the development centre. Any dwelling would be blend in with the other properties and surrounding environment. If the boundary can't be extended it is requested that the rules are amended so that she is able to build in the rural area of the Cooley Peninsula.

Chief Executive's Response:

- The site is located to the south east of Ballagan within Rural Policy Zone 2.
- The easterly part of the site is prone to flooding (Flood Zone B).
- Carlingford Shore Special Area of Conservation (SAC), Carlingford Lough Special Protection Area (SPA) and Carlingford Lough proposed Natural Heritage Area, are located immediately east of the site.
- Ballagan is characterised by a cluster of residential properties with no local services or facilities. Whilst mains water is available there are no waste water services available.
- As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities the Draft Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within Ballagan (to the north and south west) to cater for any demand for housing which may arise of the Plan period.

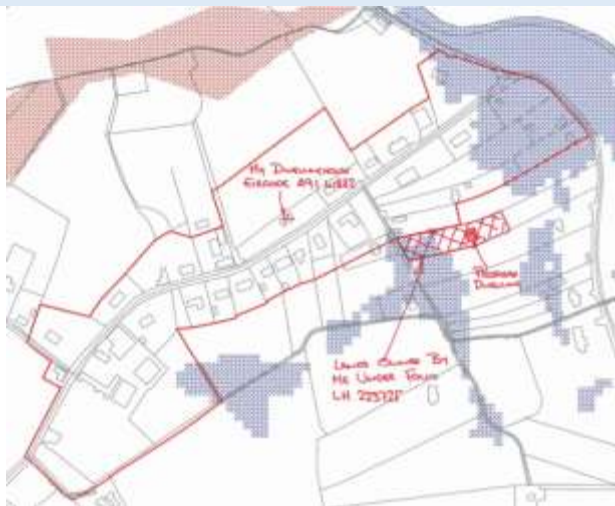
- In addition there are opportunities to provide housing on infill and brownfield lands.
- Furthermore, inclusion of additional lands would result in sprawl detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.
- Please refer to Rural Policy General Composite Response.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR448
Submitted By	Pearse McCarragher
Theme (s):	Settlement Boundary Ballagan or amend policy

Map showing lands subject to Submission:



Summary of Submission:

Request that settlement boundary at Ballagan be increased to include lands or criteria amended to allow children to build within 300m of settlement boundary.

In support:

- I with my family live in the development centre of Ballagan and have done for generations.
- I own lands adjacent to the development centre boundary and I wish to have the boundary moved to include the proposed site.
- Attached is map showing the location of my home, the proposed site and location of dwelling that I wish to have included in the development centre.
- If for some reason this site cannot be included in the development centre we would ask that the current criteria be changed to allow my children build on this site even though it the outside the boundary and within 300m of the boundary

Chief Executive's Response:

There is no requirement for additional land in Ballagan, please refer to Points 1 -6 of DR 0347.

With regard to Point 2 the westerly part of the site is prone to flooding.

Please refer to Rural Policy General Composite Response.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR449
Submitted By	Colm McCarragher
Theme (s):	Settlement Boundary Ballagan or amend policy

Map showing lands subject to Submission:**Summary of Submission:**

Request that settlement boundary of Ballagan be increased to include lands or criteria amended to allow children to build within 300m of settlement boundary.

In support:

- I with my family live in the development centre of Ballagan and have done so for generations.
- I own lands adjacent to the development centre boundary and I wish to have the boundary moved to include the proposed site.
- Attached is map showing the location of my home, the proposed site and location of dwelling that I wish to have included in the development centre.
- If for some reason this site cannot be included in the development centre we would ask that the current criteria be changed to allow my children build on this site even though it the outside the boundary and within 300m of the boundary

Chief Executive's Response:

There is no requirement for additional land in Ballagan, please refer to Points 1 -6 of DR 0347.

With regard to Point 2, the westerly part of the site is prone to flooding.

Please refer to Rural Policy General Composite Response.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR576

Submitted By

Martin McCumiskey

Theme (s):

Settlement Boundary Ballagan

Map showing lands subject to Submission:**Summary of Submission:**

Request to extend boundary to include lands indicated on map.

- To enable family to build and stay in the area they grew up.
- Lands are directly beside boundary line

Chief Executive's Response:

There is no requirement for additional land in Ballagan, please refer to Points 1 -6 of DR 0347.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR336
Submitted By	Eamon McKenna
Theme (s):	Settlement Boundary
Map showing lands subject to Submission:	



Summary of Submission:

Request that part of the landholding (9.037ha) as shown in map above is included within the settlement boundary of Ballapousta. It should be noted that the exact extent is not specified.

In support of the submission the following is stated:

- Carriageway at Drakestown lane can be widened and junction re-aligned.
- Virtually all land within boundary of Ballapousta has been built upon.
- Only one plot is undeveloped, it would be difficult to build upon given proximity to graveyard, farm and road junction, some of the land is also identified as being located within Flood Zone B.
- Community facilities within walking distance are listed.
- Policy 2.18 is cited (New Homes in Small Towns and Villages)
- Lands surrounding Ballapousta are either built up or difficult to develop due to undulating nature
- Development here would result in consolidation of village core and prevent further sprawl/ ribboning.
- Mains water is available and the lands are not prone to flooding.
- Part of these lands were previously zoned in the Louth CDP 2009-2015.

Chief Executive's Response:

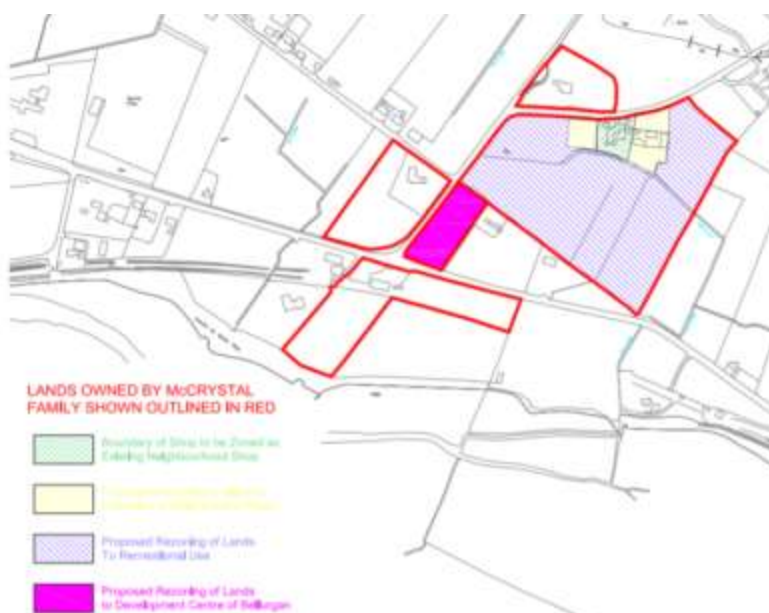
- The site is located on elevated grounds to the south west of Ballapousta within Rural Policy Zone 2. It is presently accessed via a narrow laneway.
- There are presently some local services and facilities present in Ballapousta including a National School, church and graveyard and whilst mains water is available there are no waste water services available.
- As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities, the Draft Plan has identified lands within the rural nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within the Ballapousta (to the north west) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands.
- Furthermore, inclusion of additional lands would result in sprawl detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR495
Submitted By	Bryan McCrystal
Theme (s):	Rezone

Map showing lands subject to Submission:



Summary of Submission:

Request to rezone the various areas outlined red on map

In support:

- The McCrystal family own approximately 12 hectares (30 acres).
- The existing shop and post office has been in its current location since 1912, it is the heart of the community and we wish to build on this in the future.
- We would love to provide small units to complement our shop, i.e. doctors' surgery, hairdresser, barber, coffee shop and other small scale units to have a hub of local enterprises in the area for the community.
- In addition to this we are currently developing a bicycle track around our lands and would love to build on this to provide a safe recreational space for the community with walkways, cycle tracks etc.

Chief Executive's Response:

The submission lands are located c. 160m west of the settlement boundary of Bellurgan, within Rural Policy Zone 1 and within an Area of High Scenic Quality (AHSQ). The sites straddle either side of the R173.

The lands are located c.160m west of the Bellurgan's settlement boundary, their re-zoning would essentially result in the provision of an additional rural node, which is not considered necessary nor in keeping with the remit of national, regional and local planning policy.

Furthermore, the rezoning of these lands would result in sprawl, this would be detrimental not only to the character of Bellurgan but also to the AHSQ and would be contrary to national and regional planning policy.

The draft Plan does not preclude the development of a bicycle track or any other recreational facility, it would be considered on a case by case basis in accordance with Chapter 13, Section 13.19.2.4, 'non-conforming uses'.

Chief Executive's Recommendation:

No Change

Submission No.	LCDP DR037
Submitted by:	Frank Burke & Assoc. on behalf of Francis Bishop.
Theme (s):	Rezone Darver
Map showing lands subject to Submission:	



Summary of Submission:

Subject lands at Darver (approximately 4ha) should be included within the development boundary of the settlement.

3. In support of the proposal the following points are made:
 - Owner has been approached by developer on many occasions thus there is a demand.
 - Development of individual sites would negatively impact on agricultural holding and result in ribboning.
 - Subject lands are centrally located.
 - Aware that the village has no services but this small block would alleviate demand for individual sites and minimize impact upon village,
 - Indicative layout provided which would comply with DMURS
 - In the event that a mains water and sewage system was developed for the village, it would be possible to connect to same.

Chief Executive's Response:

- The site is located to the east of Darver within Rural Policy Zone 2.
- It is acknowledged that there are some local services and facilities present in Darver including a National School, church and graveyard and whilst mains water is available there are no waste water services available.
- As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities, the Draft Plan has identified lands within the rural nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within the Darver (to the north) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands.
- Furthermore, inclusion of additional lands would result in sprawl detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR437
Submitted By	P Herr and Associates on behalf Kevin McGeough
Theme (s):	Settlement Boundary Faughart
Map showing lands subject to Submission:	



Summary of Submission:

Inclusion of lands within the Settlement Boundary of Faughart Site 1(3.44ha) and Site 2 (2.484ha)

In support:

- Lands are located next to the Level 4 Settlement.
- There is little development land left in Faughart.
- Lands should be included as the aim of the Plan is to direct housing developments within settlements.
- The National school depends on younger population coming through.
- Lands were previously zoned residential in the Louth CDP 2009-2015 and landowners were in the process of seeking planning permission, however the economic crash occurred.

Chief Executive's Response:

Site 1 - Located to the north east of the settlement on open rising land

Site 2 - Located to the south east of the settlement accessed from a narrow local road.

- Both sites are located within Rural Policy Zone 1 within an Area of High Scenic Quality (AHSQ).

- It is acknowledged that there are some local services and facilities present in Faughart including a National School, however this rural node does not benefit from either mains water nor waste water services.
- As part of the strategy of strengthening the fabric of rural and creating sustainable rural communities the Draft Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. Whilst there is no land available in Faughart, there are opportunities to provide housing on infill and brownfield lands and there is land available in other nearby rural nodes.
- Having regard to the sensitive landscape setting to the north of Faughart (AHSQ) it is considered that development of either Site 1 or Site 2 would contribute to sprawl, as such would be detrimental to the overall setting of this rural node and contrary to national and regional planning policy. Furthermore, the development of Site 2 could result in access/ road safety issues.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR389
Submitted By	Bernadette Mc Cann
Theme (s):	Settlement boundary Glenmore

Map showing lands subject to Submission:



Summary of Submission:

Request that the lands (0.66) marked with a Red Dot be included in the Glenmore Development Centre.

Lived in the area and owned site for a number of years. Request that site be included within development centre so that son who has a medical condition can build on it.

Chief Executive's Response:

The site is located to the north west of Glenmore in Rural Policy Zone 1 within an Area of High Scenic Quality (AHSQ). It is acknowledged that there are some local services and facilities present in Glenmore including a National School, however this rural node does not benefit from either mains water or waste water services.

As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities the Draft Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within Glenmore (to the south west) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands.

Furthermore, inclusion of additional 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.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR396

Submitted By

Tommy Mc Cann

Theme (s):

Settlement Boundary Glenmore

Map showing lands subject to Submission:

Summary of Submission:

Request that the lands (0.66) marked with a Red Dot be included in the Glenmore Development Centre.

Lived in the area and owned site for a number of years. Request that site be included within development centre so that son can build on it, thereby providing comfort as submitter and his wife get older.

Chief Executive's Response:

There is no requirement for additional land in Glenmore, please refer to DR 0389.

Chief Executive's Recommendation:

No change

Submission No:

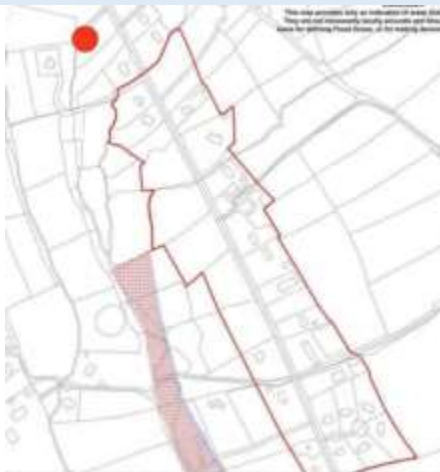
LCDP DR565

Submitted By

Darren Mc Cann

Theme (s):

Settlement Boundary Glenmore

Map showing lands subject to Submission:**Summary of Submission:**

Lands marked with a dot are included within Glenmore Settlement Limit

In support

- Family land
- Submitter resides in Glenmore, details provided regarding employment, national school and Gaelic club.
- Would like to build to site to be close to parents and to work from home

Chief Executive's Response:

There is no requirement for additional land in Glenmore, please refer to DR 0389.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR603
Submitted By	Sinead White
Theme (s):	Settlement Boundary Grange
Map showing lands subject to Submission:	



Summary of Submission:

Request inclusion of lands marked X on Map

In support:

- Boundary would only be extended by 110 metres.
- This site was previously granted full planning permission which has now expired.
- As I currently own this site and plan on returning to Ireland in the near future, building on this parcel of land is my only option.

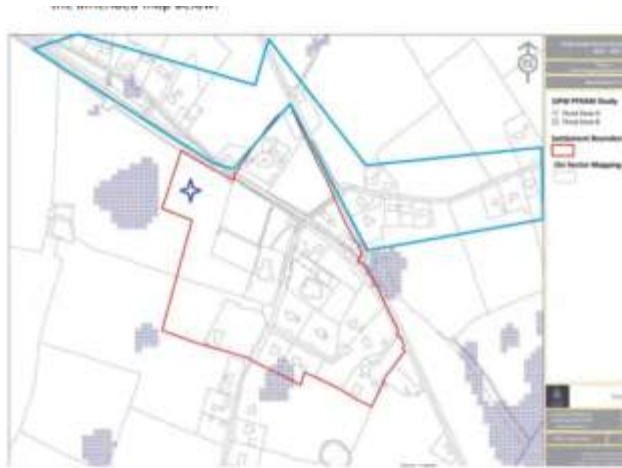
Chief Executive's Response:

- The site is located to the detached from and located north of Grange within Rural Policy Zone 2.
- It is acknowledged that there are some local services and facilities present in Grange including a church and it does benefit from mains water services, however waste water services are not available.
- As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities the Draft Plan has identified lands within the rural nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within the Grange (to the north west and south west) to cater for any demand for housing which may arise of the Plan period. In addition, there are opportunities to provide housing on infill and brownfield lands.
- Furthermore, inclusion of additional lands would result in sprawl detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR290
Submitted By	John Garland
Theme (s):	Settlement boundary Kilcurry
Map showing lands subject to Submission:	



Summary of Submission:

The submission relates to Kilcurry, it is requested that:

1. The settlement area be enlarged to include the lands outlined in blue and
2. Policy Objective EE56 which pertains to whiskey maturation in the open countryside is amended.

In support of the rezoning request it is stated that:

- Funds have been spent on footpaths and public lighting,
- Query as to why the lands marked with a blue star have been included within settlement boundary having regard to the planning history of the site.

In support of the amended policy objective request, it is stated:

Policy Objective	
EE 56	To support the provision of whiskey maturation facilities within the open countryside where the scale of such development is appropriate to the location and surrounding area which is located in reasonable proximity to appropriate levels of infrastructure and road access.

Reference to whiskey maturation should be omitted, no single industry should be given special treatment at the very least there should be a clause stating that no such facility should be placed close to a settlement area or community due to the very valid and sensible reasons highlighted by An Bord Pleanála decision ABP -302032-18

Chief Executive's Response:

- The site is located to the east of Kilcurry within Rural Policy Zone 2. Kilcurry does have a number of community facilities, notwithstanding this it does not benefit from either mains water or waste water services. As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities the Draft Plan has identified lands within the rural nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within Kilcurry (to west) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands. Furthermore, inclusion of additional lands would result in sprawl detrimental to the overall character of the settlement and contrary to national and regional planning policy.
- Policy Objective EE56 of the draft Louth CDP 2021-2027 acknowledges the importance of whiskey maturation as one of Louth's indigenous industries. Notwithstanding this, any application for same will be assessed in accordance Chapter 13, Section 13.11.11

Chief Executive's Recommendation:

No change

Submission No:

LCDP DR330

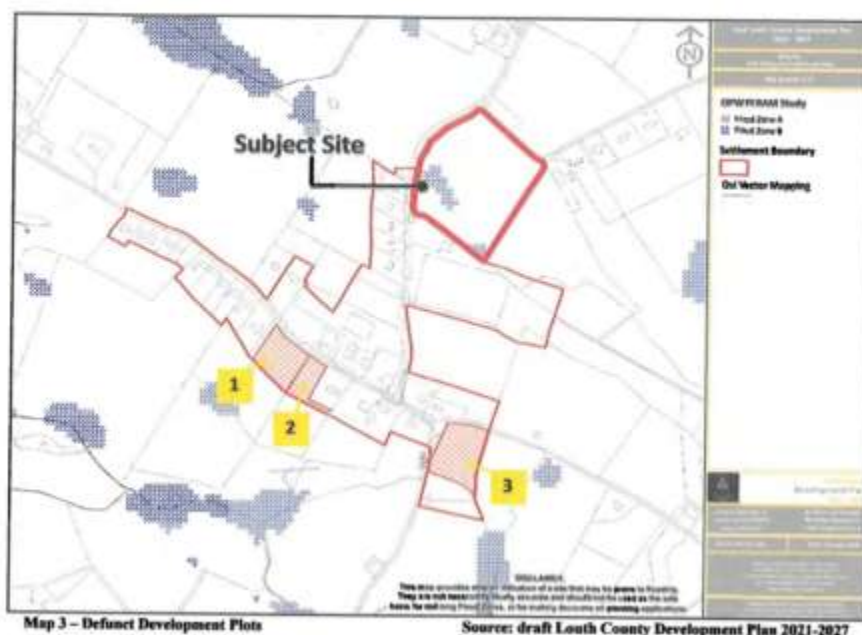
Submitted By

EHP Services on behalf of Mr Andrew Connelly

Theme (s):

Settlement Boundary Kilkerry

Map showing lands subject to Submission:



Summary of Submission:

Request that the village boundary of Kilkerley be amended to include the subject site and to exclude specific plots of ground which lack of developmental interest, see map above.

In support:

- Kilkerley is identified as a level 5 settlement in the draft Louth CDP2021-2027 and should play a function in the County Settlement Hierarchy.
- Table 2.14 states there is a need for 871 additional houses in the Level 5 Settlements.
- Policy Objectives CS2 and CS3 direct future development toward villages.
- Sites 1, 2 and 3 are the only sizeable sites within the village, they have no recent planning history, and lack of interest renders them unsuitable.
- Planning history of the subject site is outlined.
- In accordance with Policy Objectives CS14, CS15, CS16 and SS55 and in the interests of sustainable local growth it is requested that the settlement boundary is amended to include the subject site within the settlement boundary.
- Furthermore, inclusion of the site will provide for the local population who may not qualify for one off or local needs housing.

Chief Executive's Response:

The elevated site is located to the north east of Kilkerley within Rural Policy Zone 2.

It is acknowledged that there are a number of services and facilities available within the settlement including a National school, community hall, chapel, graveyard and Gaelic club. Notwithstanding this, the rural node does benefit for waste water services. As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities the Draft Plan has identified lands within Kilkerley that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within the rural node (to the south) to cater for any demand for housing which may arise of the Plan period. It should be noted that these lands are within the existing urban footprint and as such would facilitate the compact growth. In addition, there are opportunities to provide housing on infill and brownfield lands. The Gaelic club provides a clear demarcation between the rural node to the south and open countryside to the north. The lands identified in this submission are to the north of the Gaelic club, are elevated and open and would result in sprawl which would be detrimental to the overall character of the settlement and contrary to national and regional planning policy.

Chief Executive's Recommendation:

No Change

Submission No.	LCDP DR015
Submitted by:	Gerard Mc Eneaney
Theme (s):	Rezone Lordship
Map showing lands subject to Submission:	



Summary of Submission:

Lordship development centre should include land marked X on attached map (1.5ha)

In support:

- This would enable the landowners three sons to build within a development centre as opposed to Rural Zones 1 and 2,
- The site is located within a 50km speed zone.

Chief Executive's Response:

- The site is located to the west of Lordship and is detached from the settlement boundary. The land rises gradually from the R173, it is located within Rural Policy Zone 1 and within an Area of High Scenic Quality. Regard must be had to this sensitive landscape.
- It is acknowledged that Lordship has some facilities and amenities including a National school, Gaelic club, chapel, graveyard and café. Whilst water services are available the Rural Node does not benefit from waste water services.
- As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities, the Draft Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within Lordship (centrally located to the north of the R173) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands.
- Furthermore, inclusion of additional lands would result in sprawl detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR161
Submitted By	EHP services on behalf of Tom Duffy.
Theme (s):	Rezone Lordship

Map showing lands subject to Submission:



Summary of Submission:

Requested that Railway House is included within the settlement boundary of Lordship

In support:

The dwelling was constructed in 2003 under the 2003-2009 County Plan and at the time was included in the village boundary. Railway House and its curtilage provide a physical and definitive start to the western periphery of the village. The redrawing of the village boundary will have no consequential impact or detrimental inference to the draft Louth CDP 2021-2027.

Chief Executive's Response:

- The site is located to the west of Lordship's settlement boundary and is surrounded by mature vegetation and trees. The land rises gradually from the R173, it is located within Rural Policy Zone 1 and within an Area of High Scenic Quality, regard must be had to this sensitive landscape.
There is no requirement for additional land in Lordship please refer to Points 2, 3 and 4 of DR 0015.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR213
Submitted By	PJ Roddy
Theme (s):	Rezone Lordship

Map showing lands subject to Submission:



Summary of Submission:

Settlement Boundary of Lordship should be amended to include lands marked green on map.

In support:

- Their exclusion would be unjust and unwarranted.
- Their inclusion would ensure development of the village and would not harm its character or amenity.

Chief Executive's Response:

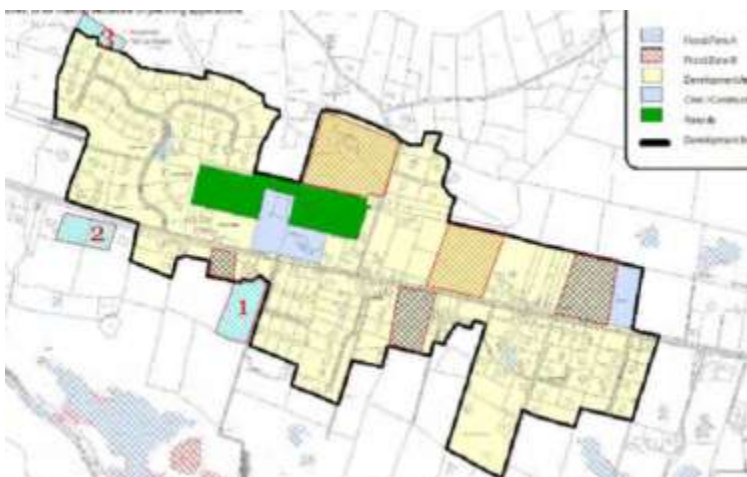
- The site is located to the south of Lordship's settlement boundary in proximity to the coast. It is located within Rural Policy Zone 2.

There is no requirement for additional land in Lordship please refer to Points 2, 3 and 4 of DR015.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR215
Submitted By	Joseph Doherty Associates on behalf of Patrick Hughes
Theme (s):	Settlement Boundary Lordship
Map showing lands subject to Submission:	



Summary of Submission:

Include sites 1 and 2 within the settlement boundary of Lordship.

In support:

There is a shortage of houses within settlement this creates extra pressure for houses in the countryside. Lordship level 4 settlement has some of the best facilities and there is virtually no available land within the settlement for locals to build upon. The client is willing to sell sites to cater for demand.

Plot 1 (0.95ha)

Adjoins built development, has road access, is flat, good soil conditions for waste & surface water disposal. Centrally located and within walking distance of village.

Plot 2 (0.96ha)

Adjoins built development, has road access, is flat, good soil conditions for waste & surface water disposal. Centrally located and within walking distance of village.

Plot 3 (0.4ha)

Adjoins built development, has a right of way through railway village for access and was given an agreement by the land owner of railway village that they would be allowed connections into the sewer system of railway village, along with ESB & water main connections. It has road access, is flat, good soil conditions for waste & surface water disposal. Remains of dwelling on site, it is only accessible through railway village and not practical to take tractors through same. Could be used to provide housing for locals.

Chief Executive's Response:

Site 1: Located to the south of Lordship's settlement boundary in proximity to the coast. It is located within Rural Policy Zone 2.

Site 2: Detached from and located to the south west of Lordship's settlement boundary in proximity to the coast. It is located within Rural Policy Zone 2.

Site 3: Located to the north of Lordship's settlement boundary within Rural Policy Zone 1 and within an Area of High Scenic Quality. Regard must be had to this sensitive landscape.

There is no requirement for additional land in Lordship, please refer to Points 2, 3 and 4 of DR 0015.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR312

Submitted By

Jean O'Neill

Theme (s):

Settlement Boundary Lordship

Map showing lands subject to Submission:**Summary of Submission:**

1. Request to extend boundaries to include lands shown as orange dot therefore enabling children to live in the local area.
2. Objection to rural policy – unfair that children will have to move away, owning their own homes in Dundalk will leave them at a disadvantage, young people are being driven away from the rural area. Unfair that someone who has never lived in the rural area could potentially reside there.

Chief Executive's Response:

1. Request to extend boundaries: Site is located to the south of Lordship's settlement boundary in proximity to the coast. It is located within Rural Policy Zone 2. There is no requirement for additional land in Lordship please refer to Points 2, 3 and 4 of DR 0015.
2. Please refer to Rural Policy General Composite Response.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR133
Submitted By	Lorrac Developments Brady Hughes
Theme (s):	Re zone, Vol 1 Chapter 2, Volume 2 Level 5 Settlements
Map showing lands subject to Submission:	



Figure 1 – Lands in Philipstown



Figure 2 – Lands in Sandpit

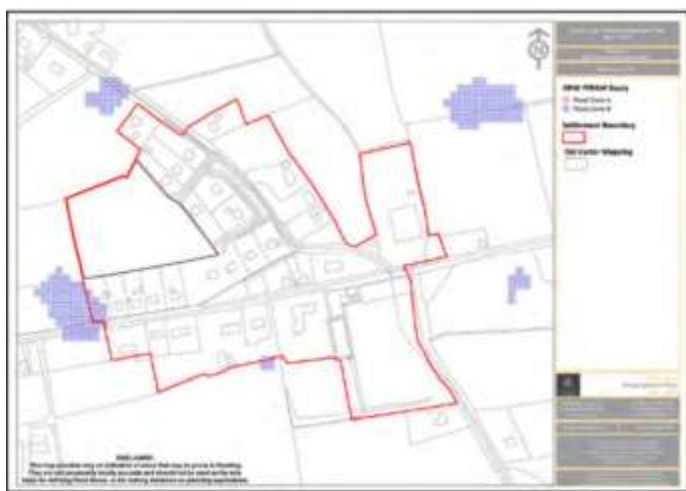


Figure 4 – Amended Philipstown Settlement Boundary

Summary of Submission:

Request:

1. HOU 42 is re worded to require applicant's for housing developments (or purchasers of houses in multi-unit scheme) be required to meet a county based local need which will take into account applicant's family, work, school or other ties within the County in addition to his or her accommodation needs.
2. That the boundary of the Philipstown be changed in accordance with the Map shown in Figure 4 so to include clients lands so that he can continue to develop the site to meet a housing demand.
3. New Plan include a Flooding Flexibility statement acknowledging that the Flood Zone Areas A and B may not be accurate and that if it can be shown by hydraulic modelling flood risk assessments that flooding is not a concern the planning department would be open to consider developing on these lands.

In support:

- Philipstown and Sandpit are two of twenty four Level 5 Settlements.
- Excerpt from Volume 2, Section 2.18 of the draft Louth CDP 2021-2027 is provided.
- It is stated that the draft Plan fails to recognise the role these settlements play in the rural community, that in many cases it has failed to identify lands in rural villages suitable for meeting residential needs and that whilst it states it supports the 'New homes in small towns and villages initiative', there is no tangible effort to do so.
- As per HOU 42 of the draft Louth CDP 2021-2027 local needs qualifying criteria applies to Level 5 Settlements.
- In Philipstown there is literally no land left available to build on, if adopted there will no development until after 2027. Settlement boundaries of all Level 5 settlements should be reassessed.
- Flood Risk Mapping: Some flood areas are out of date, flexibility should be afforded to applicants to include modeling and flood risk assessments, planning authority is requested not be bound by draft plan maps if they are shown to be inaccurate.

Chief Executive's Response:

Please refer to Rural Policy General Composite Response.

- It is acknowledged that there are some local services and facilities present in Philipstown including a National School, however this rural node does not benefit from mains waste water services.
 - As part of the strategy of strengthening the fabric of rural and creating sustainable rural communities the Draft Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. Whilst there is no land available in Philipstown there are opportunities to provide housing on infill and brownfield lands and there is land available in other nearby rural nodes.
 - It is considered that development of the site would contribute to sprawl, as such would be detrimental to the overall setting of this rural node and contrary to national and regional planning policy.
1. In Chapter 10, Section 10.3, Policy Objectives IU 25 and 26 pertain to a site specific flood risk assessment. On foot other the Office of Public Regulators submission to the Draft Plan, this section is to be updated however these policy objectives shall be carried through.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR292

Submitted By

EHP Services on behalf of Paul Ronan

Theme (s):

Settlement Boundary Mountbagnall

Map showing lands subject to Submission:



Location Map

Summary of Submission:

Inclusion of Sites A and B within the settlement boundary of Mountbagnall.

In support:

Planning history for each site outlined. In the Louth CDP 2009-2015 there was a much larger boundary, the village boundary was radically reduced in the 2015-2021 Plan, the draft Louth CDP proposes duplicating the latter.

The purpose of Rural Policy Zone 2 is to limit one off or 'rural needs' applicants.

Mountbagnall is identified as a Level 5 village, as such it should play a part in strengthening the County's Settlement Hierarchy.

Having regard to CS14, CS15, CS16 and SS55, the request to extend boundary is not unreasonable.

Re-alignment of the boundary would complete two very obvious physical and visual gaps

Both sites meet the definition of brownfield/infill, this would be in accordance with Section 4.5 of the NPF and would complete an unfinished estate

Inclusion of the site will not have a demonstrable effect on the Housing Strategy.

Chief Executive's Response:

Site A: Located detached from and located to the west of the settlement boundary of Mountbagnall within Rural Policy Zone 2. Site A is accessed from a local road of the R173, and is not considered to form part of the settlement of Mountbagnall but rather constitutes an individual house along with others that have developed along this road thus it is not considered appropriate to include in same.

Site B: Located to the west of the settlement boundary of Mountbagnall within Rural Policy Zone 2. It is accessed from a cul-de-sac, which is partly located within the settlement boundary of Mountbagnall, having regard to the extent of the cul-de-sac which has developed as well as national, regional and local planning policy which advocates compact growth, it is considered appropriate to include this site and indeed the entire cul-de-sac within the settlement boundary of Mountbagnall.

Chief Executive's Recommendation:

Volume 2, Rural Village Maps, Mountbagnall

Include Site B and entire cul-de-sac within settlement boundary of Mountbagnall

Submission No:	LCDP DR332
Submitted By	EHP Services on behalf of Paul Ronan
Theme (s):	Settlement Boundary Mountbagnall
Map showing lands subject to Submission:	



Summary of Submission:

Inclusion of Sites A and B within the settlement boundary of Mountbagnall.

In support:

Planning history for each site outlined. In the Louth CDP 2009-2015 there was a much larger boundary, the village boundary was radically reduced in the 2015-2021 Plan, the draft Louth CDP proposed duplicating the latter.

The purpose of Rural Policy Zone 2 is to limit one off or 'rural needs' applicants.

Mountbagnall is identified as a Level 5 village as such it should play a part in strengthening the County's Settlement Hierarchy.

Having regard to CS14, CS15, CS16 and SS55, the request to extend the boundary is not unreasonable.

Re-alignment of the boundary would complete two very obvious physical and visual gaps

Both sites meet the definition of brownfield/infill, this would be in accordance with Section 4.5 of the NPF and would complete an unfinished estate

Inclusion of the site will not have a demonstrable effect on the Housing Strategy.

Chief Executive's Response:

Please refer to response for DR 0292

Chief Executive's Recommendation:

No Change

Submission No.	LCDP DR034
Submitted by:	Jacinta Duffy
Theme (s):	Rezone Ravensdale
Map showing lands subject to Submission	



Summary of Submission:

Request that lands marked 'X' on Map are included within Ravensdale.

In support :

This would allow children to apply for planning permission as opposed to lands which are located in Rural Policy Zone 1.

Chief Executive's Response:

- The submission lands are located to the east of Ravensdale within Rural Policy Zone 1. The site is also within an Area of High Scenic Quality, regard must be had to this sensitive landscape.
- It is acknowledged that there are some services and amenities within Ravensdale including a National school, chapel and graveyard. Notwithstanding this, neither water services nor waste water services are available.
- As part of the strategy of strengthening the fabric of villages and creating sustainable rural communities the Draft Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within Ravensdale (to west) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands.
- Furthermore, inclusion of additional lands would result in sprawl detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR434
Submitted By	ECC Design and Engineering Ltd on behalf of Nuala Mc Crystal
Theme (s):	Settlement Boundary Ravensdale
Map showing lands subject to Submission:	



Summary of Submission:

Request that settlement boundary is increased to include lands.

In support:

- Lands are in family ownership.
- Inclusion with settlement boundary would allow for lands to be available for Nuala's three children or local people who want to build close to the area of their birthplace.

Chief Executive's Response:

The submission lands are located to the east of Ravensdale within Rural Policy Zone 1. The site is also within an Area of High Scenic Quality; regard must be had to this sensitive landscape.

There is no requirement for additional land in Ravensdale, please refer to Points 2, 3 and 4 of DR 0034.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR438
Submitted By	ECC Design and Engineering Ltd on behalf of Colm Mc Manus
Theme (s):	Settlement Boundary Ravensdale
Map showing lands subject to Submission:	



Summary of Submission:

Request that settlement boundary of Ravensdale is increased to include lands.

- Submitter owns lands in Ravensdale which was purchased a number of years ago with planning permission for 12 houses under planning Reference No. 10/298, this has now expired.
- It is intended to reapply for permission and also to provide car parking facilities for the adjoining school.
- With the rezoning of the entire north Louth area to 'Rural Policy Zone 1' there are very few sites available for people to build in the area
- This would allow local people to build close to the area of their birthplace and provide much needed car parking for the school and church.

Chief Executive's Response:

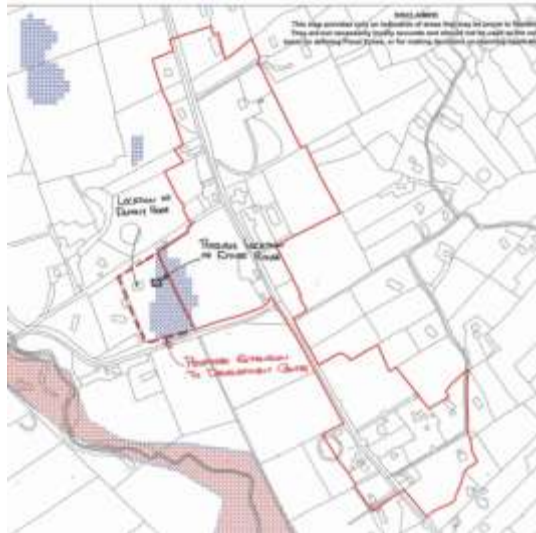
The submission lands are located to the west of Ravensdale on rising land, within Rural Policy Zone 1. The site is also within an Area of High Scenic Quality; regard must be had to this sensitive landscape.

There is no requirement for additional land in Ravensdale, please refer to Points 2, 3 and 4 of DR 0034.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR444
Submitted By	Shirley and Peadar Mc Ardle
Theme (s):	Settlement Boundary Ravensdale or Amended Policy
Map showing lands subject to Submission:	



Summary of Submission:

Request that settlement boundary of Ravensdale is increased to include lands or criteria amended to allow children to build within 300m of settlement boundary.

- The family lives within the boundary of the Development centre of Ravensdale and have lived in the area for generations.
- Home and land purchased in 2012 with outline planning permission for 1 site (planning Ref .No. 10/478). It was purchased on the basis that the site could provide for children in the future.
- If for some reason these lands cannot be included in the development centre we would ask that the current criteria be changed to allow my children build on this site even though it is outside the boundary and within 300m of the boundary.

Chief Executive's Response:

The submission lands are located to the east of Ravensdale within Rural Policy Zone 1. The site is also within an Area of High Scenic Quality, regard must be had to this sensitive landscape.

There is no requirement for additional land in Ravensdale, please refer to Points 2, 3 and 4 of DR034

Please refer to Rural Policy General Composite Response.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR454
Submitted By	P Herr and Associates on behalf of Briege and Laurence Tuite.
Theme (s):	Settlement Boundary Ravensdale
Map showing lands subject to Submission:	



Site 1



Site 2

Summary of Submission:

Request that settlement boundary of Ravensdale is increased to include: Site 1: 1.418ha and Site 2: 1.22ha

In support:

- Lands were previously zoned for residential development in the Louth County Development Plan 2003-2009, the planning authority had deemed them suitable for development.
- Lands are located close to a range of community facilities.
- There is no proposal to extend the settlement boundary, consequently there is limited land for residential development
- Difficult to understand why the settlement boundary of Ravensdale is not extended given the aim of the Plan is to direct housing developments to settlements.

Chief Executive's Response:

Site 1 Located c. 500 west of the settlement boundary of Ravensdale within Rural Policy Zone 1. The site is also within an Area of High Scenic Quality; regard must be had to this sensitive landscape.

Site 2: Located c. 700 north of the settlement boundary of Ravensdale within Rural Policy Zone 1. The site is also within an Area of High Scenic Quality; regard must be had to this sensitive landscape.

There is no requirement for additional land in Ravensdale, please refer to Points 2, 3 and 4 of DR 0034.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR657
Submitted By	EHP Services on behalf of Jim Kirwan
Theme (s):	Settlement Boundary Sandpit
Map showing lands subject to Submission:	



Summary of Submission:

Request that the settlement boundary of Sandpit is revised to include additional lands.

In support:

Sandpits urban form has been heavily influenced by its north-south axis. Ordnance survey maps indicate that the village initially centred on St Mary's Church, a village core was subsequently developed with the opening of business and a National School, expanding north, south and westwards. The pattern of development has effectively amalgamated Sandpit and Milltown.

The villages' unchecked sprawl has been a persistent concern of the submitter, who wishes to provide a counter balance to unconstrained expansion.

Planning Policy Context

A detailed analysis of the NPF has been carried out, Section 4.5, NPO's 3a, 3c and 33 are specifically mentioned. An examination of the RSES's has also been undertaken, RSO2, 4.78 and 4.83 are cited. The Guidelines to Planning Authorities on Sustainable Residential Development in Urban Areas (2009) are also mentioned. -In the Louth CDP 2015-2021, Sandpit is a Level 4 village and Policy SS10 identifies the role of these settlements.

Justification for Revision and Rezoning

In the draft Louth CDP 2021-2027 Sandpit is identified as a Level 5 village. Table 2.14 provides a breakdown of future population. There is a projected population increase of 871 dwellings in the Level 5 settlements and the remaining rural area of the County

The proposed realignment would address urban sprawl southward and concentrate homes toward the core. Blocks of land to the south and east of the village remain undeveloped (map provided showing 3no sites), planning history outlined and flooding issue on one site is highlighted. Alternative sites should be considered, this is in accordance with SS54.

Quantum of undeveloped land equates to 14.44acres, if removed from village boundary this would more than compensate for the 8 acres within the subject site. A revised boundary would be in compliance with CS14, CS15, CS16 and SS55 in the Draft Louth CDP 2021-2027.

Chief Executive's Response:

The site is located to the north of Sandpit within Rural Policy Zone 2. It is acknowledged that there are some services and amenities within Sandpit including a National school, chapel, graveyard and local shop. And, whilst there is a group water scheme available, there is no access to mains waste water services.

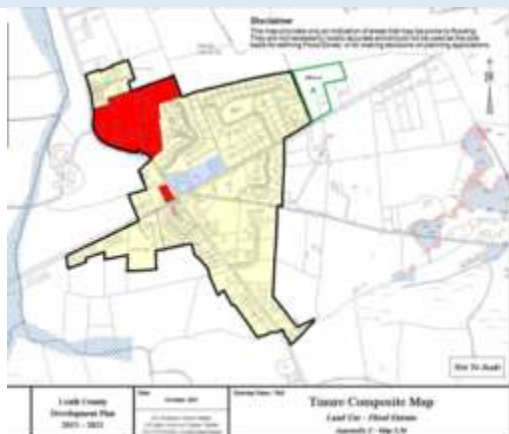
As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities, the draft Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands which are appropriately located within Sandpit (to the east and south) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands.

Furthermore, the site is located to the north of a local road which provides a definitive boundary to the settlement and its inclusion would result in sprawl detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR544
Submitted By	Clare O'Brien
Theme (s):	Re-zone Tinure
Map showing lands subject to Submission:	



Summary of Submission:

Request that lands outlined green on map are included with the settlement boundary and zoned residential.

In support:

- Land was previously zoned for residential use but was taken out of the development plan 2015-2021 due to the number of uncompleted/stalled developments in the Tinure area as well as the public sewage system being at maximum capacity.
- With all current developments in progress and the sewage system upgrade it is requested that these lands are included.
- The outlined area is the next free land on the left side heading from Tinure towards Mullary and is adjoining the current development area.
- It is in close proximity to Tinure school/shop/church and given its location to current housing makes it limited for agricultural uses.

Chief Executive's Response:

The submission lands are located to the east of the settlement within Rural Policy Zone 2. It is acknowledged that there are some services and amenities within Tinure including a National school, chapel, graveyard and business park. Tinure has access to mains water services however, there is no available capacity at the waste water treatment plant. As part of the strategy of strengthening the fabric of villages and creating sustainable rural communities the Draft Plan has identified lands within the rural nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within Tinure (to south west) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands. Furthermore, inclusion of additional lands would result in sprawl detrimental to the overall character of the settlement and would be contrary to National and Regional planning policy.

Chief Executive's Recommendation:

No Change



Section 2h: Chief Executive's Summary, Response and Recommendation on Rural Area

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No:	LCDP DR323
Submitted By	EHP Services on behalf of Carlingford Accommodation Centre
Theme (s):	Identify site on map, Amend wording, Amend policy

Map showing lands subject to Submission:



Summary of Submission:

Subject lands (7ha) are located at Drummullagh, Omeath. It is requested that:

- The site be identified on Rural Policy Zone Map 3.2 as a mid point for tourism and recreational support amenities.
- Section 6.3.1.1 of the draft Louth CDP 2021-2027 should be amended to reference the low key/ low impact services which may be suitable at this location.
- TOU 4 should be amended to read (see underlined):

TOU 4 To promote and facilitate tourism as one of the key economic pillars of the County's economy and major generator of employment and to support the provision of necessary significant increase in facilities, visitor attractions and improvement in urban public spaces and designated rural tourism facilities to promote attractive and vibrant town centres and rural areas as key places for tourists.

In Support:

- Site located along the Great Eastern Greenway,
- Landowner co-operated with LCC in consenting to the greenway traversing property, this has been a benefit to local economy,
- Greenway has 50,000- 73,000 users per year and this is likely to increase with its extension to Victoria Lock. Provision of a walkway alone does not fully capitalise on the recreation facility.
- With regard to Mayo it is stated that amenities such as toilets, rest stops and picnic areas were provided by the private sector, the difficulties of retrofitting these detracted from the overall greenway experience.
- The subject site could provide amenities such as picnic area, seating, food/ drink, bicycle hire/ repair, a small glamping site etc. and this would be in compliance with Chapter 6, TOU 8 and TOU 10 of the draft Louth County Development Plan.

Chief Executive's Response:

- The subject lands are identified as Rural Policy Zone 1 and within an Area of High Scenic Quality (AHSQ). The draft Louth CDP 2021-2027 does not preclude the provision of tourism facilities within Rural Policy Zone 1. Each application will be assessed on its own merits, on a case by case basis.

With regard to a glamping site TOU 29 of the draft Louth CDP 2021-2027 encourages parking and camping sites to locate within existing settlements except in accordance with TOU 30 where there is a justifiable tourism need and this is balanced against environment, social and cultural aspects etc.

Based on the above it is not considered appropriate to identify the site for tourism and recreation support amenities.

- As per above, it is not considered necessary to amend Section 6.3.1.1.
- Having regard to national and regional tourism policy it is considered appropriate to promote town centres as key places for tourists.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR333

Submitted By

Eamon and Hugh Crilly

Theme (s):

Rezone Greenore

Map showing lands subject to Submission:



Summary of Submission:

It is requested that:

- The site (4.03ha) at Millgrange, Greenore. is identified as a future location for tourism and related leisure and recreation activities in Maps 3.2 and 5.10.
- Text and language in the Plan should be amended to align with mapping changes.

In Support:

- The tourism offer in Carlingford and to the NE of the County has resulted in a reduction of available holiday accommodation. Short term holiday lets have been sold or converted to long term.
- Pandemic has impacted upon the local economy.
- The policy provisions in Chapter 6 regarding new tourism development outside settlements are noted. Subject site is uniquely located having regard to proximity of tourism facilities as well as Carlingford Shore SPC and Carlingford Lough SPA
- It is envisaged that the site could be used for low impact uses such as bio tourism, walking and cycling.
- Amending the map and wording would allow the subject site to be utilized for an appropriate form of tourism development and contribute positively to the County's overall tourism offer.

Chief Executive's Response:

- The subject lands are identified as detached from and to the south west of the settlement boundary of Greenore within Rural Policy Zone 2. The draft Louth CDP 2021-2027 does not preclude the provision of tourism facilities within Rural Policy Zone 2 and each application will be assessed on its own merits, on a case by case basis as per TOU 17 and TOU 18 of the draft Plan.
- With regard to tourism accommodation, **the draft Louth CDP 2021-2027** directs tourism based development to Level 1, 2 and 3 settlements (TOU 26). Furthermore, particular emphasis is placed on promoting tourism accommodation in the Regional Growth Centres of Dundalk and Drogheda (TOU 25). Based on the above it is not considered appropriate to identify the site for tourism and recreation support amenities.
- As per above, it is not considered necessary to amend any wording or policies with the draft Louth CDP 2021-2027.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR334
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Submitted By	Anvil Travers
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Theme (s):	Rezoning
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Map showing lands subject to Submission:

No Map submitted but site is located in Rural Policy Zone 1 - Ravensdale Inn Site at Flurrybridge, Carrickcarnon, Co Louth

Summary of Submission:

The Ravensdale Inn Site at Flurrybridge, Carrickcarnon, Co Louth (0.43ha) is located within Rural Policy Zone 1 and it is requested that the site is re-zoned for mixed use.

In support:

- Site is a prime location for redevelopment, having regard to Brexit and its current derelict state; this is a matter of urgency.
- Planning history is outlined including refusals for 3no. service stations (07/1006,09/748 and 10,122).
- 2009-2015 and 2015-2021 plans are very restrictive. 2015-2021 Plan does not cater for change of use of an existing building. This is not in keeping with sustainable planning and regeneration.
- Site is in need of regeneration, is an eyesore and attracts anti social behavior.
- It is strategically located adjacent to the N1/A1 Junction, has connectivity to air and sea ports thereby domestic and international markets.
- Proposed redevelopment should be mixed use; service station with first floor office accommodation, agricultural shop, commercial shop or restaurant/ café.
- With the onset of Brexit there is a high demand for facilities along the border.
- Office accommodation in this location is considered a resource based development of regional or national importance; the site is ideally located along the M1 and adjacent to a large hotel.

Chief Executive's Response:

No map has been submitted but the Ravensdale Inn is located within Rural Policy Zone 1 and within an Area of High Scenic Quality, there is an existing building and associated car park on site. The building was formerly utilised as a night club. The advantageous location of the site is noted.

The provision of a 'Mixed Use' zoning on this site would be contrary to national and regional planning policy which promotes sustainable compact growth and improved environmental quality. The draft Louth CDP 2021-2027 advocates that business, commercial and residential uses locate to urban settlements where there are serviced sites available, particularly the Regional Growth Centres of Dundalk and Drogheda (Policy Objectives EE 1, EE3, EE27, EE28 and EE29).

Furthermore, re zoning of this site would result in the area becoming a destination in its own right, giving rise to additional traffic generation and movements on a protected regional route (R132) in addition to traffic movements at the adjoining rural motorway interchange.

It is acknowledged that the Flurry Bridge Inn did operate on the subject lands. Section 13.19.2.4 of the Draft County Development Plan 2021-2027 sets out how 'Non-conforming uses' i.e. established uses that do not conform to the zoning of the lands will be assessed. In this regard such proposals will take account of the general principles of proper planning and sustainable development.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR343
Submitted By	EHP on behalf of Niall Clarke
Theme (s):	Rezoning Carrickcarnon , Chapter 5, Amend Policy and text
Map showing lands subject to Submission:	



Summary of Submission:

- Define and expand Carrickcarnon Economic/ Business Zone to include lands above, make appropriate changes to Rural Policy Map 3.2
- Amend Policy Objective EE 60 and associated text in the draft Louth CDP 2021-2027.

Policy Objective EE1 encourages economic development along the Dublin- Belfast Economic Corridor.

Section 5.19.3 of the draft Plan relates to the Carrickcarnon Economic Business Zone at (CEBZ). The rural policy map provides a very small and undistinguished blue dot. Previous discussions with the planning authority have stated that the principle designation is the Carrickdale Hotel and Leisure Complex as well as, Centrepoint Business Park - to the exclusion of other surrounding businesses. Centrepoint is very successful but constrained by the R132 and Newtown Roads.

The CEBZ is restrictive and will not realise the area's full potential i.e. proximity to Northern Ireland, excellent road network, proximity to Junction 20 of the M1. The general area including the submitters land is an ideal location for employment and a focus for the draft Plan's Brexit orientated objectives in particular EE1, EE3, EE12, EE15, EE16 and EE13.

A more definitive map is required, the lands identified in the Map above should be included in same.

It is also suggested that EE60 is amended accordingly:

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

Likewise the language in Chapter 5 should also be amended accordingly.

The existing premises on site (commercial diesel station, fuel storage tanks with yard and light industrial buildings) has scope to accommodate additional commercial, light industrial, storage and logistics and warehousing units. This land block can be accessed along the Edentober Road and old Newry Road (R132)

Development of the site will not introduce any use which isn't already occurring in the surrounding area.

Chief Executive's Response:

The site is located within Rural Policy Zone 1 and within an Area of High Scenic Quality.

Given the rural character of the area it is considered that the Carrickcarnon Economic Business Zone is of an appropriate size and scale.

Furthermore, an extension to same would be contrary to national and regional planning policy which promotes sustainable compact growth and improved environmental quality. The draft Louth CDP 2021-2027 advocates that business, commercial, industrial, storage units and warehousing locate to urban settlements where there are serviced sites available, particularly the Regional Growth Centres of Dundalk and Drogheda (Policy Objectives EE 1, EE3, EE27, EE28 and EE29).

Moreover, the rezoning of this site would give rise to additional traffic generation and movements on a protected regional route (R132) and additional traffic movements at the adjoining rural motorway interchange.

Policy Objective EE60 and associated text is considered appropriate and allows for the consideration of commercial type developments relative to its location. Any proposals will be considered on its own merits and in accordance with the provisions of Chapter 13 of the draft Plan.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR346
Submitted By	Patrick Tiernan
Theme (s):	Rezone Faughart

Map showing lands subject to Submission:



Summary of Submission:

Rezone lands from Rural Policy Zone 1 to Tourism related Commercial Use.

In support of the request the following information is provided:

- Site is located in a prime location at a junction along the M1 Dublin to Belfast Corridor.
- A state of the art hotel would be an attractive architectural feature along M1.
- A hotel would make a contribution to the economic development of Dundalk and the Region, (excerpt from Fáilte Ireland's Report in 2018 is provided)
- Attractions in the vicinity are listed.
- There is a shortage of hotel beds in Dublin (Developing Tourism 2020 conference), Dundalk is well positioned to cater for extra demand.
- Having regard to Brexit there is also a demand for a conference centre. Submission questions why Dublin is being targeted for same; Dundalk would be a suitable location.
- The NPF emphasises Dundalk's role in attracting Foreign Direct Investment.
- The RSES's support targeted growth of Dundalk as a Regional Growth Centre. RPO 31 is cited. The submission lands are located along the Dublin to Belfast Economic corridor and their development would be compliant with the RSES.
- Proposal is in accordance with national and regional planning policy.

Chief Executive's Response:

The submission lands are located within Rural Policy Zone 1 and are presently in agricultural use.

The provision of a hotel/ conference centre on this site would be contrary to national and regional planning policy which advocates sustainable compact growth and improved environmental quality. The draft Louth CDP 2021-2027 promotes and supports the development of additional tourism accommodation at appropriate locations throughout the County, however it directs tourism based development including hotels to Level 1, 2 and 3 settlements (TOU 26). Furthermore, particular emphasis is placed on promoting tourism accommodation in the Regional Growth Centres of Dundalk and Drogheda (TOU 25).

Moreover, rezoning of the site would result in increased traffic generation and additional traffic movements at the adjoining rural motorway interchange.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR512

Submitted By

Niall Duffy

Theme (s):

Rezone Jenkinstown

Map showing lands subject to Submission:**Summary of Submission:**

Rezone from Rural Policy Zone 1 to Commercial/ Industrial

- We own and operate the workshop, storage and office units at Jenkinstown Business Park.
- Planning Permission for the development was granted under planning Ref. No. 01/499 and the premises were constructed in and around 2003.
- Lands zoned 'Rural Policy Zone 1'.
- We wish to have the lands shown outlined in Red rezoned as Commercial/ Industrial use as this is currently what the site is used for.

Chief Executive's Response:

The site is located with Rural Policy Zone 1 in an Area of High Scenic Quality.

Planning permission was granted for a workshop, storage and office unit under planning reference 01/499. Under planning reference 03/688 planning permission was also sought to demolish the existing workshop and stores and to construct a new workshop/ storage unit. This planning application was subsequently refused by Louth County Council and An Bord Pleanála on the basis that it would result in the intensification of an industrial use in an Area of High Scenic Quality.

Having regard to the location of the site within the rural area and its sensitive landscape setting it is not considered appropriate to rezone the lands to General Employment (E1) nor Business and Technology (E2).

Notwithstanding the above the Draft Louth CDP 2021-2027 (Chapter 13, Section 13.19.2.4) sets out how 'Non-conforming uses' i.e. established uses that do not conform to the zoning of the lands will be assessed. In this regard, such proposals will take account of the general principles of proper planning and sustainable development.

Chief Executive's Recommendation:

No Change

Submission No:

LCDP DR832

Submitted By

David Mc Connell

Theme (s):

Land Use Zoning, Chapter 3

Map showing lands subject to Submission:

Summary of Submission:

Submission concerns a site outside the settlement boundary of Faughart.

When the site which is within a cul-de-sac was initially purchased there were no restrictions in place regarding residency (copy of permission included). Recently a person who resides in Faughart (Level 4 settlement in the Louth CDP 2015-2021), applied for planning permission to build on the site and their application was refused on the basis that they not qualify to live in the rural area.

The submission requests that either the definition of the 'rural area' is changed or that the lands are rezoned, thereby allowing people with the geographical area purchase a site.

It is stated that development of the site will improve the overall amenity of the cul-de-sac.

Photos of the site are included

Map showing lands subject to Submission:

The site is located within Rural Policy Zone 1 within an Area of High Scenic Quality c. 1km north of Level 5 settlement of Faughart. Having regarding to national, regional and local planning policy concerning sustainable development, compact growth and environmental quality it is not considered appropriate that these lands are re zoned to residential.

Please refer to Rural Policy General Composite Response.

Map showing lands subject to Submission:

No Change