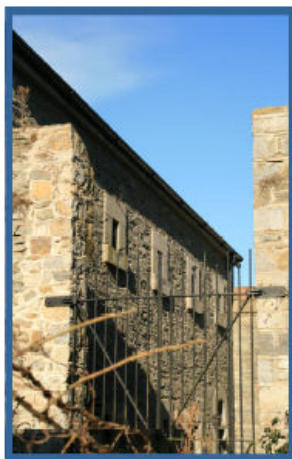


Manager's Report on Submissions to  
the Proposed Material Alterations to  
the Draft Plan

# Ardee Local Area Plan

2010 – 2016



February 2011

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## Part 1: Introduction

This report focuses on the submissions and observations received from the public following the publication of the Proposed Material Alterations to the Draft Ardee Local Area Plan 2010 - 2016 and the Manager's response to the issues raised. It has been prepared under Section 13(k) and (l) of the Planning and Development (Amendment) Act 2010.

There are 3 stages in the review process. These are detailed below.

### Stage 1 – Pre-draft

- Background work, data gathering
- Initial notification in newspaper of planning authority intention to prepare a new Local Area Plan.
- Public consultation including prescribed bodies, service provider etc.
- Preparation of screening exercise for strategic environment assessment (SEA) and appropriate assessment (AA).

### Stage 2 – Preparation of Draft Plan

- Submission, by manager of a draft plan to members for their consideration
- Consideration by members of draft plan including the making of amendments by members
- Sending notice and a copy of the draft plan to specified bodies. Public display of draft plan and environmental report, and invitation of submissions

### Stage 3 – Making of Local area plan

- Preparation by the manager of a report on submissions received.
- Consideration by members of the draft plan and managers report.
- Making of the local area plan by accepting or amending the draft, **except** where amendment represents a material alteration of the draft plan. In this case material amendments go on public display including amending environmental report if necessary.
- *Preparation of manager's report on submissions.*
- *Consideration of the amendment and managers report by the elected members.*
- *Members making the plan.*

The Council is now at the latter part of stage 3. This report is to the members and outlines the manager's response to issues raised in submissions to the proposed material alterations to the Draft Plan and the manager's recommendation on the incorporation of such issues in the local area plan.

***This report should be considered in conjunction with the Draft Ardee Local Area Plan 2010 - 2016 and the subsequent report titled Proposed Material Alterations to the Draft Ardee Local Area Plan 2010 – 2016, dated 5<sup>th</sup> January.***

## **Legislative Requirements**

Under the Planning and Development Acts 2000 to 2010, the County Manager is required to prepare a report on the submissions and observations received in respect of the proposed material alterations to the draft plan, to respond to the issues raised and to make recommendations in relation to the proposed material alteration to the draft local area plan. It is the role of this report to comply with the foregoing requirement. The report forms part of the statutory procedure for preparing a new local area plan, Section 13(k) and (l) of the Planning and Development (Amendment) Act 2010 sets out the requirements in relation to the preparation of a Manager's Report.

## **Purpose of this Report**

The function of this report is to help inform and assist the members in consideration of the proposed material alterations of the draft plan. Following consideration of the manager's report by the members, the local area plan is then made or amended as appropriate, with all, some or none of the proposed material alterations. (Section (13) (n) Planning and Development (Amendment) Act 2010).

## **Outline of Report**

The Proposed Material Alterations to the Draft Ardee Local Area Plan 2010 – 2016 were made available to the public until the 2<sup>nd</sup> February 2011. Copies were made available in council offices and major libraries in the County. It was available to purchase from the County Hall, made available on a CD ROM and for download from Louth County Council web site. Copies of the CD Rom were also sent to the minister, An Bord, prescribed authorities and community associations and other agencies as required by the Planning and Development Acts 2000 to 2010.

11 submissions and observations were received on the proposed material alterations to the Draft Plan during the statutory period. All written submissions received were acknowledged. They are now summarised individually, the response of the manager is given on the issues and finally the manager's recommendations on amendments to be included in the Ardee Local Area Plan 2010 - 2016.

## **Contents of Managers Report**

The Manager's Report is required to:

1. List of the persons who made submissions or observations,
2. Summarise the issues raised by the persons or bodies in the submission,
3. Contain the opinion of the manager on the issues raised and his recommendations in relation to the proposed material alteration to the draft local area plan. In this regard the manager's response must take into account:
  - a) The proper planning and sustainable development of the area
  - b) The statutory obligations of any local authority in the area,
  - c) Any relevant policies or objectives of the government, or of any Minister of the Government.

## **Manager's Report to the Elected Members**

The Manager's Report is submitted to the members of the planning authority. Following the consideration of the proposed material alterations of the draft local area plan and the report of the manager, the local area plan shall be made or amended as appropriate by the planning authority by resolution, with all, some or none of the material alterations ass published.

***In making the local area plan, Section 13(r) of the Planning and Development Act 2010 states that the members shall be restricted to considering the proper planning and sustainable development of the area to which the local area plan relates the statutory obligations of any local authority and to have regard to relevant government policies and guidelines.***

## Part 2: List of Persons and Bodies who made Submissions

| No. | Name                                                                    | Address                                                                                                        |                       |
|-----|-------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-----------------------|
| 1   | Vincent Mathews                                                         | Dromin, Dunleer, Co Louth                                                                                      |                       |
| 2   | Stephen Ward                                                            | Distillery House, Distillery Lane,<br>Dundalk, Co Louth                                                        | Rathgory Developments |
| 3   | EPA                                                                     | SEA Section<br>Office of Environmental<br>Assessment, EPA<br>Regional Inspectorate, Inniscarra,<br>County Cork |                       |
| 4   | Dept. of<br>Environment,<br>Heritage & L.Gov                            | Planning System & Spatial<br>Policy, Custom House,<br>Dublin 1                                                 |                       |
| 5   | DPP                                                                     | 4 <sup>th</sup> Floor Scottish Mutual Building,                                                                | Tesco Ireland         |
| 6   | Vincent Mathews                                                         | Dromin, Dunleer, Co Louth                                                                                      |                       |
| 7   | Dept. of<br>Communications,<br>Energy & Natural<br>Resources<br>(DCENR) | Elm House, Earlsvale Road,<br>Cavan                                                                            |                       |
| 8   | RGDATA                                                                  | Rock House, Main Street,<br>Blackrock, Co. Dublin                                                              |                       |
| 9   | Thomas Kearney                                                          | Kearney's, Castle Street , Ardee                                                                               |                       |
| 10  | NRA                                                                     | St Martin's House, Waterloo<br>Road, Dublin 4                                                                  |                       |
| 11  | Stephen Ward                                                            | Distillery House, Distillery Lane,<br>Dundalk, Co Louth                                                        | Escadia Ltd           |

**Part 3 Consists of a summary of the issues raised, the Manager's Opinion on the issues raised and the Manager's Recommendations on the incorporation of such issues.**

| No. | List of Persons                                                                        | Issues                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Manager's Opinion                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Manager's Recommendation                                                   |
|-----|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| 1   | Vincent Matthews<br>Dromin,<br>Dunleer                                                 | <p>This is one of two submissions made by the landowner of the land to the north of Sean O Carroll Street, which it is proposed as a material alteration to zone commercial retail (RT). (See submission 6) These submissions seek to change the boundaries of the zoned area while retaining the overall area as per attachments. Both submissions are quite similar.</p> <p>The land owner seeks that this submission be superseded by submission 6.</p> | <p>This submission and submission 6 propose to reconfigure the boundaries but do not propose to increase the area of land zoned for commercial retail (RT). I do not consider that the proposed reconfiguration of the boundaries in this instance would constitute a material alteration to the proposed material alterations to the land use map dated 5<sup>th</sup> January.</p> <p>Hence I do not have an objection to the proposed alterations to the boundary of this site.</p> | Amendment to Draft Plan in accordance with recommendation to submission 6. |
| 2.  | Stephen Ward Town Planning Consultants<br>Ltd on behalf of Rathgory Development s Ltd. | <p>This submission is on behalf on Rathgory Developments. It seeks that the wording of the proposed amendment to policy DEV3(1) is amended to include:</p> <p><i>-for the purposes of clarity 'committed dwelling units' includes lands that have received notification of decision to grant planning permission.</i></p>                                                                                                                                  | I note this submission does not relate to the proposed amendments to policy DEV3 (1) on public display, therefore this submission is not admissible and cannot be considered at this stage.                                                                                                                                                                                                                                                                                            |                                                                            |
| 3   | SEA Section<br>Office of Environment<br>al Assessment,<br>EPA,<br>Inniscarra,<br>Cork  | <p>The agency acknowledges the Council's position in relation to the need for SEA and welcomes the inclusion of points raised in their previous submission.</p> <p>This submission advises that the drinking water supply in Ardee is currently on the Agency's Remedial Action List as a result of excessive levels of aluminium. It should be ensured that adequate and appropriate treatment of drinking water is</p>                                   | <p>A number of measures have been undertaken by Louth County Council to address the issues under the EPA Remedial Action List. It is anticipated that all required works will be completed by the end of February 2011.</p> <p>I am satisfied that the draft plan and policy therein appropriate address water supply to</p>                                                                                                                                                           | Amendment to Draft Plan is not recommended                                 |

|   | provided to service the current and projected population growth in the Plan area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | service the current and projected population growth in the Plan Area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| 4 | <p>Department of Environment, Heritage &amp; Local Government, Custom House, Dublin 1</p> <p>The Department acknowledges that a number of comments made in relation to the draft plan have been taken into account. A number of the issues raised in submission are not specific to the Draft Ardee Local Area Plan.</p> <p>Policies HR4 of the Draft Dunleer LAP and DEV 6 of the Ardee LAP as follows, are the same.</p> <p>‘To restrict the duration of a permission for residential development or where residential development forms a part of the development to five years, <u>except for instances where an application is made to extend the appropriate period in accordance with section 42 (as amended) of the Act 2010</u>’.</p> <p>This submission considers that the wording as underlined could be misinterpreted. In terms of the Act an application for an extension of duration of up to an additional five years would only be possible if the application for extension meets with the requirements as set out in the Act.</p> | <p>For the purpose of clarification I propose the following amendment relative to the wording of policy DEV 6 and text as set out below.</p> <p>DEV 6 – ‘To restrict the duration of permission for residential development or where residential development forms a part of the development to five years’.</p> <p>Text – ‘An extension of the appropriate period over and above the initial five years will be considered if the application for extending the appropriate period meets with the requirements as set out in Section 42 of the Act (as amended).’</p> | <p>Recommend that policy DEV 6 and text be amended as follows:</p> <p>DEV 6 – ‘To restrict the duration of permission for residential development or where residential development forms a part of the development to five years’.</p> <p>Text – ‘An extension of the appropriate period over and above the initial five years will be considered if the application for extending the appropriate period meets with the requirements as set out in Section 42 of the Act (as amended).’</p> |
| 5 | <p>DPP, 15 Harcourt Street Dublin 2 on behalf of Tesco Ireland Limited.</p> <p>This is a lengthy submission which relates to lands located on the Drogheda Road owned by Tesco Ireland Ltd.</p> <p>It is also one of a four of submissions which objects to the proposed inclusion of the Land Use Zoning Category and Objective (RT) To provide for the development of a modern format supermarket of up to 2,500m<sup>2</sup> of a net retail floorspace (including food and non-food floorspace) in relation to two sites off Sean O’Carroll Street.</p> <p>Tesco’s previous submission to the Draft Ardee Local Area Plan has also been attached to this submission.</p>                                                                                                                                                                                                                                                                                                                                                                         | <p>Firstly, it is the stated priority and preference of the Draft Plan to direct retail development into the town centre in order to strengthen and preserve the town centre as the main focus for such development.</p> <p>I consider that the proposed land use zoning objective (RT) to allow large retail development would be contrary to objectives of the Retail Planning Guidelines for Planning Authorities (DOE) 2005, the Louth Retail Strategy 2009, the Louth County Development Plan and the aims of this plan to</p>                                    | <p>Amendment to Draft Plan is not recommended.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>preserve and strengthen the town centre as the main focus for retail and commercial development and protect its vitality and viability.</p> <p>It is at the elected members request that a proposed material alteration has been included in relation to a new zoning objective for commercial retail (RT).</p>                                                                                                                                                                                                                                                                     |  |
|  | <p>This submission comprises of 4 subsections:</p> <p>1. <u>Key Points</u></p> <ul style="list-style-type: none"> <li>• Considers that the planning authority has sidelined a valuable edge of centre site suitable for the location of a supermarket disregarding government, regional and local retail policy. Furthermore, the Plan is promoting out of centre sites retail sites which have been the subject of two refusals from the Board.</li> <li>• The results of a survey carried out on behalf of Tesco found that town centre traders have rejected the Roger's and Matthew's site as being the best location for a new supermarket and that the preferred location was off the Drogheda Road.</li> <li>• States that the planning authority is promoting leap-frog in respect of Matthew's site in that it is considered suitable for both a supermarket and phase I in the housing strategy.</li> </ul> | <ul style="list-style-type: none"> <li>• Having regard to government, regional and local retail policy it is the stated priority and preference of the Draft Plan to direct retail development into the town centre in order to strengthen and preserve the town centre as the main focus for such development.</li> <li>• Noted</li> <li>• It is at the elected members' request that a proposed material alteration has been included in relation to a new zoning objective for commercial retail (RT) on two sites, one of which is on Mr Mathew's land. The residential</li> </ul> |  |

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|  |  | <ul style="list-style-type: none"> <li>• Considers that a resistance has been placed in front of their client by the Council in respect of environmental concerns on their site which is a 'closed landfill'. State that the remediation of the subject site is the responsibility of the Council and that demands on council resources could be ameliorated if the lands benefited from a commercial/retail zoning as opposed to the existing residential zoning.</li> <li>• Tesco is promoting an edge of centre location -c190 metres. States that their site is closer to the area of main activity in the retail core than Irish Street.</li> <li>• Considers that the planning authority's retail policy has shifted dramatically.</li> <li>• Client does not support the residential phasing strategy as included in the draft plan in that it seeks to address the imbalance of residential developments north and south of the River.</li> <li>• Proposed supermarket on Sean O Carroll Street would add to traffic congestion in town centre and vicinity of the site.</li> </ul> | <p>phasing strategy prioritises the development of committed dwelling units within the local plan boundaries.</p> <ul style="list-style-type: none"> <li>• The environmental concerns referred to are appropriately being given due consideration under the development management process.</li> <li>• Noted</li> <li>• The proposed material alteration in respect of the commercial retail zoning objective would represent a dramatic shift in the planning authority's retail policy.</li> <li>• These comments do not relate to any of the proposed amendments on public display and therefore cannot be considered at this stage.</li> </ul> |  |
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|  |  | <p>2. <u>Review of Proposed Retail Related Amendments</u></p> <ul style="list-style-type: none"> <li>Considers that the proposed commercial retail rezoning objective (RT) represents improper and unsustainable planning. While it is recognised that the Manager's has sought to prevent this zoning and that he considers that new retail can be accommodated in the town centre. However this submission does not consider that a supermarket will be accommodated in the town centre.</li> </ul> <p>3. <u>Recommendations</u></p> <ul style="list-style-type: none"> <li>In respect of commercial retail zoning (RT) –reinstate previous zoning objective as per draft plan.</li> <li>Alternatively extend zoning objective to include Tesco land off Drogheda Road and include 'subject to the application of the sequential approach as set out in the Retail Planning Guidelines 2005.</li> <li>Reduce area of land zoned RT on Sean O'Carroll Street to facilitate the rezoned on the Tesco lands to RT. As this submission considers that the proposed RT zoning objective is not as required by S20(r) of the Planning and Development (Amendment) Act 2010 in the <i>interest of the proper planning and sustainable development of the area</i>, it advocates that the amendments proposed above would bring the LAP back in line with this legal principle and would be overriding in a court of law.</li> </ul> | <ul style="list-style-type: none"> <li>It is at the elected members request that a proposed material alteration has been included in relation to a new zoning objective for commercial retail (RT).</li> <li>This is a matter for the elected members.</li> <li>Section 13(q) of the Planning and Development Act 2010 states that <i>a further modification to the material alteration shall not be made where it refers to an increase in the area of land zoned for any purpose</i>. Hence the extension of the RT zoning to include land off Drogheda Road cannot be considered.</li> <li>This proposal to change the rezoning of this site from residential would constitute a significant material amendment to the land use zoning as detailed in the draft plan and proposed material alterations as on public display and thus cannot be considered at this stage of the plan making process. Furthermore the rezoning proposed would represent a fundamental departure to the policy of</li> </ul> |  |
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|   |                                                              | <ul style="list-style-type: none"> <li>The subject lands are zoned residential. This submission seeks that policy DEV II is amended to remove phase III 'as stock of vacant lands (from development) becomes exhausted, that is 75% is built on, the presumption will move towards the release of land in Phase II. Furthermore, that the following sentence be removed from DEV III 'Development of these lands is subject to the availability of physical and social infrastructure'.</li> <li>Seeks that Note 4 of matrix zoning matrix is amended as follows 'A local shop is defined as a convenience retail unit of not more than 1,500 m<sup>2</sup> in gross floor area' as opposed to 100m<sup>2</sup>.</li> </ul> | <p>the draft plan and therefore would seriously prejudice the objective of the plan in relation to the town centre.</p> <ul style="list-style-type: none"> <li>These comments do not relate to any of the proposed amendments on public display and therefore cannot be considered at this stage.</li> </ul>                                                                                                                                        |                                                                                                  |
| 6 | Vincent Matthews<br>Dromin,<br>Dunleer                       | <p>This is one of two submissions made by the landowner of the land to the north of Sean O Carroll Street, which it is proposed as a material alteration to zone commercial retail (RT). (See submission 1) These submissions seek to change the boundaries of the zoned area while retaining the overall area as per attachments. Both submissions are quite similar.</p> <p>The land owner seeks that this submission supersedes submission 1.</p>                                                                                                                                                                                                                                                                        | <p><b>This submission and submission 1 propose to reconfigure the boundaries but do not propose to increase the area of land zoned for commercial retail (RT). I do not consider that the proposed alteration of the boundaries in this instance would constitute a material alteration to the material alterations.</b></p> <p><b>Hence I do not have an objection to the proposed alterations to the boundary of this site.</b></p> <p>Noted.</p> | <p><b><u>Amendment to Draft Plan is recommended as per map attached to submission 6.</u></b></p> |
| 7 | Dept. of Communications, Energy and Natural Resources, Cavan | No observations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Amendment to Draft Plan is not recommended.                                                      |

|   |                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                             |
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| 8 | RGDATA<br>Rock House,<br>Main Street,<br>Blackrock,<br>Co Dublin. | <p>RGDATA is the representative association for independent family owned grocery shops in Ireland, supporting sustainable retail development. Issued raised in this submission are summarised as follows:</p> <ul style="list-style-type: none"> <li>• Shopping provision is a key component of town centres and makes a valuable contribution to their vitality and viability. Therefore additional investment in retail development projects should be in the town centre.</li> <li>• In relation to the proposed zoning objective (RT), reference is made to the Board's Inspector recommendation for refusal which stated '<i>In view of the economic downturn and over estimated catchment population for the proposed supermarket, I conclude that the need for an additional 2500 sq.m. of net retail floor space for convenience goods should be treated with caution if the overarching requirement is to protect the traditional functions of the core retail area in Ardee's town centre is to be respected</i>' This submission agrees with the comments made.</li> <li>• Considers that points 9 and 10 in relation to the land use zoning matrix re: provision of a single modern format supermarket of up to 2,500m<sup>2</sup> of net retail floor space and petrol station respectively, are contrary to the County Development Plan and Retail Planning Guidelines.</li> <li>• With reference to policies of the County Development Plan 2009 – 2015 and the Retail Planning Guidelines 2005 having regard to the location of retail development, this submission specifies that the proposed RT zoning is located 600 metres from the town centre which exceeds the recommended distance of 300 – 400 metres.</li> <li>• Refers to managers response '<i>amendments to Plan is not recommended</i>' in relation to submissions 6, 12</li> </ul> | <p>This is one of a four of submissions which objects to the proposed inclusion of a Land Use Zoning Category and Objective (RT) To provide for the development of a modern format supermarket of up to 2,500m<sup>2</sup> of a net retail floorspace (including food and non-food floorspace) off Sean O'Carroll Street.</p> <p>It is the stated priority and preference of the Draft Plan to direct retail development into the town centre in order to strengthen and preserve the town centre as the main focus for such development.</p> <p>I consider that the proposed land use zoning objective (RT) commercial retail, to allow large retail development would be contrary to objectives of the Retail Planning Guidelines for Planning Authorities (DOE) 2005, the Louth Retail Strategy 2009, the Louth County Development Plan and the aims of this plan to preserve and strengthen the town centre as the main focus for retail and commercial development and protect its vitality and viability.</p> <p>It is at the elected members request that a proposed material alteration has been included in relation to a new zoning objective for commercial retail (RT).</p> | Amendment to Draft Plan is not recommended. |
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|   |                                                         | and 21 of the manager report on submissions received to the Draft Plan in respect of large scale retail developments on these sites.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                            |
| 9 | Thomas Kearney<br>Kearney's,<br>Castle Street,<br>Ardee | <p>This submission relates to the proposed new commercial retail (RT) zoning in Cappocksgreen. It objects to any more land being rezoned retail in Ardee at this time.</p> <ul style="list-style-type: none"> <li>• It refers to An Bord Pleanála decision to refuse a similar retail development and concludes that since this decision was made that the retail sector in Ireland has contracted by extraordinary levels and thus this decision is more relevant than ever.</li> <li>• Seeks that existing vacant units in the town centre be occupied prior to additional retail zoning.</li> </ul> | <p>This is one of a four of submissions which opposes the proposed inclusion of a Land Use Zoning Category and Objective (RT) To provide for the development of a modern format supermarket of up to 2,500m<sup>2</sup> of a net retail floorspace (including food and non-food floorspace) off Sean O'Carroll Street.</p> <p>It is the stated priority and preference of the Draft Plan to direct retail development into the town centre in order to strengthen and preserve the town centre as the main focus for such development.</p> <p>I consider that the proposed land use zoning objective (RT) commercial retail, to allow large retail development would be contrary to objectives of the Retail Planning Guidelines for Planning Authorities (DOE) 2005, the Louth Retail Strategy 2009, the Louth County Development Plan and the aims of this plan to preserve and strengthen the town centre as the main focus for retail and commercial development and protect its vitality and viability.</p> <p>It is at the elected members request that a proposed material alteration has been included in relation to a new zoning objective for commercial retail (RT).</p> | Amendment to Draft Plan is not recommended |

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| 10 | NRA , St<br>Martin's<br>House,<br>Waterloo<br>Road, Dublin<br>4                        | <p>First this submission states that the NRA were not formally consulted on the Draft Local Area Plan</p> <p>Seeks that the Draft Plan and proposed amendments be assessed in context of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities prior to adoption.</p> <p>This submission details the sections of the guidelines that relate to development on/affecting existing national routes in the interest of ensuring that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future.</p> <p>A particular issues the NRA states that needs to be addressed in the Plan are:</p> <ul style="list-style-type: none"> <li>• the extent of residential development lands to the south of the town adjoining the N2</li> <li>• the residential and industrial related uses identified to the north east of the town adjoining the N33 and N52.</li> <li>• Tourism and leisure zoning objective to the north of the town adjoining the N33 and N52.</li> </ul> | <p>For the purpose of clarification, the NRA is not a prescribed authority for the purposes of section 20(e) of the Planning and Development Act, 2000 or section 13(e) of the Planning and Development Act 2010 and hence the planning authority is not required to send notice of the proposed material alteration to them. However both the draft plan and material alteration were advised in two newspapers.</p> <p>I note this submission does not relate to any of the proposed amendments on public display, therefore this submission is not admissible and cannot be considered at this stage.</p> |                                            |  |
| 11 | Stephen<br>Ward Town<br>Planning<br>Consultants<br>Ltd on behalf<br>of Escadia<br>Ltd. | <p>This submission relates specifically to the proposal to include a new zoning objective RT which has been applied to two adjacent sites in off Sean O Carroll Street.</p> <p>It details that the proposed zoning is contrary to:</p> <ul style="list-style-type: none"> <li>• Would be in direct conflict with the policy DEV 2 and objectives paragraph 7.1.3 and those contained within table 8.1 of the draft Plan the policies which aim to consolidate and strengthen the town centre.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>This is one of a four of submissions which opposes the proposed inclusion of a Land Use Zoning Category and Objective (RT) To provide for the development of a modern format supermarket of up to 2,500m<sup>2</sup> of a net retail floorspace (including food and non-food floorspace) off Sean O'Carroll Street.</p> <p>It is the stated priority and preference of the Draft Plan to direct retail development into the</p>                                                                                                                                                                           | Amendment to Draft Plan is not recommended |  |

|  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |
|--|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|  |  | <ul style="list-style-type: none"> <li>• Policies EDE 10 and EDE 13 of the County Development Plan which aim to maintain the viability and vitality of town centres and their role as primary retail core areas and to resist the provision of large scale retail developments outside town centres.</li> <li>• The Border Regional Guidelines</li> <li>• The Louth Retail Strategy</li> <li>• The Retail Guidelines for Planning Authorities (2005)</li> </ul> <p>The submission concludes that An Bord Pleanála reasons for refusing planning permission on one of these sites seven months ago cannot be overcome by zoning to which the NRA has objections, and the County Manager recommends against. Thus the proposed amendment would be contrary to the proper planning and development of Ardee as it would have an adverse impact on the town centre and undermines the policies and objectives of the new local area plan.</p> | <p>town centre in order to strengthen and preserve the town centre as the main focus for such development.</p> <p>I consider that the proposed land use zoning objective (RT) commercial retail, to allow large retail development would be contrary to objectives of the Retail Planning Guidelines for Planning Authorities (DOE) 2005, the Louth Retail Strategy 2009, the Louth County Development Plan and the aims of this plan to preserve and strengthen the town centre as the main focus for retail and commercial development and protect its vitality and viability</p> |  |
|--|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

7149 No 1

CAPPOCKSGREEN  
Faiche an Cheapógaigh

South County Council  
31 JAN 2011  
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**NOTE:**  
DO NOT SCALE FROM  
DRAWINGS. WORK  
TO FIGURED  
DIMENSIONS ONLY.  
ARCHITECT TO BE  
NOTIFIED OF ALL  
DESCREPIENCIES.

### LEGEND

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MCM

**MCROSSAN O'Rourke MANNING ARCHITECTS**

PROJECT TITLE  
ARDEE LANDS

DRAWING TITLE: SITE LOCATION PLAN

|        |             |            |      |
|--------|-------------|------------|------|
| DATE   | AUG 08      | DRAWN BY   | DMcL |
| SCALE  | 1/2500 @ A3 | REVISION   |      |
| JOB NO | 08014       | DRAWING NO | PL01 |

|         |             |
|---------|-------------|
| JOB NO. | DRAWING NO. |
| 08014   | PL01        |

MAP No 2

①  
Boundaries as proposed  
by Submission 1

CAPPOCKSGREEN  
Faiche an Cheapógaigh

MAP NUMBER 2  
SHOWING PROPOSED  
BOUNDARY CHANGES

Louth County Council  
31 JAN 2011  
Received



Boundaries as proposed by  
Submission 6

MAP NUMBER 2

