



Comhairle Contae **Lú**
Louth County Council

Chief Executive's Report on Submissions received
in respect of Proposed Variation No. 4 of the Louth
County Development Plan 2021-2027 (as varied)

20th August 2026



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1 Section One - Overview

1.1 Introduction

This Chief Executive's Report forms part of the statutory process of Proposed Variation No. 4 to the Louth County Development Plan 2021-2027 (as varied) and has been prepared under Section 58(11) of the Planning and Development Act 2024 (as amended).

The purpose of this Report is to present a summary of the submissions and observations received from members of the public, prescribed bodies and other stakeholders received during the consultation process and to provide recommendations in response to the submissions.

1.2 Summary of and Reason for Proposed Variation No. 4

The purpose of proposed Variation No. 4 to the Louth County Development Plan 2021-2027(as varied) is to align and update the Plan with recent changes in national planning policy, namely the National Planning Framework – First Revision (2025) and the associated NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025).

As required under section 58(4) of the Planning and Development Act 2024 (as amended) the reason for the Variation is as follows:

“To vary the Louth County Development Plan 2021-2027(as varied) in order to ensure consistency with the National Planning Framework - First Revision (2025) and to give effect to the Housing Growth Requirements Guidelines for Planning Authorities (2025) issued under Section 28 of the Planning and Development Act 2000 (as amended).”

The NPF Implementation: Housing Growth Requirements Guidelines introduce higher housing growth targets and a new provision allowing up to 50% additional zoned land above baseline requirements, reflecting Government recognition of the need for adequate headroom and the reality that not all zoned lands are activated within a plan period. As the existing Core Strategy contained in the Louth County Development Plan 2021-27 (as varied) was prepared under the previous 2020 Housing Supply Target Methodology, it no longer reflects national policy or updated housing demand projections. This Variation is therefore necessary to update housing targets, land-use zoning, and associated policy frameworks so that the Development Plan remains consistent with national requirements and can proactively support the timely delivery of housing.

The proposed variation includes amendments to the following elements of the County Development Plan:

- Volume 1 – Written Statement
- Volume 1A – Maps for Regional Growth Centres, Self Sustaining Growth Towns and Self-Sustaining Towns
- Volume 2- Town and village Statements, including associated Maps
- Volume 5 – Environmental Reports



The Proposed Variation is accompanied by:

- A Strategic Environmental Assessment (SEA) Environmental Report incorporating SEA Screening,
- A Natura Impact Report (NIR) incorporating an Appropriate Assessment (AA) Screening,
- A Strategic Flood Risk Assessment,
- A Settlement Capacity Audit,
- A Map booklet of all sites considered; and
- A Map booklet of proposed zoning changes

This Report is now formally submitted to the Elected Members for consideration on 20th August 2026.

It should be noted that the Chief Executive's Recommendations for amendments have been considered by the ongoing SEA and AA processes that are being undertaken alongside the preparation and making of the Variation and it has been confirmed that they would not give rise to any likely significant effect on the environment or any European Site.

1.3 How to read and identify changes

The Chief Executive's Report should be read in conjunction with all documents associated with Proposed Variation No. 4, which are available by clicking [here](#) together with the consolidated Louth County Development Plan 2021-2027 which has incorporated Variations 1, 2, and 3, which can be accessed by clicking [here](#).

In the proposed Variation Report that was placed on public display new text is in **red** and deleted text is in **blue with a strikethrough**.

In response to submissions or observations received, the Chief Executive has recommended changes to the text of the amendments proposed in the Variation. Any recommended deletions to text are shown in **red with a strikethrough**. Any recommended new text is shown in **green**.

1.4 Public Consultation

A copy of the Proposed Variation No. 4 and the accompanying Strategic Environmental Assessment (SEA) Environmental Report incorporating SEA Screening, Natura Impact Report (NIR) incorporating an Appropriate Assessment (AA) Screening, Strategic Flood Risk Assessment, Settlement Capacity Audit, Map booklet of all sites considered and Map booklet of proposed zoning changes were available for inspection from Friday 26th June 2026 until 4pm on Friday 24th July 2026. The documents in respect of this variation were available at the following locations:



Louth County Council - Customer Service Desks

- Louth County Council, Millennium Centre, Dundalk
- Louth County Council, Town Hall, Dundalk
- Louth County Council, Fair Street, Drogheda
- Louth County Council, Mid Louth Civic Services Centre, Ardee

Louth County Council – Public Libraries

- Louth Library, Dundalk
- Drogheda Library
- Ardee Library
- Dunleer Library
- Carlingford Library

The proposed Variation (No. 4) of the Louth County Development Plan 2021-2027 (as varied) was also available for inspection on the Council's [Online Consultation Portal](#).

1.5 Next Steps

It is required that the report of the Chief Executive be prepared and submitted to the Elected Members not later than 8 weeks after giving notice of the intention to make the Proposed Variation. This report was circulated to the Elected Members on the 20th August 2026.

In accordance with Section 58(12)(a) of the Planning and Development Act 2024 (as amended) the Elected Members shall consider the Proposed Variation and the report of the Chief Executive. The Elected Members are then required, in accordance with Section 58(12)(b) of the aforementioned Act, to complete their consideration of the Proposed Variation and the report of the Chief Executive within 6 weeks of receiving the Chief Executive's Report.

Following this, the Elected Members must, in accordance with Sections 58(12)(c) and 58(12)(d) of the Planning and Development Act 2024 (as amended), resolve to make the variation to the Development Plan, with or without modifications. Should any modifications constitute a material alteration to the variation, further public consultation would be required, as set out under Section 58(13) of the Planning and Development Act 2024 (as amended).

If adopted, the variation to the County Development Plan shall have effect from the day that the variation is made.



2 Section Two – Submissions

2.1 Submissions Received

One hundred and sixty-two (162) submissions were received in relation to Proposed Variation No. 4 of the Louth County Development Plan 2021-2027 (as varied). The full list of submissions received are detailed in Appendix 1 of this report.

Each submission is summarised in the following section of this Report and the Chief Executive's response and recommendation to each submission is also provided.

2.2 Submissions received from Prescribed bodies and Chief Executive's Response and Recommendations

Submission Ref. No:

LH-C208-123

Submitted By:

Office of the Planning Regulator (OPR)

Summary of Main Issues Raised:

The OPR commends the Council for its comprehensive approach in preparing Proposed Variation No. 4, which aims to align the Development Plan with national housing growth requirements. The Office makes a number of recommendations in relation to the Core Strategy and the Settlement Capacity Audit, Flood Risk Management, site-specific objectives for lands near the M1 motorway, sustainable mobility and clarity on the status of a spot objective in Collon.

Observation 1 – Consistency with the Core Strategy and Settlement Capacity Audit

In order to ensure clarity within the core strategy, the Settlement Capacity Audit and the co-ordination of housing and infrastructure, and having considered the following:

- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objectives 1 and 2 and section 2.4 to incorporate the objectives of the Housing Growth Guidelines into development plans;
- NPO 101, NPO 102 and NPO 103 of the NPF to consider the serviceability of land zoned for development;
- the Development Plans, Guidelines for Planning Authorities (2022); and
- Sustainable Residential Development Guidelines for Planning Authorities (2024),

The Planning Authority is advised to:

- (i) insert the Settlement Capacity Audit section 6.0, Table 4 into core strategy, Chapter 2 Core Strategy and Settlement Strategy, Volume 1 of the Louth County Development Plan 2021-2027 (the Development Plan);
- (ii) review the densities set out in the Settlement Capacity Audit against with the content of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (Compact Settlement Guidelines);



- (iii) update the Settlement Capacity Audit to include the potential yields for the available undeveloped residential zoned lands (h) within the current Development Plan for each settlement ensuring that the proposed densities referenced have due regard to the Compact Settlement Guidelines; and
- (iv) set out the overall quantum of undeveloped residential zoned lands (ha) within the Development Plan and the associated yield (units) into the core strategy, Chapter 2, Volume 1 of the Development Plan.

Observation 2 – Flood Risk Management

The OPR advises the Planning Authority, having regard to flood risk management and having regard to:

- NPO 77 of the NPF to integrate sustainable water management solutions and nature-based solutions;
- NPO 78 of the NPF to promote sustainable development by ensuring flooding and flood risk management inform place-making, taking account of potential impact of climate of flood and flood risk; and
- the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)

The Planning Authority is advised to:

- (i) update the proposed Variation to integrate the SFRA text in Section 2.2 relating to Ardee site 12 (proposed rezoning Ardee ARD 12) which states:

The site has lands identified as being at risk under future climate scenarios (see Appendix 1 of the SFRA Addendum). Any new uses at these at-risk lands will generally be limited to less vulnerable uses, while facilitating existing development uses that may require small scale development such as small extensions. This limitation shall take primacy over any other related land use zoning provision

- (ii) update the proposed Variation to integrate the SFRA text from section 2.2 relating to Drogheda site 10 (proposed rezoning Drogheda DRG 10) which states:

This site has lands identified as being at risk under future climate scenarios, (see Appendix I of the SFRA Addendum). Finished floor levels of new developments at these lands shall be set above the 0.1% Annual Exceedance Probability High-End Future Climate Scenario design flood level, including an appropriate freeboard allowance, having regard to the findings of site-specific flood risk assessment. Sustainable Urban Drainage Systems that seek to minimise flood risk elsewhere shall be incorporated into new developments at this site;

- (iii) amend the Strategic Flood Risk Assessment to incorporate an integrated and area-based provision of Sustainable urban Drainage Systems (SuDS) and green infrastructure related to the proposed rezoned lands where appropriate in order to avoid reliance on individual site-by-site solution; and
- (iv) include reference to SuDS and Nature Based Solutions in the description of elements to be included in the proposed Ardee and Dunleer masterplans listed in Table 13.1, chapter 13 Development Management Guidelines of the Development Plan, proposed under Amendment 50 of the proposed Variation.

Recommendation 1 – National Road Network

Having regard to the need to maintain the strategic function, operation and physical integrity of the M1 as well as protecting future residential amenity and having considered:



- the Spatial Planning and National Road Guidelines for Planning Authorities (2012);
- RPO 8.11 of the RSES to support the improvement and protection of the EU-Ten-T network and the strategic function of the Dublin to Belfast Road Network,
- Policy Objective MOV 45, Section 7.8.3, Chapter 7 of the Louth County Development Plan 2021-2027 to protect the strategic transport function of national roads including motorways; and
- Policy Objective MOV 46, Section 7.8.3, Chapter 7 of the Development Plan to support the improvement and protection of the EU Ten-T network and the strategic function of the Dublin to Belfast Road Network.

The Office recommends that the Planning Authority includes two site specific objective/spot objectives in the proposed Variation relating to Drogheda DRG 1 and 1a which address the following:

(i) any proposals in proximity to or within national roads or Transport Infrastructure Ireland (TII) managed areas shall be required to demonstrate the protection of the physical integrity and operation of the M1 and associated infrastructure (such as drainage and structures) and compliance with all relevant TII Publications (Standards and Technical) requirements; and

(ii) appropriate mitigation measures associated with the location in proximity to the M1, including management for the protection of residential amenity, must form part of any future development.

Recommendation 4 – Sustainable Mobility

Having regard to the need to integrate land use and sustainable transport planning and healthy placemaking and having considered:

- NPO 37 of the NPF to prioritise walking and cycling accessibility to proposed developments;
- RPO 9.10 of the RSES relating to the creation of healthy and active places which prioritise and promote cycling and walking;
- Climate Action and Low Carbon Development Act 2015, as amended;
- Climate Action Plan 2025;
- the National Sustainable Mobility Policy (2022); and
- section 7.6.11, chapter 7 of the Louth County Development Plan 2021-2027 relating to cycling and walking, including policy objective MOV27 relating to permeability and improved connections between existing and new neighbourhoods,

the Planning Authority is recommended to identify measures to provide permeability linkages for walking and cycling between the proposed A2 New Residential land Phase 1 at the locations listed below and local services and town centres. Where appropriate, specific local objectives should be included in the Variation in relation to the following:

- (i) Ardee ARD 5a;
- (ii) Ardee ARD 6a; and
- (iii) Ardee ARD 6b.

Other Matters

The text set out in appendix 3 of the main Variation document relating to the proposed zoning at Collon, site reference COL 2, identifies that there is a spot objective associated with this location. However, a spot objective symbol is not shown on the proposed zoning map extract, and it is noted that Amendment 52, table 13.2 of the main Variation document does not list a spot objective for this location. The Planning Authority is advised to provide clarification relating to this matter.



Chief Executive Response:

The submission from the OPR is noted and welcomed.

Observation 1 – Consistency with the Development Plan and Core Strategy

The purpose of Variation No. 4 is to amend land-use zonings across settlements in County Louth to ensure adequate land is available to accommodate the housing growth requirements set out in the revised NPF. The Settlement Capacity Audit forms part of the evidential basis underpinning the Variation and has informed the assessment of residential land requirements and development capacity across the County.

The Chief Executive is satisfied that the Settlement Capacity Audit and Core Strategy set out in the Variation documentation, when read collectively, provide a clear and robust framework for the co-ordination of housing growth, infrastructure provision and the management of residential land supply. The quantum of zoned residential lands and associated housing capacity have informed the preparation of the Variation and are set out within the supporting documentation.

Regarding the density ranges in the Settlement Capacity Audit, the Chief Executive is satisfied that these are aligned with the direction of the 2024 Guidelines particularly for a county-level Settlement Capacity Assessment where densities used are based on indicative assumptions rather than site-specific prescriptions. The Guidelines also advise that the density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment.

The Chief Executive notes the observation regarding the inclusion of potential residential yields for available undeveloped residentially zoned lands within each settlement in the Settlement Capacity Audit. While the preparation of baseline yield figures for all undeveloped residentially zoned lands could provide an additional level of detail, the Chief Executive is satisfied that the Settlement Capacity Audit, when read in conjunction with the Core Strategy and associated housing allocation framework, provides a robust demonstration of the capacity of settlements to accommodate the revised housing requirements arising from the updated National Planning Framework.

The purpose of the Settlement Capacity Audit is to demonstrate that sufficient residential development capacity exists within the settlement hierarchy to accommodate planned growth over the lifetime of the Development Plan. In this regard, the identification of the additional quantum of residentially zoned land required to facilitate the revised housing allocation provides a clear and proportionate assessment of available capacity. The Chief Executive is satisfied that the extent of residentially zoned lands identified within the Plan is sufficient to meet the projected housing growth and has regard to the Core Strategy.

Whilst the rationale for inserting the quantum of undeveloped residential lands and associated potential housing yield into the Core Strategy Table is acknowledged, the Chief Executive considers that, taking account of the fact that the quantum of undeveloped lands changes as lands are built out, it is more appropriate to detail such figures in the monitoring of the Core Strategy. In this regard the Chief Executive will commit to providing these updates on an annual basis as required in section 10.3 of the Development Plan Guidelines.

Accordingly, the Chief Executive considers that the information currently contained within the Settlement Capacity Audit and the Variation document is aligned to national and regional policy and that no further amendment is required.

Observation 2 – Flood Risk Management

It is noted that whilst the Strategic Flood Risk Assessment (SFRA) carried out as part of the Variation sets out the limitations as to future development on site 12 in Ardee and site 10 in Drogheda these details were not



incorporated into Volume 1 the Written Statement of the Development Plan. It is recommended this text is inserted into Chapter 10 of Volume 1 'Utilities' and in the interests of clarity the SFRA carried out as part of the Variation is included as an appendix in the SFRA of the County Development Plan.

The Chief Executive notes the observation to amend the SFRA to incorporate an integrated and area-based provision of SuDS and green infrastructure in respect of the proposed rezoned lands, where appropriate, in order to avoid reliance on individual site-by-site solutions. Having considered this recommendation, the Chief Executive considers that there is merit in updating the SFRA to strengthen the strategic approach to surface water management and green infrastructure provision across the proposed rezoned lands. This will help ensure that SuDS measures are planned and delivered in a coordinated manner, support climate resilience and biodiversity objectives, and reduce the potential cumulative impacts associated with a site-by-site approach.

The Chief Executive also notes the observation to include reference to SuDS and Nature Based Solutions in the description of elements to be included in the proposed Ardee and Dunleer masterplans listed in Table 13.1, Chapter 13 Development Management Guidelines of the Development Plan, proposed under Amendment 50 of the proposed Variation. However, the Chief Executive is satisfied that the Development Plan already contains a comprehensive suite of policies and objectives requiring the integration of SuDS, green infrastructure and nature-based solutions in the design and delivery of new development.

Recommendation 1: National Road Network

The proposed variation provides for a 100-metre buffer on Drogheda Site 1/1a through the rezoning of lands adjacent to the M1 Motorway to H1 Open Space. This will ensure an appropriate separation between future development and the national road network which will safeguard the strategic function and operation of the M1 and will comply with Policy Objective MOV 59 of the Louth County Development Plan 2021-2027 (as varied).

Any future development proposals will be required to comply with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), Development Plan policy objectives and TII standards and guidance. Any necessary mitigation measures arising from the proximity of the site to the national road network can be appropriately addressed as part of the development consent process. Accordingly, it is considered that the proposed rezoning and existing policy framework adequately addresses the issues raised by the OPR.

Recommendation 2 – Sustainable Mobility

The current County Development Plan contains robust policy objectives which support sustainable modes of transport, including public transport and active modes of travel (walking and cycling). It is not considered necessary to include specific local objectives relating to sites ARD 5a, 6a and 6b as the policy objectives in the Plan relating to active travel and permeability will apply and can be appropriately addressed through the development management process. It should also be noted that the layout of the development as granted to the north of site 5a provides permeability to site 5a whilst the existing layout of the lands to the east of sites 6a and 6b will ensure permeability can be provided between the existing development and the subject lands towards the town centre.

Other Matters

The Chief Executive notes the anomaly identified in relation to lands at COL 2, Collon. Following review, it is confirmed that the reference to a spot objective in Appendix 3 of the Variation document was included in error. No spot objective is intended to apply to these lands. The Variation documentation will be amended accordingly to remove the reference from Appendix 3 and ensure continuity between the written statement, Table 13.2 and the associated zoning map.

Chief Executive Recommendation:

Observation 1: No change

Observation 2:

1. Insert the following text and table into Chapter 10 'Utilities' of Volume 1 of the County Development Plan 2021-2027 (as varied):

10.3.3 Future Climate Risk Scenario Areas

Under Variation No. 4 to the County Development Plan an analysis of lands subject to a proposed zoning change was carried out to identify if they were at risk of flooding under the OPW Mid-Range and High-End Future Climate Risk Scenario Area Mapping.

Parts of two sites are identified as being at risk by the OPW Future Climate Risk Scenario Area Mapping are zoned for residential use. To reduce the flood risk associated with any development on these lands any future development shall comply with the following requirements:

Settlement and location	Requirement for any future development to comply with
Drogheda – redevelopment site opposite Bus Station 	This site has lands identified as being at risk under future climate scenarios, (see section 2.2 of the SFRA Report in Appendix 2 of the SFRA for the Louth County Development Plan 2021-2027 as varied). Finished floor levels of new developments at these lands shall be set above the 0.1% Annual Exceedance Probability High-End Future Climate Scenario design flood level, including an appropriate freeboard allowance, having regard to the findings of site-specific flood risk assessment. Sustainable Urban Drainage Systems that seek to minimise flood risk elsewhere shall be incorporated into new developments at this site.

Ardee – North-Eastern corner of Potters Field residential development



This site has lands identified as being at risk under future climate scenarios, (see section 2.2 of the SFRA Report in Appendix 2 of the SFRA for the Louth County Development Plan 2021-2027 as varied).

Any new uses at these at-risk lands will generally be limited to less vulnerable uses, while facilitating existing development uses that may require small scale development such as small extensions. This limitation shall take primacy over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan's flood risk management and drainage provisions."

2. Insert the SFRA Report for Variation No. 4 to the Louth County Development Plan as an Appendix to the original SFRA prepared for the County Development Plan and insert the following text on the cover page:

Note: A Strategic Flood Risk Assessment (SFRA) Report was carried out as part of Variation No. 4 to the Louth County Development Plan 2021-2027. This SFRA Report has been included as an appendix to the SFRA for the County Development Plan.

3. To update the SFRA by adding the following under a new subsection 2.4 "Sustainable Drainage Systems and Surface Water Guidance and Strategy" in the SFRA Addendum Report:

"As provided for by measures integrated into the existing Louth County Development Plan 2021-2027 as varied (including the measures reproduced in Table 1.1 of this report), new developments will be required to incorporate the requirement for Sustainable Urban Drainage Systems (SuDS) where appropriate. In combination, these provisions will contribute towards a sustainable drainage strategy.

It is likely that some or all of the following SuDS techniques will be applicable, including to manage surface water run-off:

- Rainwater harvesting
- Green roofs
- Infiltration systems
- Proprietary treatment systems
- Filter strips
- Filter drains
- Swales
- Bioretention systems
- Trees
- Pervious pavements
- Attenuation storage tanks
- Detention basins
- Ponds and wetlands



Each land use zoning objective allows for a range of possible uses, and the County Development Plan allows for a range of scales, heights, densities configurations/layouts and designs. The application of different SuDS techniques will be dependent on a combination of the relevant site's characteristics and the development (when known) being considered.

Because of the infinite range of land use types and associated developments and designs that could occur under the Plan as varied the guidance from this SFRA is to consider the full range of SUDs available, taking into account the recommendations and information provided above and below. On key development/opportunity sites, in particular, integrated and area-based provision of SuDS and green infrastructure may be appropriate in order to avoid reliance on individual site by site solutions.

Some sites will pose particular challenges for SuDS. The best practice manuals cited at the end of this sub-section should be considered in determining solutions.

At sites with high groundwater levels:

- Infiltration techniques may be particularly challenging and shallow infiltration basins or permeable pavements, may be most appropriate.
- Storage and conveyance systems need to be kept above maximum groundwater levels and membranes of appropriate robustness should be used to line any tanks.
- Locating storage tanks or lined sub-base systems below the maximum likely groundwater level can cause result in flotation and structural risks.

At sites that are steeply sloping:

- Effective utilisation of SuDS storage capacity should be considered, which can benefit from aligning with contours of roads and other structures, where these sites are terraced. Terraced car-parking areas can allow for storage of water through pervious pavements. Basins on terraces can provide open space. The runoff catchment on these sites can also be divided into smaller sub catchments.
- Velocities in swales and basins due to the steep slope can be managed by using check dams in swales or in storage layers, such as below permeable pavements.
- The possibility of infiltrating water resurfacing downslope or to increase pressure on downslope structures, such as walls, causing them to fail should be considered.

At sites that are very flat:

- On very flat sites, it is often not possible to construct piped drainage systems with sufficient falls to achieve minimum self-cleansing velocities. The solution can involve the use of shallow SuDS components such as swales, pervious pavements or high-capacity linear drainage channels, often dividing the site into small sub-catchments and providing local combined storage and conveyance components.
- A slight fall on any subgrade exposed to water is preferred in order to avoid ponding of water and reduction in strength in the soil due to waterlogging. If this is not possible then reduction in strength should be taken into account in the structural design of tanks or pervious pavements.
- Pumping should be a last resort and only allowable in situations where guaranteed maintenance of the pumps can be ensured.

At sites that include areas of floodplain:



- Notwithstanding that all storage volume should normally be provided within the development footprint, outside of the floodplain, SuDs on floodplains can be effective in managing routine rainfall/treatment for frequent events.
- SuDs should be selected and designed taking account of the likely high groundwater table and vulnerability to erosion during periods of high flows/water levels and SuDS should not reduce floodplain storage or conveyance.
- Conveyance routes should limit grading and the creation of surface features that could either reduce floodplain capacity or be washed out in a flood.
- Surface discharge from SuDS should be dispersed with point discharges minimised or eliminated.
- All SuDS within or crossing a floodplain should take full consideration of the likely influence of river water levels on the design performance. Combined probability assessments may be required.
- Siltation and subsequent clearance after a flood event has subsided should also be taken into account in the design.

SuDS are effective technologies, which aim to reduce flood risk, improve water quality and enhance biodiversity and amenity.

The systems should aim to mimic the natural drainage of the application site to minimise the effect of a development on flooding and pollution of existing waterways. SuDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakaways and green roofs. The integration of nature-based solutions, such as amenity areas, ecological corridors and attenuation ponds, into public and private development initiatives, is applicable within the provisions of the Settlement Plan and should be encouraged. Applications for development should take into account, as appropriate, the Department of Housing, Local Government and Heritage's (2022) "Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas - Water Sensitive Urban Design - Best Practice Interim Guidance Document" and the Local Authority Waters Programme's Guidance Document for Planners, Developers and Developer Agents 'Implementation of Urban Nature-based Solutions' (2025).

In some exceptional cases, and at the discretion of the Council, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort. Proposals for surface water attenuation systems should include maintenance proposals and procedures.

Urban developments, both within developments and within the public realm, should seek to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flood risk. Development proposals should be accompanied by a comprehensive SuDS assessment that addresses run-off rate, run-off quality and its impact on the existing habitat and water quality.

For larger sites (i.e. multiple dwellings or commercial units) master planning should ensure that existing flow routes are maintained, through the use of green infrastructure. In addition, where multiple individual proposals are being made SuDS should be integrated where appropriate and relevant.

All proposed development should consider the impact of surface water flood risks on drainage design e.g. in the form of a section within the flood risk assessment (for sites in Flood Zone A or B) or part of a surface water management plan.

Pluvial flood risk is likely to be present in local areas, however; it is not taken into account in the delineation of flood zones. Furthermore, PFRA indicative pluvial maps (2012) are not considered to be reliable for the purposes of zoning or decision-making. Particular attention should be given to development in low-lying areas which may act as natural ponds for collection of run-offs. The drainage design should ensure no increase in flood risk to the site, or the downstream catchment. Where possible, and particularly in areas of new development, floor levels should be at an appropriate height above adjacent roads and hard standing areas to reduce the consequences of any localised flooding. Where this is not possible, an alternative design appropriate to the location may be prepared.

Further to the above, proposals for development should consider the Construction Industry Research and Information Association (CIRIA) SuDS Manual 2015 and any future update of this guidance and Greater Dublin Strategic Drainage Study documents in designing SuDS solutions, including the New Development Policy, the Final Strategy Report, the Code of Practice and “Irish SuDS: guidance on applying the GSDS surface water drainage criteria”.

Recommendation 1: No change

Recommendation 2: No change

Other Matters: Delete the following text from the title block of Collon Site 2 in the Appendix 3: Proposed Variation No. 4 Map Booklet All Changes as follows: Extend the settlement boundary and rezone the lands associated with the existing dwelling to A1 Existing Residential(0.087ha). Remaining lands zoned to A2 New Residential Phase 1 (1.33ha). ~~with a Spot Objective.~~

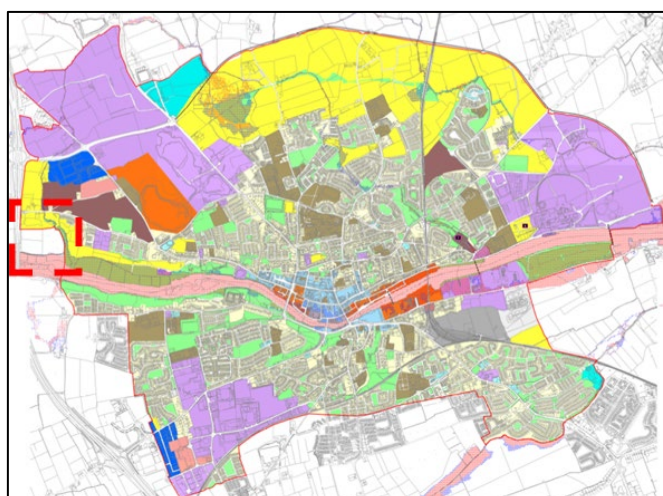
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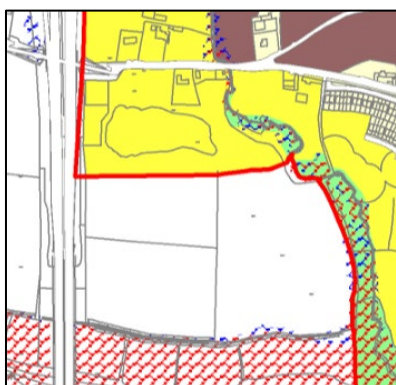
LH-C208-20

Submitted by:

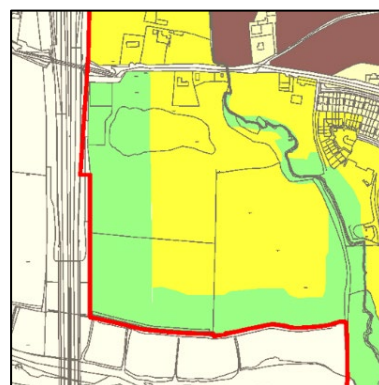
Transport Infrastructure Ireland

Maps showing the location of the subject lands:





Current zoning



Proposed Zoning (Refer to Chief Executive Recommendation)

Summary of Main Issues Raised:

Transport Infrastructure Ireland (TII) notes that the proposed rezoning at Drogheda Site 1 and 1a is located close to the M1 motorway and advises that the Council should ensure that the zoning is accompanied by site-specific requirements to protect the strategic function and physical integrity of the motorway and its associated infrastructure. TII highlights that any future development proposal will need to demonstrate compliance with the Spatial Planning and National Roads Guidelines for Planning Authorities and all relevant TII standards and technical publications.

Accordingly, TII recommends that the Variation includes site-specific objectives requiring any development in proximity to the M1 protects the operation and physical integrity of the motorway and associated infrastructure, and to incorporate appropriate mitigation measures to safeguard residential amenity and address impacts arising from the site's location adjacent to the national road network.

Chief Executive's Response:

The submission is noted. The proposed Variation provides for a 100-metre buffer on Drogheda Site 1/1a through the rezoning of lands adjacent to the M1 Motorway to H1 Open Space. This will ensure an appropriate separation between future development and the national road network which will safeguard the strategic function and operation of the M1 and will comply with Policy Objective MOV 59 of the Louth County Development Plan 2021-2027 (as varied).

Any future development proposals will be required to comply with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), Development Plan policy objectives and TII standards and guidance. Any necessary mitigation measures arising from the proximity of the site to the national road network can be appropriately addressed as part of the development consent process. Accordingly, it is considered that the proposed rezoning and existing policy framework adequately addresses the issues raised by TII.

Chief Executive's Recommendation:

No change.

Please note that an amendment to the proposed zoning to extend the H1 Open Space zoning west of Drybridge Stream is recommended by the Chief Executive under submission reference LH-C208-138 (Department of Housing, Local Government & Heritage).

Submission Ref. No.

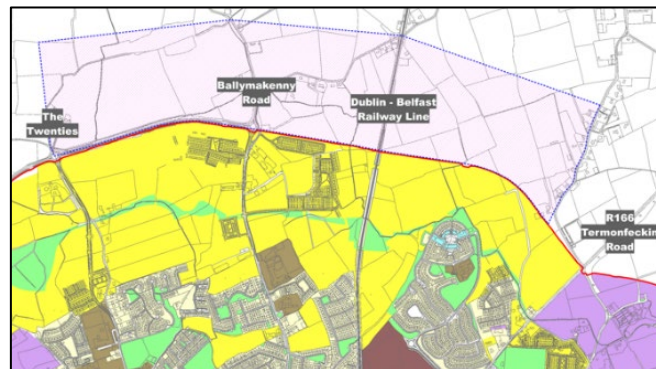
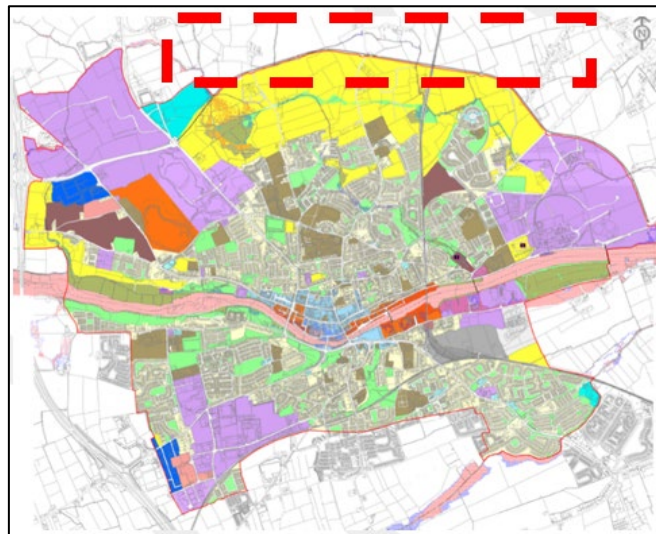
LH-C208-103

Submitted by:

National Transport Authority

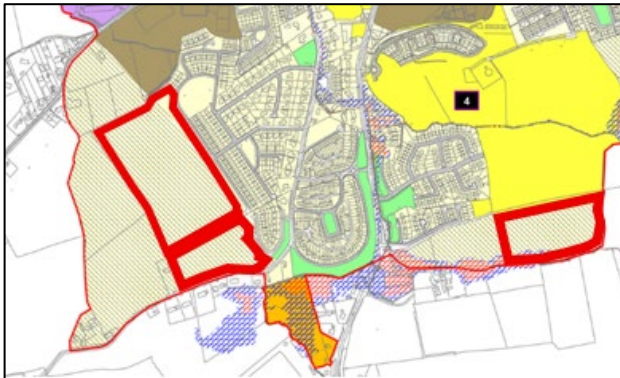
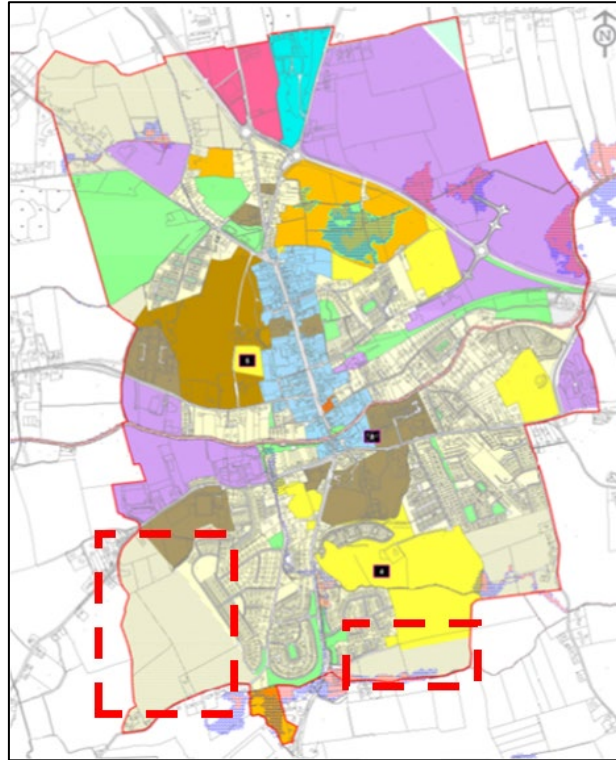
Maps showing location of subject lands:

a. Long Term Strategic Opportunity Area Drogheda



Long Term Strategic Opportunity Area – Drogheda

b. Ardee



Current zoning – subject lands outlined in red



Proposed zoning – subject lands outlined in red

Summary of Main Issues Raised:

The National Transport Authority (the 'NTA') acknowledges the receipt of notice and copy of the Proposed Variation No.4 to the Louth County Development Plan 2021-2027 to align the Plan with the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025).

Proposed Amendment No. 36

The NTA notes that identification of the Long-Term Strategic Opportunity Areas in Drogheda and Dundalk. The NTA considered it is essential the development of these is considered in the context of the wider transport needs and emerging transport networks of the adjacent respective settlements. As such the NTA recommend that appropriate reference is made to the Local Transport Plans for the towns as part of this Variation, noting that updates will be required to the plans to ensure the future transport needs of the lands are adequately considered and planned for.



Ardee

The NTA note proposed zonings at ARD 5a, ARD 6a and ARD 6b and note the location of these large and peripheral sites relative to the existing built-up-area. It is recommended that the local authority consider the application of specific local objectives that require active travel permeability between these lands and adjacent residential development, to ensure integration of the proposed lands with the wider settlement and mitigate against a reliance on the car for short trips to local services and attractions.

Chief Executive's Response:

The Chief Executive recognises the importance of ensuring the integration of land use and transportation into any future development of the Long-Term Strategic Opportunity Areas. Such an approach would ensure transportation considerations are a key element of any decisions as to how these areas could be developed. In line with national, regional, and county development plan policy, accessibility, permeability and prioritising public transport in order to encourage more sustainable modes of transport will inform any land use strategies for these locations.

As detailed in the narrative associated with the Long-Term Strategic Opportunity Areas an assessment of existing and potential future investment in infrastructure will be carried out and inform any future land use zoning decisions in these locations. This will include transport related infrastructure. Such analysis will take account of the emerging transport requirements for these locations and how this would integrate with the existing transport network.

Upon the completion of the development strategy/masterplan for these Long-Term Strategic Opportunity Areas there will be a requirement for these strategies/masterplans to be incorporated into the current/future Development Plan, at which time there will be an opportunity to incorporate the detail for these Long-Term Strategic Opportunity Areas into the Local Transport Plans.

Ardee

The current County Development Plan contains robust policy objectives which support sustainable modes of transport, including public transport and active modes of travel (walking and cycling). It is not considered necessary to include specific local objectives relating to sites ARD 5a, 6a and 6b as the policy objectives in the Plan relating to active travel and permeability will apply and can be appropriately addressed through the Development Management process. It should also be noted that the layout of the development as granted to the north of site 5a provides permeability to site 5a whilst the existing layout of the lands to the east of sites 6a and 6b will ensure permeability can be provided between the existing development and the subject lands towards the town centre.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

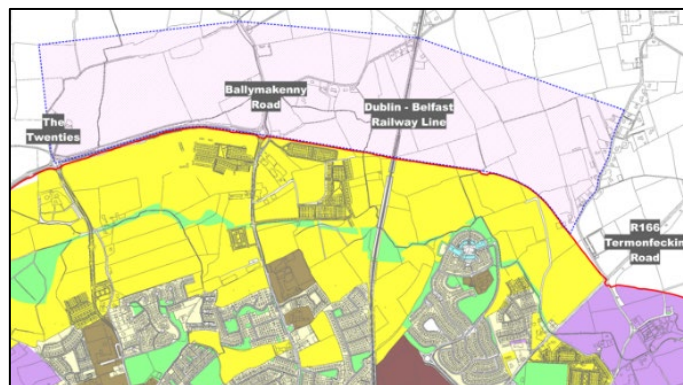
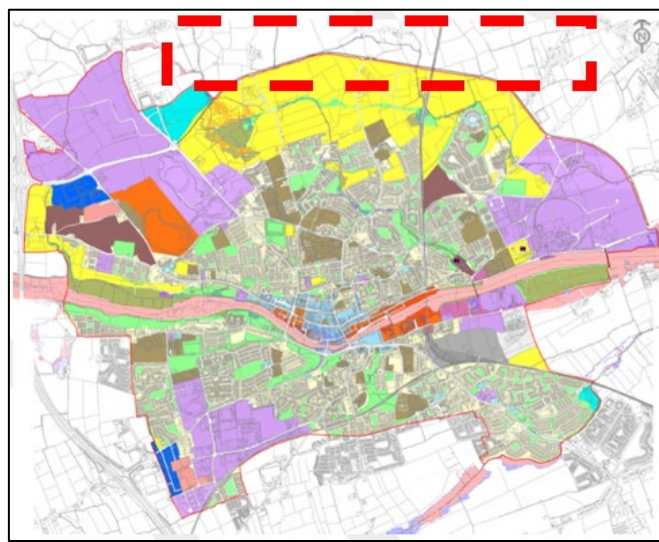
LH-C208-69

Submitted by:

Office of Public Works

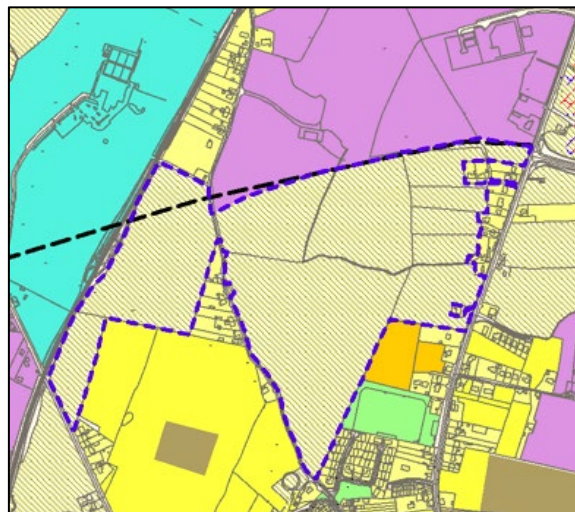
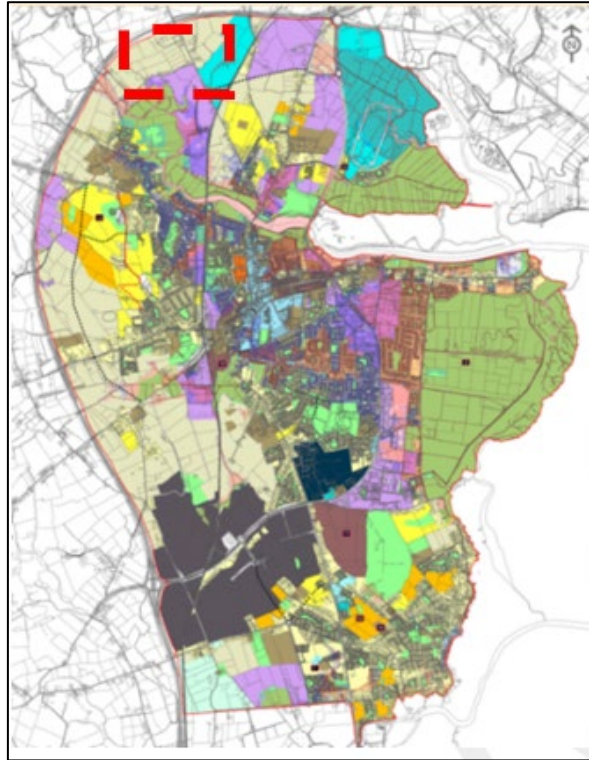
Maps showing the location of the subject lands:

a. Drogheda Long Term Strategic Opportunity Area



Long-Term Strategic Opportunity Area - Drogheda

b. Dundalk Long Term Strategic Opportunity Area



Long-Term Strategic Opportunity Area - Dundalk

Summary of Main Issues Raised:

The submission from the Office of Public Works (OPW) relates to flood risk management and climate resilience. The OPW welcomes the inclusion of flood risk and climate resilience considerations within the proposed Long Term Strategic Opportunity Areas in Drogheda and Dundalk and supports the requirement that any future assessment of these lands be informed by flood risk considerations.



The submission notes that whilst the Strategic Flood Risk Assessment (SFRA) carried out as part of the Variation sets out the limitations as to future development on site 12 in Ardee and site 10 in Drogheda these details were not incorporated into Volume 1 the Written Statement of the Development.

The submission notes that parts of the Drogheda Long Term Strategic Opportunity Area may be vulnerable to future flood risk arising from climate change and advises that any future zoning of these lands should be informed by appropriate flood risk assessment.

The submission also highlights the role of nature-based solutions and Sustainable Urban Drainage Systems in the management of surface water and flood risk. The OPW welcomes the requirement for a Surface Water Management Plan as part of the proposed Masterplan for lands in Dundalk and recommends that similar measures be considered for other Masterplan areas where appropriate.

Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges the importance of ensuring that future development is informed by the sequential approach to flood risk management and that flood risk considerations continue to form an integral part of the plan-making and development consent process.

It is noted that whilst the Strategic Flood Risk Assessment (SFRA) carried out as part of the Variation sets out the limitations as to future development on site 12 in Ardee and site 10 in Drogheda and, these details were not incorporated into Volume 1 the Written Statement of the Development. It is recommended this text is inserted into Chapter 10 of Volume 1 'Utilities' and in the interests of clarity the SFRA carried out as part of the Variation is included as an appendix in the SFRA of the County Development Plan.

The observations relating to the Long-Term Strategic Opportunity Areas and the consideration of SuDS measures within future Masterplans are noted. It is acknowledged that any future assessment of these lands will be informed by the requirements of a SFRA, the Planning System and Flood Risk Management Guidelines and relevant national policy relating to climate adaptation and flood risk management.

The Chief Executive also acknowledges the importance of nature-based solutions and Sustainable Drainage Systems in supporting sustainable development and managing surface water runoff and flood risk.

Chief Executive's Recommendation:

1. Insert the following text and table into Chapter 10 'Utilities' of Volume 1 of the County Development Plan 2021-2027 (as varied).

10.3.3 Future Climate Risk Scenario Areas

Under Variation No. 4 to the County Development Plan an analysis of lands subject to a proposed zoning change was carried out to identify if they were at risk of flooding under the OPW Mid-Range and High-End Future Climate Risk Scenario Area Mapping.

Parts of two sites are identified as being at risk by the OPW Future Climate Risk Scenario Area Mapping are zoned for residential use. To reduce the flood risk associated with any development on these lands any future development shall comply with the following requirements:

Settlement and location Drogheda – redevelopment site opposite Bus Station 	Requirement for any future development to comply with This site has lands identified as being at risk under future climate scenarios, (see section 2.2 of the SFRA Report in Appendix 2 of the SFRA for the Louth County Development Plan 2021-2027 as varied). Finished floor levels of new developments at these lands shall be set above the 0.1% Annual Exceedance Probability High-End Future Climate Scenario design flood level, including an appropriate freeboard allowance, having regard to the findings of site-specific flood risk assessment. Sustainable Urban Drainage Systems that seek to minimise flood risk elsewhere shall be incorporated into new developments at this site.
Ardee – North-Eastern corner of Potters Field residential development  Flood Modelling Extents Mid-Range 0.1% AEP High-End 0.1% AEP	This site has lands identified as being at risk under future climate scenarios, (see section 2.2 of the SFRA Report in Appendix 2 of the SFRA for the Louth County Development Plan 2021-2027 as varied). Any new uses at these at-risk lands will generally be limited to less vulnerable uses, while facilitating existing development uses that may require small scale development such as small extensions. This limitation shall take primacy over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan’s flood risk management and drainage provisions.”

2. Insert the SFRA Report for Variation No. 4 to the Louth County Development Plan as an Appendix to the original SFRA prepared for the County Development Plan and insert the following text on the cover page:

Note: A Strategic Flood Risk Assessment (SFRA) Report was carried out as part of Variation No. 4 to the Louth County Development Plan 2021-2027. This SFRA Report has been included as an appendix to the SFRA for the County Development Plan.

It should be noted that Recommendations 1 and 2 in this submission are the same as Recommendation 1 and 2 in response to the Office of the Planning Regulator (LH-C203-123)

Submission Ref. No.

LH-C208-47

Submitted by:

Uisce Éireann

Summary of Main Issues Raised:

Uisce Éireann has no significant objection to Proposed Variation No. 4 and acknowledges that it has been prepared to facilitate increased housing growth in line with national policy and the Housing Growth Requirement Guidelines.



The submission notes that the delivery of residential growth in the county will require a range of infrastructure works, including local water and wastewater network upgrades, pumping station upgrades and surface water management measures. The submission highlights the importance of co-ordinating housing growth with infrastructure delivery and notes that some upgrades may need to be developer-led.

In relation to the proposed Long-Term Strategic Opportunity Areas in Dundalk and Drogheda, Uisce Éireann notes that significant water and wastewater infrastructure investment is likely to be required before these lands can be developed and that delivery may extend beyond the lifetime of the current Development Plan.

The submission raises concerns regarding the wording of proposed Policy Objective IUXX relating to Developer-Led Infrastructure and recommends revised wording to provide greater clarity regarding the role of developer-led solutions and collaboration with Uisce Éireann and the Environmental Protection Agency.

The submission provides commentary on residential sites identified through the Settlement Capacity Audit and generally considers the proposed lands to be serviceable, subject to some upgrades to infrastructure. Attention is drawn to wastewater capacity constraints and future upgrade requirements in some settlements such as Clogherhead, Tullyallen and Collon. The submission also highlights the importance of the phasing of development particularly in Dundalk.

Chief Executive's Response:

The Chief Executive notes that Uisce Éireann has no objection to the overall approach taken in Variation No. 4 and welcomes its support for the proposed residential growth and associated re-zoning amendments. The observations regarding water services infrastructure, wastewater treatment capacity, network upgrades, development phasing and integrated surface water management are noted.

The Chief Executive also notes the comments relating to the Long-Term Strategic Opportunity Areas in Dundalk and Drogheda and the need for future infrastructure planning to support the development of these lands. The site-specific observations are welcomed and will assist in informing the future delivery and phasing of development across the county.

The Chief Executive acknowledges the concerns raised regarding the wording of proposed Policy Objective IUXX and agrees that additional clarity is required. Accordingly, it is proposed to amend Policy Objective IUXX generally in line with the wording recommended by Uisce Éireann.

Chief Executive's Recommendation:

Amend Policy Objective IUXX in the draft variation document as follows:

Delete:

~~*"To facilitate the provision of interim enabling infrastructure solutions, including temporary pumping stations and treatment facilities, to support housing development, subject to normal planning and environmental considerations, and where Louth County Council is satisfied as to the design of the system and the proposed arrangements for its operation and maintenance."*~~

Replace with:

"To support the timely delivery of housing and sustainable development, Louth County Council will consider, on a case-by-case basis, the provision of developer-led solutions that are developed in collaboration with Uisce Éireann and the Environmental Protection Agency. All proposals shall be subject to compliance with relevant planning, environmental, public health, operational and statutory requirements."

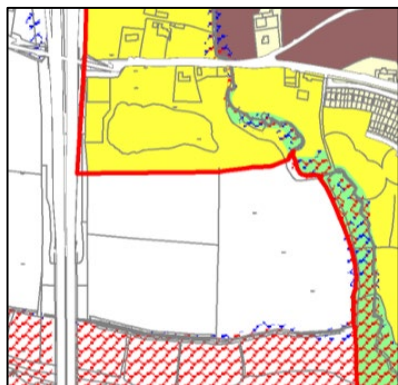
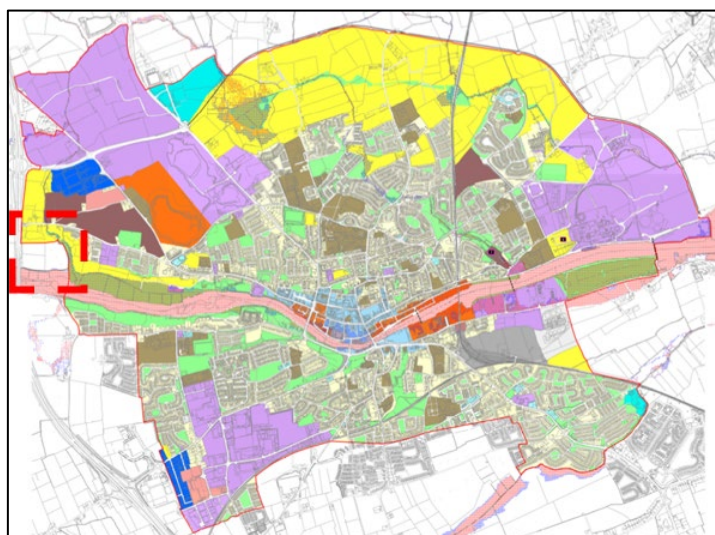
Submission Ref. No.

LH-C208-138

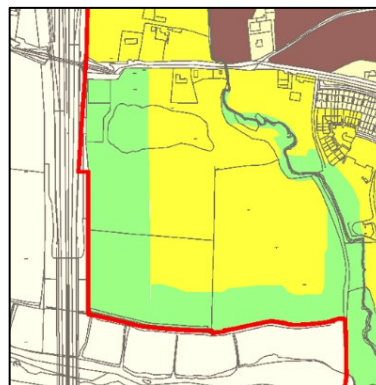
Submitted by:

Department of Housing, Local Government and
Heritage

Maps showing the location of the subject lands:



Current Zoning



Proposed Zoning

Summary of Main Issues Raised:

Department of Housing, Local Government and Heritage has reviewed Draft Variation No. 4 to the Louth County Development Plan 2021-2027, which proposes additional residential zoning to facilitate 2,856 extra housing units across the county.

Site 1, Drogheda (Drybridge, Tullyallen)

The Department of Housing, Local Government and Heritage highlights environmental concerns regarding the proposed rezoning of 5.33ha on the western edge of Drogheda in the Drybridge area in the townland of Tullyallen immediately east of the M1 and south of the (old) Slane Road. The lands are proposed to be rezoned from Rural Policy Zone 1 to A2 New Residential. The site is located adjacent to environmentally sensitive areas, and the area is bounded to the south and lies upslope of the River Boyne, and within the River Boyne and River Blackwater Special Area of Conservation (SAC). The site is bounded to the east by the Drybridge Stream running down to the



River Boyne. The adjacent SAC would consequently be vulnerable to adverse effects from pollutants carried down into it by surface water runoff from the construction and operational phases of any residential development to be carried out on the lands to be rezoned.

The Department of Housing Local Government and Heritage considers that residential development on the site could result in surface water runoff and pollution entering the SAC, potentially affecting protected habitats and species and recommends two site-specific objectives:

1. A minimum 30m riparian buffer strip should be retained along the Drybridge Stream as open space.
2. Any development should incorporate a nature-based Sustainable Drainage System (SuDS) designed in accordance with Departmental guidance on nature-based surface water management.

Wastewater and Dundalk Bay Concerns

Department of Housing, Local Government and Heritage also notes that the SEA identifies the Castletown Estuary as having a 'Bad' water quality status and is under significant pressure from wastewater sources. The Inner Dundalk Bay transitional waterbody is listed as having a 'Poor' water quality status. Both the transitional waterbodies referred to are in whole, or part, included in the Dundalk Bay Special Protection Area (SPA) and Dundalk Bay SAC, and their respective 'Bad' and 'Poor' water quality statuses could potentially lead to adverse effects on one or more of the Qualifying Interests of these European Sites.

Both waterbodies form part of the Dundalk Bay SAC and SPA and are under significant pressure from urban wastewater sources, understood to be linked to the Dundalk Wastewater Treatment Plant (WWTP).

The Department of Housing, Local Government and Heritage therefore recommends that future planning applications for rezoned lands should demonstrate that wastewater can be adequately treated and that development will not adversely affect the River Boyne and River Blackwater SAC or Dundalk Bay SAC/SPA.

Chief Executive's Response:

The submission is noted.

Wastewater and Dundalk Bay Concerns

The Chief Executive fully acknowledges that it is essential to protect the qualifying interests and conservation objectives of the Dundalk Bay SPA and SAC. Planning permission will not be granted unless a 'Consent to Discharge' licence has been granted by Uisce Éireann or appropriate developer-led solutions have been provided in collaboration with Uisce Éireann and the Environmental Protection Agency.

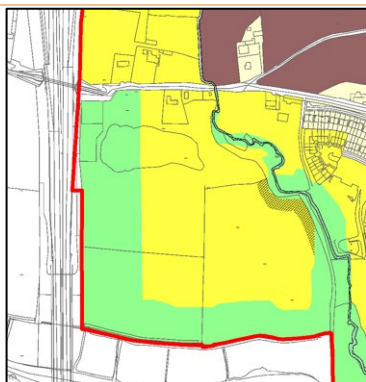
Site 1

The location of the Drybridge Stream along the eastern boundary of the site is noted. Under the proposed Variation a buffer of open space is provided along this stream that follows the Flood Zone in this location. There would be no objection to increasing this strip of open space to 30 metres in order to further contribute towards the avoidance of adverse effects on the SAC that is already provided for by the existing Plan and Proposed Variation No. 4.

The request for the surface water drainage system at Site 1 and 1a in Drogheda to be a nature-based Sustainable Drainage System is noted. This requirement could be included as a Spot Objective on these lands.

Chief Executive's Recommendation:

To update the zoning map to provide for a 30-metre-wide riparian strip, zoned H1 Open Space, along the Drybridge Stream (shaded brown on map below).



Insert the following Spot Objective into Table 13.2 in Chapter 13 of the County Development Plan relating to Site 1 and 1a in Drogheda as follows:

Spot Objective	Settlement	Location	Objective
xx	Drogheda	Lands south of the Old Slane Road	The Surface Water Drainage System of any residential development on these lands shall be a nature-based Sustainable Drainage System (SuDS) designed in accordance with the 'Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Interim Guidance Document published by the DHLGH in 2022.

Submission Ref. No.

LH-C208-141

Submitted by:

Iarnród Éireann (IE)

Summary of Main Issues Raised:

Iarnród Éireann welcomes Variation No. 4 and supports the objective of delivering housing in line with the National Planning Framework (NPF), while emphasising that future development should be aligned with Transport Oriented Development (TOD) principles and should not compromise existing or future rail infrastructure.

Observations

Amendment 36: Drogheda - Long Term Strategic Opportunity Areas

Iarnród Éireann is supportive of the proposed rail-based Transport Hub north of Drogheda. However, it notes that the proposal is not currently included in national or regional investment programmes and therefore does not form part of Iarnród Éireann's funded short-to-medium term programme.

Amendment 40 Drogheda Integrated Public Transport Hub

Iarnród Éireann strongly supports Transport Oriented Development (TOD) around transport hubs, promoting compact and sustainable growth. It is critical that development proposals must not impede the operation,



maintenance or future expansion of the rail network, including both the Northern Line and the Navan Branch Line.

Settlement Capacity Audit

Iarnród Éireann have reviewed the Settlement Capacity audit and make the following observations in relation to Dundalk Site 20 and Dunleer Site 3. For both sites it is requested that Planning Authority engage with Iarnród Éireann and CIE Property throughout planning and development stages and that any development avoids impacts on railway operations and future railway expansion. Particular regard should be given to railway bridges, underpasses, access arrangements, traffic generation and safety issues associated with development adjoining railway infrastructure.

Current Rail Development in Louth

1. Implementation of the overall DART+ Programme. Outlined provided. DART+ Coastal North serves Louth. The electrified DART network from Malahide to Drogheda was approved by An Coimisiún Pleanála in August 2025. Subject to funding being allocated it is anticipated that construction will be in the region of three years. DART+ Coastal North will significantly increase the peak hourly capacity and frequency on the Northern route between Dublin city and Malahide, Howth and Drogheda. Key infrastructure improvements are outlined and include construction of a new platform at Drogheda MacBride Station. The project will facilitate higher-density development around public transport corridors.
2. Enterprise Fleet Replacement Programme. A new fleet of tri-mode trains on the Dublin-Belfast route will improve journey times, increase service quality and reliability, enhance accessibility and support continued growth of cross-border rail services.
3. All-Island Strategic Rail Review. The submission highlights recommendations relevant to Louth, including electrification of rail services between Belfast and Drogheda, increased intercity frequencies, additional rail capacity north of Dublin and future rail infrastructure upgrades to accommodate population and economic growth.
4. FourNorth Project. Iarnród Éireann outlines the planned FourNorth programme, which would increase track capacity between Connolly and Malahide ultimately this will lead to enhanced connectivity for Louth commuters and Enterprise services.
5. Rail Freight. The submission also references Irish Rail's Rail Freight 2040 Strategy, which seeks Significant growth in rail freight services including better utilisation of existing rail freight infrastructure, including the freight route serving Tara Mines via Drogheda.

Chief Executive's Response:

The submission from Iarnród Éireann is welcomed and the ongoing commitment to enhancing rail infrastructure and public transport services within County Louth is acknowledged. The observation that the proposed rail-based Transport Hub to the north of Drogheda is not currently included within Iarnród Éireann's short to medium-term funding programme is noted. Notwithstanding this, the Chief Executive recognises that the proposal represents a long-term strategic transport objective with the potential to support the future growth and sustainable development of Drogheda and the wider region.

The support expressed by Iarnród Éireann for the principles of Transport Oriented Development (TOD) in relation to the proposed Drogheda Integrated Public Transport Hub is welcomed. The Chief Executive acknowledges the important role that public transport investment will play in facilitating compact growth and sustainable settlement patterns in accordance with national and regional planning policy.



With regard to Dundalk Site 20 and Dunleer Site 3, the concerns raised by Iarnród Éireann in respect of railway safety, operational requirements and the future expansion of the rail network are noted. The Chief Executive will continue to engage with Iarnród Éireann and relevant stakeholders in relation to any future planning applications or development proposals affecting lands in proximity to railway infrastructure. Louth County Council is committed to ensuring that future development does not adversely impact upon the safe operation, maintenance or future enhancement of the rail network and associated infrastructure.

The importance of the DART+ Coastal North project is fully acknowledged. The project will play a significant role in supporting compact growth, enhancing regional connectivity and improving sustainable transport options for communities throughout County Louth. The anticipated increase in rail capacity and service frequency will support the delivery of housing and employment growth in locations that are well served by public transport.

Louth County Council is also fully supportive of the Enterprise Fleet Replacement Programme, the recommendations of the All-Island Strategic Rail Review, the FourNorth project and the Rail Freight strategy. These initiatives represent strategically important investments in rail infrastructure which will strengthen connectivity between Louth, Dublin and Belfast, improve accessibility for residents and businesses, support economic development and reinforce the role of sustainable transport in achieving national and regional growth objectives. The contribution of these projects to the future development and competitiveness of County Louth is recognised and welcomed by the Chief Executive.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

LH-C208-78

Submitted by:

Department of Education and Youth

Summary of Main Issues Raised:

The Department of Education and Youth notes the contents of the draft Variation No. 4 to the Louth County Development Plan 2021-2027, and notes that the existing Louth County Development Plan 2021-2027 has a projected population of 149,966 within the County by 2027. The Department notes that the future projected population for Louth is 151,077. The Department notes Amendment 32 of the Draft Variation document which proposes to insert an additional table, Table XX Housing Growth Requirements to 2040 including Total Cumulative Growth and Headroom, where the table has a cumulative housing growth requirement (including headroom) of 23,478 units between 2026 and 2034.

The Department of Education and Youth notes that allowing for the Census 2022 average of 2.8 persons per household in County Louth, the proposed 23,478 units could see a population growth of over 65,738 people within Louth. When this figure is added to the Census 2022 population figure of 139,703, the projected population of County Louth could exceed 205,441. No amended population projections beyond 2027 have been provided for all individual settlements, the Department will reassess the school place requirements for County Louth when the future growth projects/housing targets for each settlement arising out of the proposed variation are identified and published. As there is very significant population growth projected, additional school provision may be required across the county. This may be in the form of extensions to existing schools or the provision of new schools. The Department's preference would be to expand existing facilities. Therefore, the Department requests that the planning authority examine the potential of protecting a land buffer around each school to



enable them to expand further if required, and reservation of additional lands for future schools may also be required.

The Department request further engagement between the Council and the Department when further information about the locations of the projected population growth becomes available in relation to the potential and significant additional school provision that may be required arising from the adoption of this variation.

The Department notes that schools are enabling infrastructure for housing and as such, schools should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and outside school hours. Further to this, other community facilities and amenities should also be positioned close to school facilities to allow for all community facilities be complimentary to each other for the benefit of the whole community. It is the Department's request that the site identified fits the criteria above and request that the Council confirm if this is the case.

All enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools, to include roads, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school, which is outside of the remit of the Department to develop or fund this infrastructure.

Dundalk

The Department notes that as per Table 2.15 the draft Variation projection for 2027 is slightly more than the current LCDP projected population for 2027, however as the projected increase is broadly in line with the LCDP projection, the submission made in December 2020 by the Department remains applicable.

Drogheda, Ardee and Dunleer

The Department notes that as per Table 2.15 the draft Variation projection for 2027 is slightly less than the current LCDP projected population for 2027, however as the projected increase is broadly in line with the LCDP projection, the submission made in December 2020 by the Department remains applicable.

Masterplan for Dundalk for lands south of Ardee Road

The Department note that this masterplan area includes a 1.5ha site for a school. The Department anticipate the need for Special Education Needs (SEN) provision at both Primary and Post Primary level, which may require schools requiring additional accommodation or space throughout the County and Country. The Department of Education and Youth works closely with the National Council for Special Education (NCSE) to plan and provide special education places and supports. The NCSE is responsible for identifying need and coordinating the establishment of special classes and special schools in consultation with education stakeholders and the HSE.

Provision for children with special educational needs (SEN) is being expanded through both special classes in mainstream schools and special schools. Post-primary schools are encouraged to provide an average of four special classes each, while medium to large primary schools are prioritised for SEN provision. Most new special classes are accommodated within existing school buildings, with extensions provided where required.

Demand for SEN places has increased significantly, leading to the establishment of 16 new special schools since 2019 and a further four planned for 2026/27. The Department continues to monitor needs nationally, including in County Louth, and will work with the NCSE and local authorities where additional accommodation or school sites are required.

Given anticipated population growth from future housing developments in County Louth, the Department supports the inclusion of explicit policies in the Development Plan to facilitate accommodation for children and young people with special educational needs. The Department also notes that unforeseen events, such as the



influx of Ukrainian refugees, can create additional pressure on school capacity and may require future reviews of school site provision.

Conclusion

The Department welcomes the continued engagement with the Council regarding the development of existing and new schools, as appropriate and emphasises the importance on the ongoing work of the Council in ensuring sufficient land is zoned for this purpose.

Chief Executive's Response:

The observations of the Department of Education and Youth are acknowledged. The Council will continue to liaise with the Department throughout the lifetime of the existing Plan in relation to any reassessment of school place requirements, as well as broader matters concerning the provision of educational infrastructure and facilities.

In relation to the Department's comments on population growth within Variation No. 4, it should be noted that, in accordance with Section 1.2 of the Section 28 Ministerial Guidelines on NPF Implementation, the estimated housing demand figure is based on population projections and the need to address unmet housing demand over the period to 2034.

The purpose of proposed Variation No. 4 is to vary the Louth County Development Plan 2021-2027 (as varied) in order to ensure consistency with the National Planning Framework – First Revision (2025) and to give effect to the Housing Growth Requirements Guidelines for Planning Authorities (2025) issued under Section 28 of the Planning and Development Act 2000 (as amended).

The current County Development Plan already contains robust policy objectives relating to the provision of Education Facilities in Chapter 4 – Social and Community. The Chief Executive acknowledges that the preference of the Department is to extend existing school sites within the County where feasible and notes that the current Plan contains the following policy objectives which relate to supporting existing schools and provision of new educational facilities, Policy Objective SC25, 26, 27, 30, 31 and 31.

In addition, the Development Management Guidelines contained in Chapter 13 of the current plan detail the assessment of educational facility proposals.

Chief Executive's Recommendation:

No change.



Submission Ref. No.	LH-C208-106
Submitted by:	Electricity Supply Board (ESB)
Summary of Main Issues Raised:	
ESB welcomes Proposed Variation No. 4 and supports its alignment with national housing and planning policy. While the Variation provides for significant residential growth and associated rezoning, ESB notes that limited reference is made to the electricity infrastructure required to support this development. ESB highlights the strategic importance of electricity infrastructure in facilitating housing growth, economic development, electrification and climate objectives. County Louth is served by key electricity infrastructure at Mullagharlin, Dundalk and Drybridge, with major upgrades planned, including a new 110kV substation at Donore Road, Drogheda, and a new 38kV substation at Ballymakenny. Additional network reinforcements will also be required to support future demand. ESB emphasises that the successful delivery of planned growth depends on the timely provision, upgrading and safeguarding of electricity infrastructure, supported by early and ongoing coordination between the Council, ESB Networks and developers. It requests that the Development Plan recognise electricity infrastructure as critical enabling infrastructure, protect sites and corridors required for future network expansion, integrate electricity requirements into development phasing, and promote early engagement on infrastructure projects to ensure efficient and coordinated delivery.	
Chief Executive's Response:	
The observations and comments made by Electricity Supply Board are noted. The Chief Executive notes that Louth County Council will continue to cooperate with all statutory and regulated bodies in the provision of power and communication facilities. The purpose of proposed Variation No. 4 is to vary the Louth County Development Plan 2021-2027 (as varied) in order to ensure consistency with the National Planning Framework – First Revision (2025) and to give effect to the Housing Growth Requirements Guidelines for Planning Authorities (2025) issued under Section 28 of the Planning and Development Act 2000 (as amended). The current County Development Plan already contains robust policy objectives relating to the provision of infrastructure and utilities within Chapter 10 of the current plan. It is not proposed to amend these provisions through the Proposed Variation, and they will continue to apply in full. As such, the Chief Executive and Council staff shall continue to maintain a proactive and collaborative partnership with the Electricity Supply Board.	
Chief Executive's Recommendation:	
No change.	



Submission Ref. No.	LH-C208-23
Submitted by:	Inland Fisheries Ireland
Summary of Main Issues Raised:	
Inland Fisheries Ireland (IFI) note its status as a statutory body whose principal function is the protection, management and conservation of the inland fisheries resource. IFI recommend that through assessments of water and wastewater infrastructure associated with the proposed zonings should be carried out in order to protect and conserve the associated aquatic habitats. IFI note that it is important to ensure that the proposal does not result in a negative impact on fisheries habitats and the ecological status of the associated waterbodies.	
Chief Executive's Response:	
The comments put forward by Inland Fisheries Ireland (IFI) are welcomed and the importance of this statutory body in its role in the protection of our rivers and aquatic environment and habitat are recognised. The need to maintain water quality is key to conservation of biodiversity and water dependant habitats and species is also acknowledged. Aquatic Habitat Protection The role of the current Development Plan, to which this proposed Variation relates in protecting the ecological status of river catchments and channels is acknowledged. The current County Development Plan already contains robust policy objectives relating to the protection of water quality and aquatic ecosystems, including the retention and enhancement of riparian corridors. It is not proposed to amend these provisions through the Proposed Variation, and they will continue to apply in full.	
Chief Executive's Recommendation:	
No change.	

Submission Ref. No.	LH-C208-33
Submitted by:	Department for Infrastructure
Summary of Main Issues Raised:	
The submission welcomes the plan-led approach adopted by the Council, together with the supporting evidence base, including the Settlement Capacity Audit, Strategic Flood Risk Assessment, Strategic Environmental Assessment and Appropriate Assessment. The submission notes the significant level of projected population and housing growth proposed for County Louth and highlights the importance of ensuring that growth is aligned with the provision of supporting infrastructure and services. It also welcomes the emphasis placed on compact growth, regeneration, infill and brownfield development, together with the identification of Long-Term Strategic Opportunity Areas in Drogheda and Dundalk. The submission encourages continued consideration of cross-border planning issues, including transport connectivity and commuting patterns, and notes the importance of the timely delivery of transport infrastructure and public transport improvements to support sustainable growth and modal shift.	



Chief Executive's Response:

The observations regarding the importance of infrastructure provision, transport connectivity and cross-border coordination are noted. These matters have informed the preparation of proposed Variation No. 4 and will continue to be considered by the Chief Executive and the Planning Team in the implementation of future reviews of the County Development Plan.

The issues raised support the overall approach contained within the proposed Variation and do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

LH-C208-35

Submitted by:

Environmental Protection Agency (EPA)

Summary of Main Issues Raised:

An overview of the role of the EPA as an environmental authority under the SEA Regulations is provided.

For land use plans at local level, a 'self-service' approach is provided via the guidance document '*SEA of Local Authority Land Use Plans- EPA Recommendations and Resources*'. It includes key environmental recommendations to consider; information on recently published relevant EPA reports; links to useful environmental resources for Local Authorities carrying out SEA of land-use plans. It is updated regularly and should be considered and, relevant recommendations incorporated. The EPA note that the proposed variation should align with higher level plans and programmes.

Content of Environmental Report

The SEA regulations set out information to be contained in the Environmental Report: Mitigation Measures, and Monitoring. In relation to monitoring the EPA note that given there is a previous iteration of the Plan in existence, that including information on outputs of the previous monitoring programme would be useful and would help inform how effective the current monitoring programme has been, and how it can be improved or further developed to cater for the new plan-period. Reference to the Environmental Monitoring set out in Table 7.1 of the NPF's SEA Statement, and this monitoring should be reflected, where relevant and appropriate.

Future Amendments to the Plan: Any future amendments should be screened for likely significant effects, using the Environmental Assessment method.

SEA Statement – 'Information on the Decision': Upon adoption of the Plan an SEA statement should be prepared and copy sent to EPA. Link to guidance provided.

Environmental Authorities: Under SEA regulations various consultations should be undertaken.

Chief Executive's Response:

The reference to the regularly updated guidance document: '*SEA of Local Authority Land Use Plans- EPA Recommendations and Resources*' is welcomed, this was utilised when carrying out the SEA for the proposed variation and the Chief Executive will have regard to same in the event that there are any material amendments.



The contents of the Environmental Report associated with the Proposed Variation No. 4 complies with the SEA Regulations. Table 7.1 of the NPF's SEA Statement was considered when drafting the proposed variation and SEA.

An SEA Statement containing the required information will be prepared at the end of the process. The guidance referred to will be taken into account in preparing the SEA Statement. The environmental authorities cited in the submission have been consulted with as part of the SEA/variation process.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

LH-C208-43

Submitted by:

Health and Safety Authority (HSA)

Summary of Main Issues Raised:

Advised to consult the HSA 'Guidance on Technical Land-Use advice' and would advise that:

Development Plans contain:

1. Planning policy in relation to major accident hazard;
2. The consultation distances and generic advice, where applicable, supplied by the Authority to Louth County Council in relation to such sites;
3. A policy on the siting of new major hazard establishments; and
4. Mention of the following notified establishments and their respective Consultation Distances:
 - BAK Bulk Services Red Barns Dunleer 300m.
 - Cooley Distillery 400m.
 - Flogas Ireland Limited (Drogheda) 600m.

Where relevant, the notified establishments should be indicated on Variation No.4 to the Louth County Development Plan 2021-2027.

Chief Executive's Response:

The comments within the HSA's submission are noted.

Regard was had to 'Guidance on Technical Land Use Advice' when considering the suitability of Sites 11 and 12 in Drogheda, for residential development.

Section 11.2 of the Louth County Development Plan 2021- 2027 pertains to 'Major Accidents – Seveso Sites' and remains applicable.

BAK Bulk Services and Cooley Distillery are not impacted by the Proposed Variation.

Chief Executive's Recommendation:

No change.



2.3 Submissions received in relation to Settlement Zoning and Chief Executive's Response and Recommendations



2.3.1 Chief Executive's Summary, Response and Recommendations on Zoning Submissions – Regional Growth Centres – Drogheda



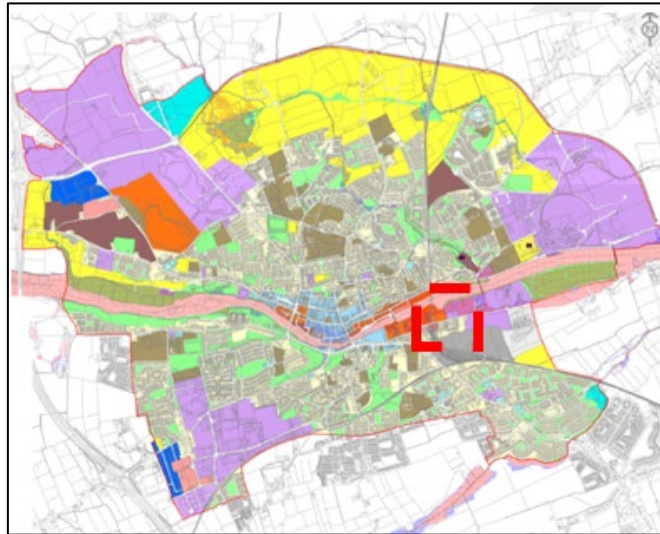
Submission Ref. No.

LH-C208-34

Submitted by:

Genesis Planning Consultants on behalf of PJ &
EJ Doherty Ltd

Maps showing the location of the subject lands:



Map included with the submission
- subject lands outlined in red



Current zoning – subject lands
outlined in red



Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 4.7ha of land at Marsh Road, Drogheda, from E1 General Employment and H1 Open Space to A2 New Residential. The submission contends that the lands represent a sequentially appropriate, brownfield infill opportunity within the settlement boundary of Drogheda and are well located in proximity to the town centre, public transport services and existing infrastructure. It is submitted that the lands are suitable for residential development, would contribute to compact growth and support the delivery of housing in accordance with the revised housing growth requirements.

The submission argues that the lands are no longer appropriate for employment uses and that residential development would represent a more sustainable use of the site having regard to its location and surrounding land uses. The submission further states that flood risk affecting the lands can be managed through engineering measures and future flood defence infrastructure and includes supporting information in relation to flood risk management. The submission also includes a Control of Major Accident Hazards (COMAH) assessment which contends that the proximity of the Flogas facility does not preclude residential development of the site.

Chief Executive's Response:

The submission is noted. Whilst the location of the lands along the River Boyne and in close proximity to the urban core of the town is acknowledged there are constraints in the locality which are inhibiting the development potential of the lands.

The subject lands were assessed as Site 12 as part of the Settlement Capacity Audit undertaken in support of Variation No. 4 and were discounted having regard to the existing zoning, flood risk and the proximity of the Flogas Upper Tier COMAH establishment.

The submission contends that the lands are more appropriately zoned for residential development having regard to their location within the settlement boundary, proximity to public transport and the availability of existing services. While these are noted, the Chief Executive is not satisfied that they outweigh the constraints affecting the site.

In relation to flooding, the Planning Authority notes the information submitted regarding flood mitigation measures and the potential integration of flood defence engineering as part of any future development proposal. However, the majority of the site is located within Flood Zone A, with a further portion affected by Flood Zone B. The Planning Authority is required to apply the sequential approach to flood risk management at the plan-making stage in accordance with the Planning System and Flood Risk Management Guidelines (2009) and cannot rely on future engineering solutions as the basis for zoning lands for highly vulnerable uses such as residential development.

The information submitted in relation to the Flogas Upper Tier COMAH establishment is also noted. However, as part of the Settlement Capacity Audit, engagement was undertaken with the Health and Safety Authority, which advised that the site is located within the inner/red Seveso consultation zone associated with the facility and that residential development would not be permitted in this location. While the submission includes a technical assessment regarding COMAH land-use planning, the Chief Executive remains satisfied that the proximity of the Upper Tier COMAH establishment represents a significant constraint in considering the suitability of the lands for residential zoning.

The submission further states that the lands are no longer appropriate for employment purposes. However, the Chief Executive remains satisfied that the retention of employment-generating lands at this location supports the delivery of a sustainable pattern of development within Drogheda. Insufficient evidence has been submitted to demonstrate that the existing E1 zoning objective should be removed.



Having regard to the constraints affecting the subject lands and the availability of alternative and more suitable lands for residential development, it is considered that the current E1 General Employment zoning on the lands should be retained.

Chief Executive's Recommendation:

No change.

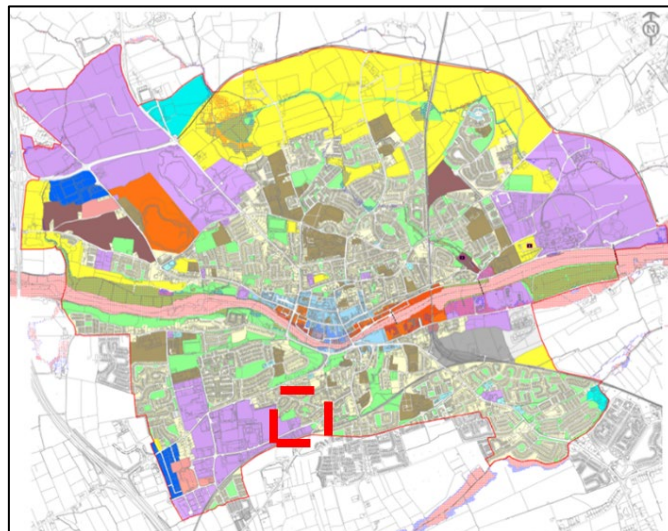
Submission Ref. No.

LH-C208-50

Submitted by:

Michael Cunningham

Maps showing the location of the subject lands:



Current zoning – subject lands outlined in red



Summary of Main Issues Raised:

The submission seeks the rezoning of lands at the former Wolfe Tones site, IDA Road, Drogheda from E1 General Employment to residential use. It is submitted that the site is located adjacent to established residential development and that the existing use of the site as a builder's yard and fuel depot is not compatible with the surrounding area. The submission requests that the lands be considered for residential development as part of the review of the County Development Plan.

Chief Executive's Response:

The submission is noted. The subject lands are currently zoned E1 General Employment. The retention of appropriately located employment lands remains an important part of the overall land-use strategy for Drogheda and supports employment generation and economic development within the settlement. The Chief Executive also notes that residential development within or adjoining established employment areas has the potential to give rise to land-use compatibility issues and may adversely affect the ongoing operation and future expansion of existing employment-generating uses in the vicinity.

Furthermore, the purpose of Variation No. 4 is to identify the most appropriate lands required to accommodate the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines. Through the Settlement Capacity Audit process, a range of sites were assessed, and as a result, sufficient lands have been identified to accommodate the revised housing allocation for Drogheda. The Chief Executive is satisfied that the sites identified through that process represent the most appropriate locations to accommodate residential development growth.

A comprehensive review of all land use zonings shall be undertaken as part of a future plan review when a wider land use strategy for Drogheda can be assessed in a cohesive manner.

The issues raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

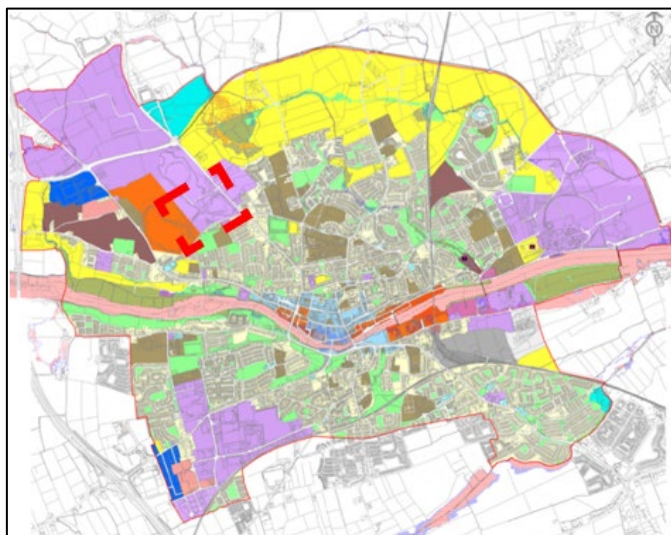
Submission Ref. No.

LH-C208-94

Submitted by:

Brady Hughes Consultants on behalf of
Apolloseven Properties One Ltd

Maps showing the location of the subject lands:



Current zoning – subject lands outlined in red.



Proposed zoning – subject lands outline in red.

Summary of Main Issues Raised:

The submission supports the proposed rezoning of Site 3 in Drogheda from E1 General Employment to A2 New Residential.

The submission notes that Site 3 was identified and assessed through the Settlement Capacity Audit and states that the proposed zoning appropriately reflects the site's relationship with the existing Seven Winds residential development. It is submitted that the lands are well served by existing infrastructure, represent a logical and sequential extension of the existing development and are capable of delivering housing in the short term.

The submission further states that the lands are available for development, are owned by a developer with a proven track record of delivery and intends to lodge a planning application for housing within 3 months of the adoption of the variation.



Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges the submitted information regarding the availability of the lands, their relationship to the existing Seven Winds development and the intention to bring the lands forward for residential development. Site 3 was identified and assessed as part of the Settlement Capacity Audit undertaken in support of Variation No. 4 and was found to be suitable having regard to its suitability, availability and deliverability.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

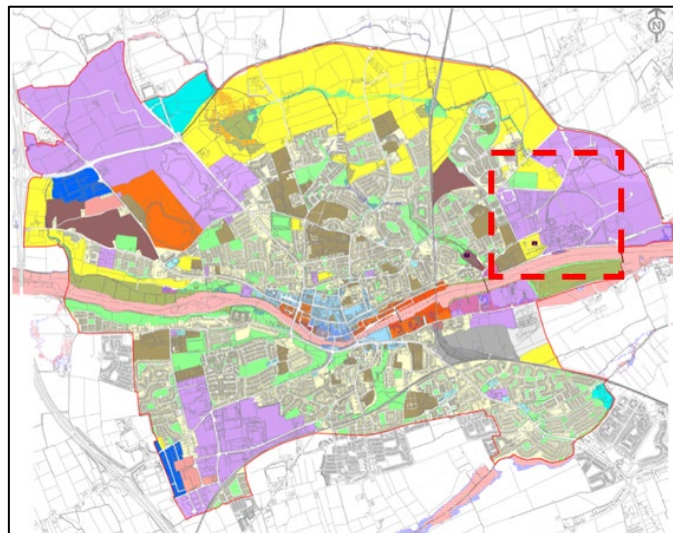
Submission Ref. No.

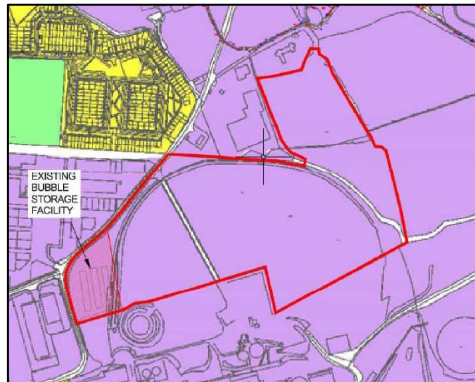
LH-C208-112

Submitted by:

Brady Hughes Consultants on behalf of Flaxton Commercial Ltd

Maps showing the location of the subject lands:





Map included with submission, indicating the location of the subject lands outlined in red.

Summary of Main Issues Raised:

The submission relates to approximately 14.2ha of land at Newtownstalaban, Drogheda, currently zoned E1 General Employment.

The submission seeks a more flexible zoning through either a C1 Mixed Use zoning or through the introduction of a site-specific objective broadening the range of permissible uses within the existing E1 zoning. It is submitted that the lands occupy a strategic location within the existing urban footprint of Drogheda and are capable of accommodating a coordinated mix of residential, employment, commercial, community and open space uses.

The submission states that the lands benefit from existing infrastructure, including road access, footpaths and public lighting, and that investment has already taken place on part of the site. It is further contended that a more flexible zoning approach would make more efficient use of existing and planned infrastructure, support housing delivery and facilitate the comprehensive development of the wider landholding.

The submission also argues that the designation of lands north of the Port Access Northern Cross Route as a Long-Term Strategic Opportunity Area should be reconsidered having regard to the availability of lands such as those at Newtownstalaban which are located closer to Drogheda town centre and within the existing urban structure.

Chief Executive's Response:

The submission is noted. The purpose of Proposed Variation No. 4 is to identify the most appropriate lands required to accommodate the revised housing growth requirements arising from the National Planning Framework First Revision (2025) and associated Section 28 Guidelines. The identification of lands proposed for inclusion in Variation No. 4 was informed by the findings of the Settlement Capacity Audit, which assessed the suitability of candidate lands having regard to a range of planning, environmental, infrastructural and servicing considerations

The location of the lands and the information submitted regarding existing infrastructure, accessibility and development potential is acknowledged. However, the existing E1 General Employment zoning continues to serve an important function within the overall land use framework for Drogheda and so an amendment is not required as part of Variation No. 4. Furthermore, sufficient and alternative, more suitable lands have been identified to accommodate the revised housing growth requirements for Drogheda having regard to suitability, availability and deliverability. As such, a review of the existing zoning framework applying to the subject lands is not considered necessary at this time.

The submission also raises concerns regarding the identification of lands north of the Port Access Northern Cross Route as a Long-Term Strategic Opportunity Area. However, these lands have been identified having regard to their strategic role in accommodating the longer-term growth of Drogheda and that the designation does not diminish the role or function of other appropriately zoned lands elsewhere within the settlement.

While the Chief Executive acknowledges that the subject lands may be capable of accommodating a broader mix of uses in the future, such matters can be more appropriately considered through a future review of the County Development Plan when the wider land use strategy for Drogheda can be assessed in a comprehensive and cohesive manner.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

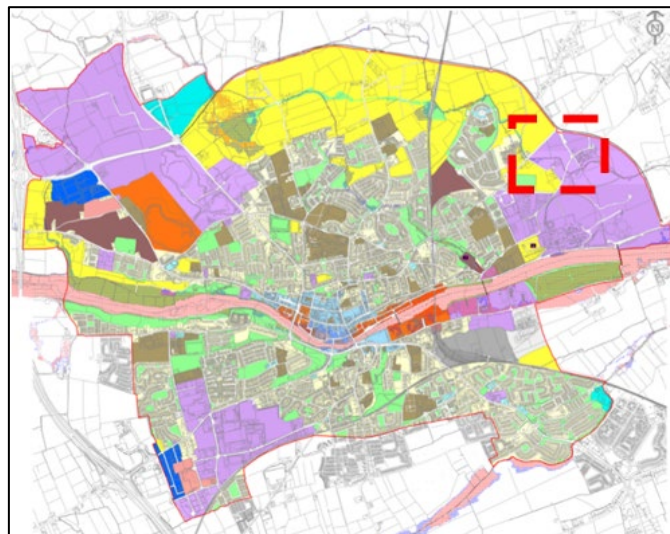
Submission Ref. No.

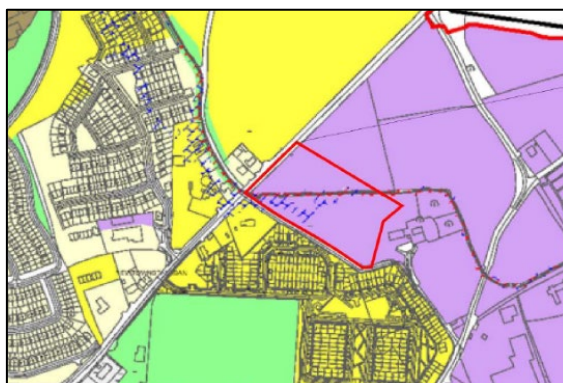
LH-C208-121

Submitted by:

Brady Hughes Consulting on behalf of Barney Flannery

Maps showing the location of the subject lands:





Map included with submission, indicating the location of the subject lands outlined in red.

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 2ha of land at Newtownstalaban, Drogheda from E1 General Employment to A2 New Residential Phase 1.

It is submitted that the lands represent an infill opportunity within the existing built-up area of Drogheda and are suitable for residential development. The submission states that the lands are available for development, are in single ownership and are capable of contributing to housing delivery during the lifetime of the current Development Plan.

The submission contends that the existing E1 General Employment zoning is no longer appropriate given the surrounding pattern of development and that residential development would represent a more compatible use of the lands. It is also argued that flood risk and environmental considerations associated with the Beaulieu Stream can be addressed through site design, public open space, a riparian corridor and Sustainable Urban Drainage Systems.

The submission further states that the lands could contribute to compact growth and provide additional flexibility within the housing land supply for Drogheda.

Chief Executive's Response:

The submission is noted. The subject lands form part of Site 6 identified through the Settlement Capacity Audit undertaken in support of Variation No. 4. The lands were assessed and were subsequently discounted.

The Chief Executive acknowledges the information submitted regarding the location of the lands, their proximity to existing residential development and the potential to accommodate residential development. It is also acknowledged that the lands represent an infill opportunity within the existing urban area. However, the Settlement Capacity Audit identified a number of constraints affecting the lands, including the presence of a stream traversing the site and associated flood risk considerations. The assessment concluded that lands in the vicinity of the stream are located within a mid to high-end future climate scenario risk area and that access to the site from Newfoundwell Road would be constrained as a result. Having regard to these considerations, it was recommended that the existing E1 General Employment zoning be retained as it represents a less vulnerable land use in this location.

The submission contends that flood risk and environmental constraints associated with the Beaulieu Stream can be addressed through site design measures, including the provision of a riparian corridor, public open space, Sustainable Urban Drainage Systems and site-specific flood risk assessment. While these measures are noted, the purpose of the Settlement Capacity Audit was to assess lands having regard to their suitability, availability

and deliverability at plan-making stage. The Chief Executive does not consider it appropriate to rely on future site-specific mitigation measures in order to establish the suitability of lands for rezoning. Having regard to the findings of the Strategic Flood Risk Assessment and the constraints identified through the Settlement Capacity Audit, the Chief Executive remains satisfied that the retention of the existing E1 zoning represents the most appropriate planning outcome.

Whilst it is acknowledged that these lands may be suitable for residential development, the purpose of Variation No. 4 was to identify lands most suitable to accommodate the revised housing growth requirements arising from the National Planning Framework First Revision (2025) and associated Section 28 Guidelines. In this regard, the Settlement Capacity Audit identified alternative, more suitable lands capable of accommodating the revised housing allocation for Drogheda. The subject lands can, however, be reconsidered in a future review of the Conty Development Plan.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

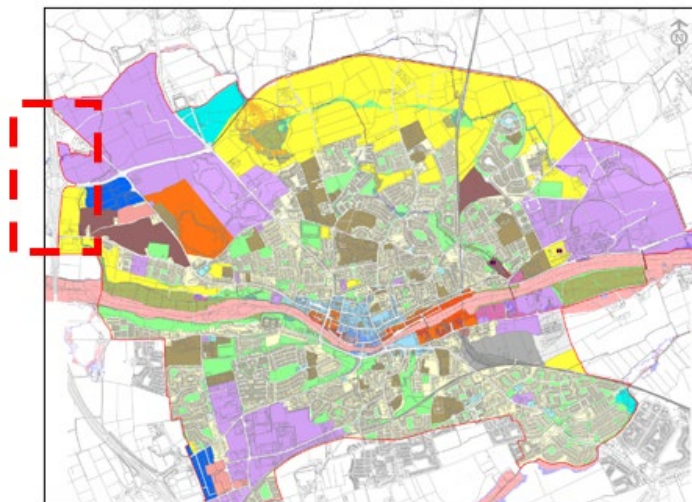
Submission Ref. No.

LH-C208-126

Submitted by:

**Hughes Planning & Development Consultants on
behalf of J. Murphy Developments Ltd. and
Ravala Ltd**

Maps showing the location of the subject lands:





Map included with submission, indicating the location of the subject lands outlined in red and located to the west of the current Drogheda Zoning and Flood Zone (Map No. 1.1)

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 17.15 ha of unzoned lands at Drybridge, Drogheda, west of M1 Junction 10, to A2 New Residential Phase 1.

1.0 Introduction

Outline provided in relation to the National Planning Framework (NPF) Implementation: Housing Growth Requirements Guidelines for Planning Authorities, reference is made to Policy and Objective 1. It is stated that the lands are strategically located, serviceable and capable of contributing to housing delivery within the lifetime of the Development Plan.

1.1 Applicant's Background

J Murphy Developments Ltd. has been building houses in Drogheda and the surrounding area since 1974, and as such is the longest-standing house builder in Drogheda.

2.0 Submission Lands

The site is strategically located, accessible and in proximity to existing residential, commercial and employment development. The lands were previously zoned for tourism and leisure use. The area has experienced significant residential and commercial expansion in recent years, with substantial development occurring between the urban edge of Drogheda and the M1 corridor. Mell and the wider Drogheda area benefit from a broad range of services and amenities. The subject lands occupy a highly accessible and strategically important location on the northwestern fringe of Drogheda. Aerial images provided showing the location of amenities in the vicinity. Surrounding lands are fully serviced (Technical note from Waterman Moylan Engineers submitted).

3.1 Alignment with Proposed Variation No.4 of the Louth County Development Plan 2021-2027.

3.1.1 Settlement Capacity Audit

The lands represent the next logical phase of development in western Drogheda and are located in proximity to recently completed/permitted residential development of 237 dwellings and to lands proposed for A2 Residential zoning under Variation No. 4. The same rationale that is applied to Site 1 in Drogheda ought to be applied to this site. Reference is made to housing policy, revised housing targets for Louth, and Drogheda's role as a Regional Growth Centre.

4.2 Louth County Development Plan 2021-2027

The Drybridge lands should be rezoned for residential development, they are adjacent to Drogheda, close to recently developed and proposed residential areas. Given the proposed extension of development plans to



February 2030, additional lands should be identified to meet demand. Developer's track record is highlighted. The lands represent a logical location for future growth and are consistent with compact and consolidated development principles.

4.1 Alignment with Compact Growth Objectives (NPO 7 & 8)

Re- zoning of the land would be in compliance with NPO 7 of the NPF, they are contiguous with the built-up area and positioned to deliver compact and sequential development.

4.2 Strategic Location within the Eastern and Midland Region

Drogheda is the optimal location within the region to accommodate targeted population growth sustainably.

4.3 Responding to Urgent Housing Needs and Policy Direction

Re-zoning of lands is in compliance with Policy and Objective 2 of the NPF, additionally the lands are shovel ready.

4.4 Public Transport Accessibility and TOD potential (NPO 10)

The subject site is ideally located to contribute to sustainable, transit linked development. Map of bus routes is provided.

4.5 Infrastructure Capacity and Readiness

The subject site is served by essential infrastructure (road, water, power, schools) or can be serviced readily. The site is also located 200m from the Drybridge ESB Substation and 500m from the Tullyallen WWTP.

4.6 Contribution to National Strategic Outcomes

The rezoning and development of the subject site would support multiple National Strategic Outcomes – NSO 1, 5 and 10.

Chief Executive's Response:

It is acknowledged that Drogheda has experienced significant population growth and a high level of house building activity, particularly to the north in recent years. In recognition of this growth, an indicative Long Term Strategic Opportunity Area has been identified to provide a clear framework for the long-term expansion of Drogheda. Subject to the completion of the required studies and the preparation of a comprehensive masterplan, these lands, together with other lands that may be identified through the process, have the potential to accommodate the future growth of the town.

Notwithstanding this, as part of Variation No. 4 a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and identify sites capable of contributing towards housing delivery. Several sites in Drogheda were assessed, including Site 18, to which this submission relates. A 'Call for Sites' submission was also received in respect of these lands (Reference No. 64).

The site was subject to a desktop assessment and site inspection. It is considered that the lands, located to the west of the M1 motorway, are detached from the existing settlement boundary of Drogheda. It was considered that the development of these lands would result in a pattern of urban sprawl and an encroachment into the surrounding countryside, which is designated as an Area of High Scenic Quality. Therefore, it is not considered appropriate to rezone these lands as part of Variation No. 4.

Chief Executive's Recommendation:

No change.

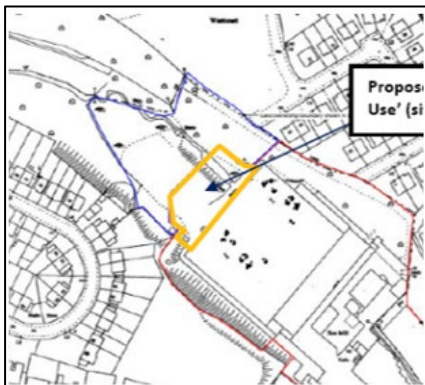
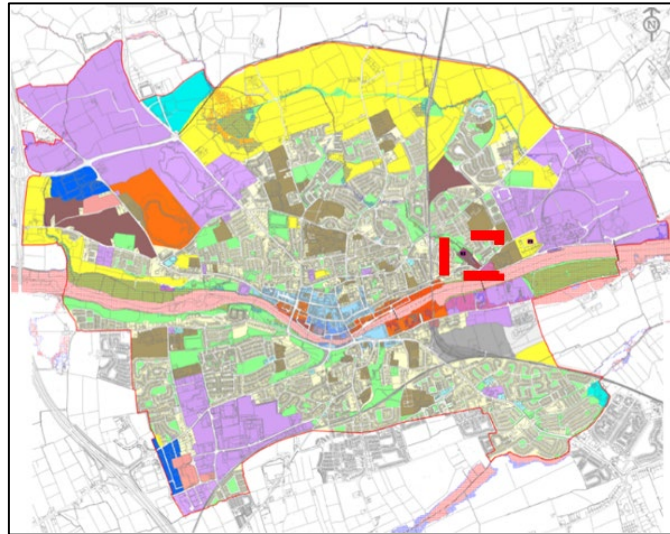
Submission Ref. No.

LH-C208-133

Submitted by:

Tom Phillips and Associates Town Planning Consultants on behalf of Silveroaks (Greenhills) Ltd.

Maps showing the location of the subject lands:



Map included within submission - subject lands outlined in yellow



Current zoning – subject lands outlined in red

Summary of Main Issues Raised:

Role of Drogheda Regional Growth Centre is recognised and is expected that Drogheda will play a pivotal role in the delivery of increased housing.

The subject site is strategically located within Drogheda and benefits from an extant 10-year permission (reference 22/88). It has the potential to deliver significant regeneration benefits to Drogheda acting as a catalysis for wider regeneration. Three specific amendments are requested:

- Remove the residential cap of 80 units contained in Spot Objective 7.
- Remove requirement linking housing delivery to prior restoration of the protected structures on the site.
- Rezone approximately 0.2 ha of adjoining H1 Open Space lands to C1 Mixed Use.



Strategic Importance of the Boyne Mill Complex is outlined: The Boyne Mill site is a serviced brownfield site within the existing built-up area of Drogheda, close to the town centre, public transport and social infrastructure, making it suitable for increased residential development. It contains several protected structures and recently developed industrial buildings.

Flood Designations: Southeast area of the site is subject to Flood Zones A & B. The 'Open Space' area is not constrained by flood risk.

Heritage Designations: 3 protected structures on site.

Access to Town Centre, Services and Social Infrastructure: Text/map provided indicating accessibility of the site.

Access to Public Transport: Location of site in relation to bus and train station and services is outlined.

Proximity to Docklands Regeneration Lands: Subject lands form part of wider area that is expected to see significant regeneration and transformation.

Extant Planning History: Overview of existing development is provided including 64 residential units.

Specific Planning Policy Context: Provisions of C1- Mixed Use and H1 Open Space zonings, details regarding Spot Objective 7 are provided.

Requested Amendment No. 1 – removal of Residential Cap from Spot Objective No. 7: The existing C1 Mixed Use zoning already ensures an appropriate mix of uses. The restriction limits the site's ability to deliver housing in line with the Sustainable and Compact Settlements Guidelines (2024). Greater flexibility would support higher residential densities and improve the viability of redevelopment

Requested Amendment No. 2- Untie Housing Delivery from Heritage Restoration: This requirement has significant viability implications. The restriction delays both housing delivery and heritage restoration. Removing the link would facilitate regeneration, housing delivery and conservation outcomes.

Requested Amendment No. 3- Rezone rear 'Open Space' lands to 'C1 Mixed use': The submission seeks the rezoning of approximately 0.2ha of adjacent land from H1 Open Space to C1 Mixed Use, arguing that: The land is within the same ownership as the wider Boyne Mill site. It has limited recreational value and is not constrained by flood risk. Rezoning would support a more coherent and viable redevelopment of the overall landholding.

Conclusion: The submission supports the housing growth objectives of Variation No. 4 but seeks planning policy changes to maximise the redevelopment potential of the Boyne Mill lands. It argues that removing the residential cap, relaxing phasing restrictions and extending the mixed-use zoning would facilitate increased housing delivery, improve viability and support regeneration while retaining the site's industrial heritage.



Chief Executive's Response:

The strategic importance of the Boyne Mill site and the wider regeneration benefits arising from the extant permission (Reg. Ref. 22/88) are acknowledged. It is considered that the requirements of Spot Objective 7 remain important in ensuring the comprehensive mixed-use development of the site and the creation of a sustainable neighbourhood. The objective also seeks to ensure that the restoration and adaptive reuse of the protected structures are delivered in tandem with the overall development of the lands, thereby securing the heritage, residential, employment and regeneration benefits associated with the site.

The provision of open space forms an important element of the overall development, contributing to the creation of a sustainable mixed-use neighbourhood and providing amenity for residents, employees and visitors to the site.

Furthermore, a review of all zoning objectives and site-specific spot objectives will be undertaken in a comprehensive and cohesive manner as part of the preparation of the next County Development Plan, and any proposed amendments can be considered as part of that statutory review process.

Chief Executive's Recommendation:

No change.



2.3.2 Chief Executive's Summary, Response and Recommendations on Zoning Submissions - Regional Growth Centres – Dundalk

Submission Theme

Residential Development at Dún Dealgan / Mount Avenue Lands

List of Submissions submitted in relation to these themes

LH-C208-2 to 6 (inclusive), 8, 10-13 (inclusive), 39-40, 51, 88, 90, 92, 113, 116-117, 122, 131, 136, 140, 142, 147, 149, 152, 155-162 (inclusive).

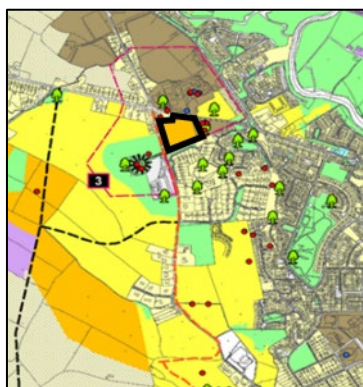
Maps showing the location of the subject lands:

Note that no maps were included in the submissions relating to the lands subject to a re-zoning request. A number of the submissions make reference to 'Map Change No.3 in Dundalk' at Mount Avenue. The Chief Executive assumes that the submission relates to the lands surrounding Castletown Motte zoned A2 New Residential Phase 1, within which Spot Objective No.3 of the County Development Plan is identified. The location of these lands is outlined in red on the Map below.

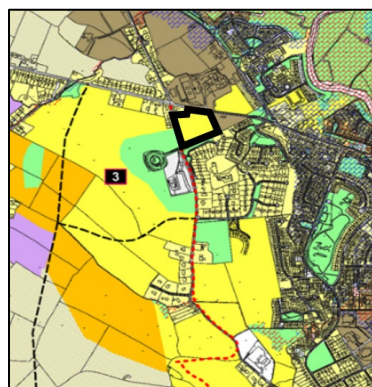


Map 1: Lands zoned A2 New Residential Phase 1 to the west of Castletown Motte

Site 11 is a parcel of land on which the phasing arrangements are proposed to be amended from A3 New Residential Phase 2 to A2 New Residential Phase 1 as part of this Variation. These lands are located on the eastern side of Mount Avenue to the north of 'The Rise' residential development and to the south of the Castletown Road and are outlined in black on the maps below. This is the only amendment proposed in the Mount Avenue area under proposed Variation no.4 and thus the Chief Executive also assumes that the submissions are referring to these lands.



Map 2: Current zoning of Site 11 outlined in black



Map 3: Proposed Zoning of Site 11 outlined in black

Summary of Main Issues Raised:

Nature of Submissions

The submissions generally object to residential development and residential zoning of lands at Mount Avenue/Castletown/Dún Dealgan and adjoining lands. A number of submissions request that these lands be rezoned from residential use to uses focused on heritage, conservation, biodiversity, education, tourism, community use, public amenity, agriculture, open space and landscape preservation/or a spot objective is provided in relation to same. Other submissions raise concerns regarding development proposals within the area and the potential impacts of future development on the wider Dún Dealgan landscape. Some submissions specifically object to a Large Residential Development adjacent to Cú Chulainn's Castle (LRD 25/60768), others raise concerns regarding the previous re-zoning process and request that the lands are re- categorised as 'Tier 2'. Several submissions also object to the proposed introduction or extension of a residential zoning under 'Map Change No. 3'.

Heritage, Cultural and Archaeological Significance

Dún Dealgan (Cú Chulainn's Castle) a national monument features prominently throughout the submissions, with many emphasising its significance as an archaeological, cultural and mythological landmark as well as its substantial tourism potential. It is contended that the value of the national monument extends beyond the castle itself to the wider landscape setting, views and associated lands, which are considered connected. The submissions generally maintain that the area forms part of a wider archaeological and cultural landscape which is closely associated with the identity and heritage of Dundalk.

A number of submissions also refer to scheduled monuments in the area and archaeological investigations carried out on lands in the vicinity, which identified a range of archaeological features. It is argued that these features form part of a broader interconnected archaeological landscape and that development could result in the loss of archaeological material and its wider context.

Landscape and Visual Impact

The submissions express concern that the open and largely undeveloped nature of the Mount Avenue/Castletown lands contributes to the setting and prominence of Dún Dealgan. Concerns are raised that residential development could alter the character of the landscape, impact views to and from the monument and diminish its visual prominence within the wider area. Several submissions seek the retention of buffers and stronger protection of key views to the monument.

Ecology, Biodiversity and Environmental Considerations

The submissions raise concerns regarding habitat loss, fragmentation, ecological connectivity and the potential impact of development on biodiversity. Reference is made to the presence of hedgerows, grasslands, mature trees, riparian habitats and wildlife corridors within the area, which support a range of species including bats, birds, badgers and other wildlife.

Drainage, Hydrology and Flood Risk

A number of submissions raise concerns regarding drainage, watercourses, groundwater resources and flood risk. Reference has been made to streams, springs and natural drainage features within the wider area, together with concerns that development may adversely affect water quality, increase surface water runoff, disrupt natural drainage systems and contribute to flooding in nearby residential areas.



Infrastructure and Sustainable Development

The submissions raise concerns regarding infrastructure capacity, including traffic generation, road safety, public transport provisions, pedestrian permeability, water and wastewater services, as well as education and community infrastructure. Concerns are also expressed regarding the absence of a comprehensive masterplan for the wider area and the potential for piecemeal development. Several submissions raise concern that residential development cannot be supported by existing infrastructure.

Public Concern

Several submissions refer to significant public concern regarding development of the lands and reference a petition containing approximately 7,000 signatures claiming a strong level of public interest in protecting the Dún Dealgan landscape and its wider setting.

Chief Executive's Response:

Request for re-zoning of lands in the Mount Avenue area

The submissions received relating to the Mount Avenue area seek a substantive amendment to the land-use zoning framework to the Mount Avenue area of Dundalk established under the County Development Plan 2021-2027 (as varied) and the Dundalk Local Area Plan 2025-2031.

The reason for proposed variation no. 4 is as follows:

“To vary the Louth County Development Plan 2021-2027 (as varied) in order to ensure consistency with the National Planning Framework – First Revision (2025) and to give effect to the Housing Growth Requirements Guidelines for Planning Authorities (2025) issued under Section 28 of the Planning and Development Act 2000 (as amended).”

Section 58(4) of the Planning and Development Act 2024 (as amended) requires a reason for making a variation to be provided.

The reason for preparing variation no.4 is a fundamental part of the consideration of submissions received during the consultation process.

The objective of Variation No.4 is to update the Core Strategy of the County Development Plan to take account of the increased housing allocation provided to Louth in the NPF Implementation: Housing Growth Requirements Guidelines (2025) and to ensure County Development Plan (as varied) provides for a sufficient quantum of zoned and serviceable land to meet these increased housing requirements and the need to significantly increase housing delivery.

The County Development Plan is also being updated to ensure it is aligned with the National Planning Framework – First Revision (2025).

Any requests in submissions received that go beyond the reason for preparing variation no.4 are considered to be outside the scope of this Variation.

The Chief Executive considers that introducing proposals to re-zone lands that have already been established through the statutory planning process would go beyond the scope of Variation No. 4 and would not contribute to the achievement of its stated reason and objective outlined above. This includes requests to re-zone lands to the west of Castletown Motte on Map 1 above that are currently zoned A2 New Residential Phase 1.

The residential zoning of these lands form part of a long-established and strategically planned expansion area for Dundalk that has been identified in successive development plans and masterplans over two decades. The present zoning status of these lands form part of the adopted statutory planning framework, having been



established in the Louth County Development Plan 2021-2027 (as varied) and subsequently in the Dundalk Local Area Plan 2025-2031. This zoning was informed by detailed consideration during the plan preparation process.

Furthermore, the Chief Executive would highlight the legislative requirement of the County Development Plan to be consistent with national and regional policy. Any re-zoning of these lands would undermine the growth strategy for both Dundalk and the Mount Avenue area of the town as identified in spatial planning policy at a local, county, and regional level, as it would remove a significant parcel of residentially zoned lands that have been identified as a key area for growth in the town. This would ultimately negatively impact on the ability of Dundalk to deliver the housing growth envisaged under the Core Strategy of the County Development Plan and would undermine the ability of the town to support population and economic growth as envisioned in its designation as a Regional Growth Centre.

The Chief Executive would therefore not support any request to re-zone lands currently zoned A2 New Residential Phase 1 to the west of Castletown Motte as identified in Map 1 above (page 55).

Comments in respect to the Large Residential Development adjacent to Cú Chulainn's Castle (LRD 25/60768)

A number of the submissions received raised issues in relation to the Large-Scale Residential Development (planning reference 25/60768) on lands adjacent to Castletown Motte. This application is currently on appeal. The consideration of planning applications is a separate statutory process to that which provides for the preparation and making of Variations to Development Plans. It would not be appropriate for the Chief Executive to comment on the details or merits of the application while the appeal is under consideration. The consideration of any issues raised in the submissions to Variation No. 4 is therefore limited to the planning and policy matters raised by the proposed variation itself, rather than the specifics of any individual planning application.

Importance and significance of Castletown Motte

The Chief Executive acknowledges the concerns raised regarding Castletown Motte and its setting. However, Variation No. 4 is specifically focused on facilitating increased housing delivery in accordance with national policy and does not provide for a comprehensive review of existing land use zonings or site-specific objectives.

Ecology

The Chief Executive also acknowledges the concerns regarding ecology and biodiversity and advises that the zoning of the lands for A2 Residential Phase 1 was subject to a robust environmental assessment process as part of both the Louth County Development Plan 2021-2027 (as varied) and the Dundalk Local Area Plan 2025-2031. These statutory plan-making processes were informed by Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), which considered the potential impacts of the zoning on ecological receptors, biodiversity and environmental sensitivities.

Identification of the lands as Tier 1 in the Infrastructure Assessment

A number of the submissions received raised concerns regarding the identification of the lands to the west of Castletown Motte (Map 1 above) as 'Tier 1' in the Infrastructure Assessment for the County Development Plan due to the extent of upgrades required to the water services infrastructure to facilitate the development of the lands.

The Chief Executive acknowledges that in the County Development Plan the lands were identified as 'Tier 1' in relation to Water and Wastewater and 'Tier 2' in relation to Roads, Footpaths, and Public Lighting.

The purpose of tiered zoning is to identify lands that are 'serviced' and 'serviceable' during the life of a Plan. An updated Settlement Capacity Audit prepared as part of the Dundalk Local Area Plan identified the lands as 'Tier 2' with regards to Water Services Infrastructure. This Report was incorporated into the County Development Plan under Variation 3 to the County Development Plan.



The Chief Executive is satisfied that a Tier 2 Zoning for these lands is appropriate as the lands can be serviced during the lifetime of the Plan.

Absence of a Masterplan

A number of submissions referred to the absence of a Masterplan for the lands identified on Map above. The Chief Executive notes that the planning framework for the lands, including Masterplan requirements, is set out in the Louth County Development Plan 2021-2027 and the Dundalk Local Area Plan 2025-2031. Matters relating to compliance with these requirements are considered through the development management process and do not form part of the purpose of Variation No. 4. The Chief Executive would advise however that a masterplan for the lands was prepared and submitted as part of the planning application on the lands.

Amendment to the residential phasing on Site 11

While the submissions do not specifically identify Site 11 as identified on Maps 2 and 3 above (page 55), a number refer generally to the 'Mount Avenue lands' and express concerns regarding residential development within the wider Mount Avenue area. Having regard to the general nature of these submissions, the Chief Executive considers it appropriate to address them insofar as they may be interpreted as relating to Site 11, which is the only site within the Mount Avenue area affected by this Variation.

Site 11 comprises an infill site located within the existing built-up area and does not constitute the zoning of new lands for residential development. The site has already been identified for residential development under both the Louth County Development Plan 2021-2027 (as varied) and the Dundalk Local Area Plan 2025-2031, where it is zoned for residential use (A3 New Residential Phase 2). The proposed Variation does not alter the residential zoning of the site but instead amends its phasing status to phase 1 to facilitate development within the lifetime of the Plan.

It is considered that the proposed amendment to the phasing of these lands from A3 New Residential Phase 2 to A2 New Residential Phase 1 as proposed under this Variation should be retained.

Conclusion

The concerns raised in the submissions have been carefully considered and are acknowledged. However, Variation No. 4 is specifically intended to support the delivery of additional housing supply in accordance with national and regional policy objectives, and to ensure that an adequate supply of residentially zoned land is available to meet identified and projected housing needs within the county.

The request to rezone the lands immediately to the west of Castletown Motte falls outside the scope and purpose of this Variation and, therefore, cannot be considered as part of this process.

Site 11 as identified on Maps 2 and 3 above (page 55), is proposed to be rezoned from A3 New Residential Phase 2 to A2 New Residential Phase 1 in order to support the implementation of the Housing Growth Requirements Guidelines and to ensure that sufficient Phase 1 residential development capacity is available in Dundalk. This amendment is required to facilitate the increased housing allocation identified under the revised Core Strategy and is supported by an assessment of the site's suitability, availability, and deliverability for residential development within the plan period.

Chief Executive's Recommendation:

No change.

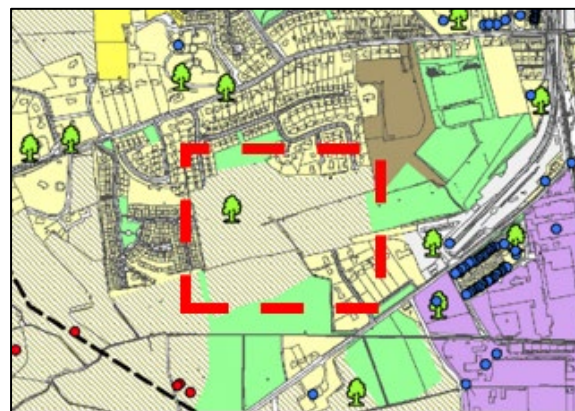
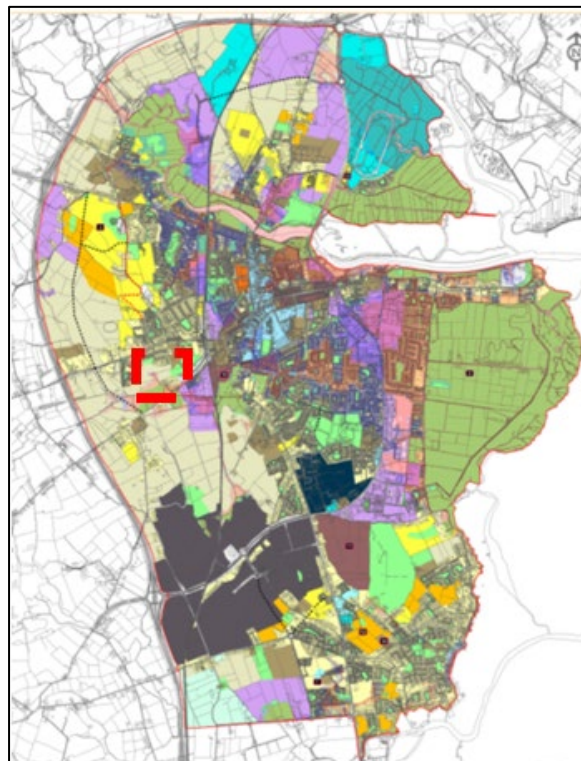
Submission Theme

**Objections to Residential
Development south of Willow Grove,
Dundalk**

List of Submissions submitted in relation to these themes

LH-C208- 15, 18-19, 21, 24-26, 30, 31, 37, 38, 45, 46, 48, 52, 53, 55, 56, 70, 71, 73, 74, 75, 77, 83, 89, 93, 97, 124, 129, 134, 139, 144, 145, 148, 150

Maps showing the location of the subject lands:



Current Zoning: Dashed red line indicates approximate location of site



Summary of Main Issues Raised:

These submissions have been grouped together as they relate to lands known locally as 'The Bog', 'The Gut' and 'Furry Glen'. The majority of submissions object to the possible rezoning of lands located to the south of Willow Grove and to the rear of Oriel Park from their existing zoning to residential. Other submissions welcome the fact that these lands have not been rezoned, while some request that the lands be rezoned as Open Space or are designated as protected area/public park. The lands in question incorporate Sites 16a, 16b and part of 38 as well as additional adjoining lands.

It is contended that the lands provide an important recreational, amenity and community resource and are regularly used by local residents for walking, running, dog walking and other informal recreational activities. The submissions highlight the value of the lands as one of the few remaining natural green spaces in this area of Dundalk and that they make an important contribution to the health and wellbeing of the local community.

Concerns are raised regarding the potential loss of wildlife and their habitats, biodiversity, ecological connectivity and green infrastructure. It is submitted that the lands support a range of flora including woodland, and wetland habitats and fauna including protected species. The area functions as an important wildlife corridor. An ecological survey of the area ought to be carried out.

The submissions also refer to the role of the lands in natural drainage, flood attenuation, climate resilience and carbon storage and question the suitability of the lands for future development having regard to surface water, soil stability, flooding and infrastructure constraints.

A number of submissions request that the lands be afforded other environmental protection measures including the introduction of a Tree Preservation Order. One submission also raises concerns relating to previous tree removal works, ownership and taking-in-charge matters and queries whether any future development of the lands would be in the public interest. Concerns are also raised regarding the potential impact of future development on the local road network and existing infrastructure in the area.

Chief Executive's Response:

The submissions are noted. The Chief Executive acknowledges the concerns raised regarding the recreational, amenity and ecological value of the lands.

The Chief Executive acknowledges that there are several site considerations affecting the lands, including the presence of Trees and Woodlands of Special Amenity Value (DLK 55), which contribute to the landscape character, visual amenity and environmental quality of the area. It was also noted that Flood Zones A and B extend through part of the land, reducing its development potential. Having regard to the aforementioned issues, it was considered that there are more suitable lands capable of contributing towards the residential growth and housing allocation requirements for Dundalk over the lifetime of the County Development Plan and therefore the existing zoning on the lands did not change as part of Variation No. 4.

The matters raised in submissions in relation to enforcement, woodland management, taking-in-charge and other legal matters including the prescriptive right of way fall are outside the scope of Variation No. 4.

The purpose of Variation No. 4 is to identify lands required to accommodate the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines. Any rezoning of the lands and the introduction of Tree Preservation Orders can be considered as part of a future County Development Plan review, where all zoning and environmental objectives can be examined in a comprehensive and cohesive manner.

Chief Executive's Recommendation:

No change.

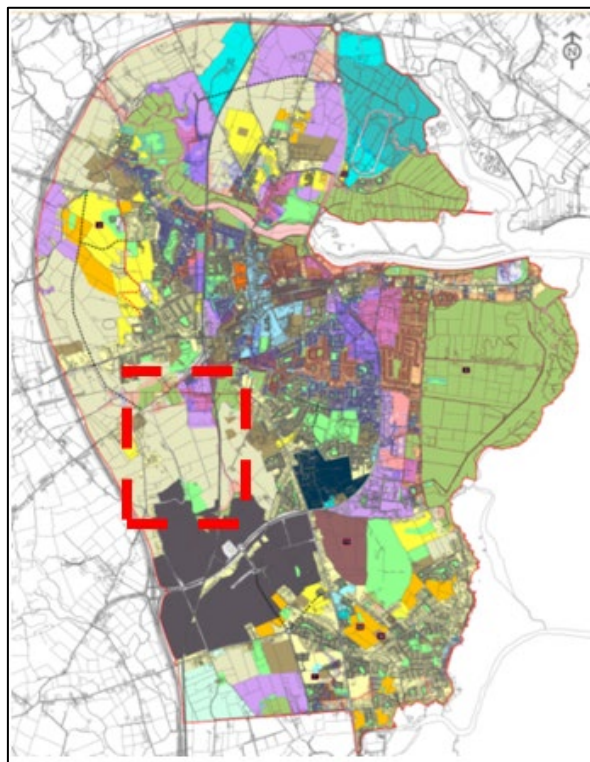
Submission Ref. No.

LH-C208-29

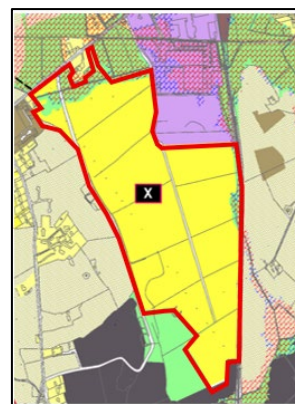
Submitted by:

Bill Baldwin

Maps showing the location of the subject lands:



Current zoning – subject
lands outlined in red



Proposed Zoning – subject
lands outlined in red



Summary of Main Issues Raised:

The submission supports the proposed rezoning of Sites 19a and 20 in Dundalk for residential development and the requirement for a masterplan. However, it raises concerns regarding the extent of the proposed H1 Open Space zoning on Site 19a, contending that the H1 zoning extends beyond the area affected by flood risk. The submission requests that the extent of the H1 Open Space zoning be reduced to align with the identified flood risk areas and that the remainder of those lands be zoned A2 New Residential Phase 1.

The submission also raises concerns regarding a footnote contained within Table 5 of Appendix 1 of the Settlement Capacity Audit which states that Site 19a will likely provide access to the wider lands at Site 20 and therefore assumes a housing density of zero for Site 19a. It is submitted that this footnote could be interpreted as predetermining future access arrangements and could give rise to uncertainty regarding the residential development potential of Site 19a. The submission requests the removal of the footnote on the basis that access arrangements should be determined through the Masterplan process and any subsequent planning application rather than through the Settlement Capacity Audit.

Chief Executive's Response:

The submission is noted. The Chief Executive welcomes the support for the proposed rezoning of Sites 19a and 20 for residential development.

The reason for the extent of the H1 Open Space zoning in site 19a is due to an exercise looking at Future Climate risk from flooding as part of the Strategic Flood Risk Assessment. The subject lands proposed to be zoned open space and outside of Flood Zones A and B were identified at flood risk by the Mid-Range and High-End future climate scenario. In order to avoid the potential for these lands to be developed for residential use it was decided to zone them as open space. Accordingly, it is considered appropriate to retain the proposed H1 Open Space zoning.

In relation to the footnote contained in Table 5 of Appendix 1 of the Settlement Capacity Audit, the Chief Executive notes the concerns raised regarding the potential interpretation that Site 19a will provide access to the wider lands at Site 20. However, the footnote was included solely for the purposes of preparing an indicative housing yield calculation for the Settlement Capacity Audit and was not intended to pre-determine future access arrangements nor does it imply that residential development cannot be accommodated on the site. This footnote will not be incorporated into the County Development Plan nor within any spot objectives on the site.

The proposed zoning objective for Site 19a remains A2 New Residential Phase 1 and the access for the wider landholding will be determined through the Masterplan process and any subsequent planning application. As set out within the proposed site-specific spot objective, the location and design of access arrangements are matters to be agreed as part of the preparation of the Masterplan and have not been predetermined through the Settlement Capacity Audit process.

The issues raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

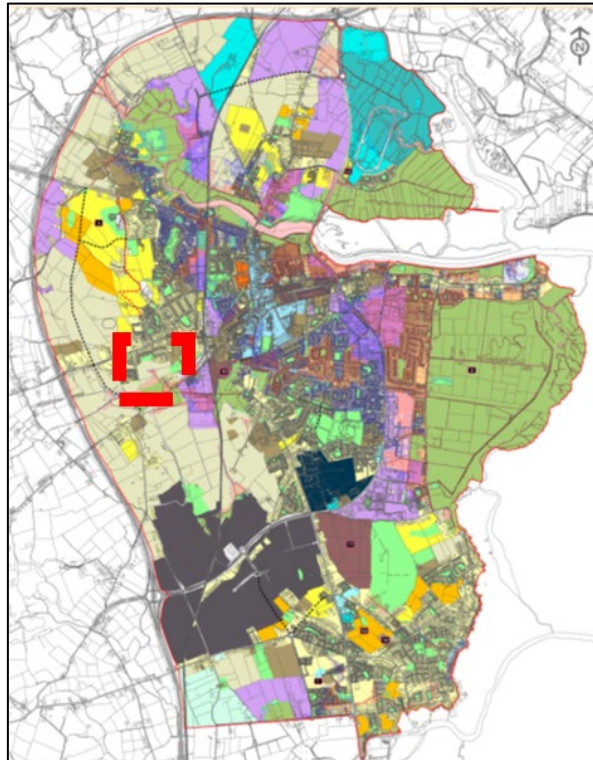
Submission Ref. No.

LH-C208-32

Submitted by:

Genesis Planning Consultants on behalf
of IJM Timber Engineering Ltd

Maps showing the location of the subject lands:



Map included with submission –
subject lands outlined in red.



Current zoning – subject lands
outlined in red.



Summary of Main Issues Raised:

The submission, made on behalf of IJM Timber Engineering Ltd. requests that lands at Mounthamilton, Dundalk, currently zoned L1 Strategic Reserve, be rezoned for residential development as part of Variation No. 4. The submission contends that the Settlement Capacity Audit incorrectly discounted the lands on the basis of topography, setting and flooding. It is submitted that the lands represent a logical and sequentially appropriate infill opportunity within the existing built-up area of Dundalk, with good accessibility to schools, services and public transport.

The submission argues that any flood risk affects only a limited portion of the site and can be addressed through site design and master planning. Reference is also made to an arboricultural assessment which concludes that the lands are capable of accommodating residential development. Furthermore, the applicant has submitted correspondence from Uisce Éireann indicating that water and wastewater connections are feasible subject to upgrades. The submission requests that the Council reconsider its assessment and rezone the lands for residential development.

Chief Executive's Response:

The submission is noted. The lands subject to this submission were assessed as part of the Settlement Capacity Audit undertaken as part of Variation No. 4 and comprise approximately 7 hectares of land located to the south of Willow Grove and north of Ardee Road, Dundalk, identified as Site 16b on the 'Map of All Sites Considered' contained within Appendix 1 of the proposed Variation No. 4 Report.

The submission contends that there is no basis for the discounting of the site due to topography/setting and flooding. However, the Chief Executive does not accept this assertion. The assessment identified the presence of Trees and Woodlands of Special Amenity Value (DLK 55), which contribute significantly to the setting, visual amenity and environmental quality of the area. The submission places significance on an arboricultural assessment prepared on behalf of the landowner. However, while the arboricultural assessment considers the potential for development from an arboricultural perspective, it does not comprise a comprehensive assessment of the designated woodland to demonstrate that it would not be adversely affected by residential development or that the designation should be disregarded to cater for residential development.

In relation to flooding, flood risk was not the sole factor informing the assessment of the lands. The Settlement Capacity Audit identified that Flood Zones A and B extend through the central portion of the site, *limiting* its development potential. These flood extents are based on the most recent flood mapping available for Dundalk (from the Hydraulic Modelling Report published as part of the Dundalk Flood Relief Scheme project) and are more extensive than the flood mapping referenced in the submission.

The Chief Executive considered the availability of alternative and more suitable lands capable of contributing towards the residential growth and housing allocation requirements for Dundalk and meeting the housing growth requirements arising from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines without the need to rezone the subject lands at this time.

Accordingly, the Chief Executive is satisfied that the retention of the lands as L1 Strategic Reserve represents the most appropriate zoning at this time. These matters can be revisited in a future review of the County Development Plan. The issues raised therefore do not give rise to any amendment to the proposed Variation.

Chief Executive's Recommendation:

No change.

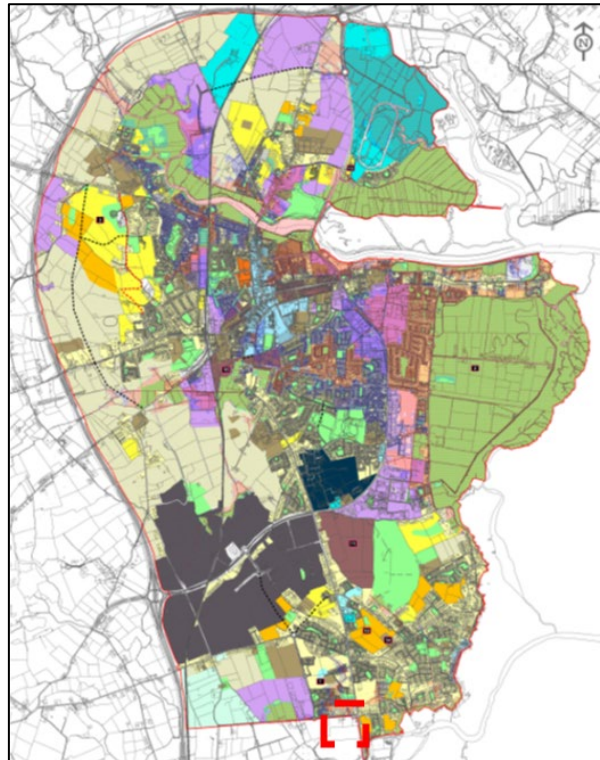
Submission Ref. No.

LH-C208-44

Submitted by:

Seamus Fallon

Maps showing the location of the subject lands:



Map included within the submission
- subject lands outlined in red



Current zoning – subject lands outlined
in red (outside of settlement boundary)



Summary of Main Issues Raised:

The submission seeks the extension of the settlement boundary and the rezoning of approximately 1.51ha of land at Clermont, Dublin Road, Dundalk for residential development. It is submitted that the lands are in single ownership, have access to existing infrastructure and are capable of accommodating approximately 35-45 dwellings.

The submission contends that the site represents a sustainable and sequential development opportunity in close proximity to existing residential development, services, employment and public transport. It is further submitted that the lands could contribute towards meeting the increased housing requirements for Dundalk and that if the lands are not proposed to be rezoned under this variation that the lands are included within the Settlement Capacity Audit and considered as part of the evidence base informing future development plan reviews.

Chief Executive's Response:

The submission is noted. The subject lands are located outside the settlement boundary of Dundalk. National and regional policy alongside the Development Plan Guidelines advocates the consolidation of urban areas and the sequential approach of development. There are more suitable lands within the settlement boundary of Dundalk available for development. The zoning of the subject lands would result in 'leapfrogging' of the more suitable lands and would give rise to urban sprawl.

Additionally, when carrying out the Settlement Capacity Audit consideration was given to the constraints at the Blackrock Wastewater Treatment Plant and the timeframe for the upgrade works being completed. Taking account of these constraints and the fact that it is likely to be beyond the lifetime of the current Development Plan before these works are completed, it was decided not to bring any additional lands in the Blackrock and Haynestown area forward for residential development.

Chief Executive's Recommendation:

No change.

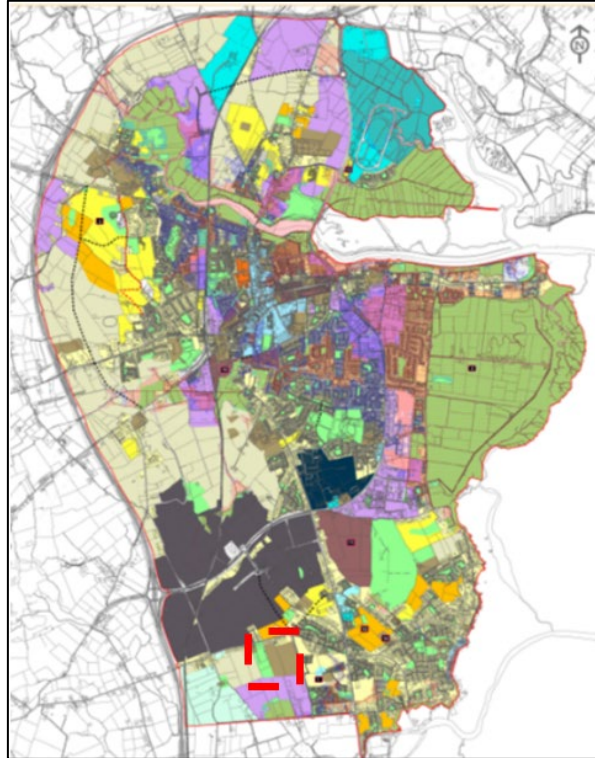
Submission Ref. No.

LH-C208-66

Submitted by:

Dermot Breen

Maps showing the location of the subject lands:



Map included within submission -
subject lands outlined in red



Current zoning - subject lands
outlined in red

Summary of Main Issues Raised:

The submission seeks the rezoning of lands at Haynestown, Dundalk from G1 Community Facilities and H1 Open Space to A2 New Residential Phase 1. It is submitted that the lands represent a suitable residential development opportunity, are well located in proximity to employment, services, schools, public transport and existing water and wastewater infrastructure and are capable of contributing towards the future growth of Dundalk.



The submission contends that the proposed residential zoning strategy for Dundalk relies on a limited number of sites, particularly Site 20, which is identified as accommodating a significant proportion of the additional residential lands proposed under Variation No. 4. It is argued that additional residential lands should be identified to provide greater flexibility, choice and certainty of delivery should any individual site fail to come forward as anticipated.

The submission further contends that the extent of G1 Community Facilities zoning is greater than required and that the H1 Open Space zoning affecting part of the lands is not justified. It is submitted that the lands are available for development and should be rezoned for residential use as part of Proposed Variation No. 4.

Chief Executive's Response:

The submission is noted. The submission contends that the proposed residential growth strategy for Dundalk relies excessively on Site 20 and that additional residential lands should be identified to provide greater flexibility should that site not come forward for development. The Chief Executive acknowledges this concern and has considered it in the preparation of the Settlement Capacity Audit. Site 20 was identified through the Settlement Capacity Audit as the most appropriate location to accommodate a substantial proportion of the revised housing growth requirements for Dundalk arising from the National Planning Framework - First Revision (2025) and associated Section 28 Guidelines having regard to its scale, strategic location, accessibility, serviceability and deliverability.

When carrying out the Settlement Capacity Audit consideration was given to the constraints at the Blackrock Wastewater Treatment Plant and the timeframe for the upgrade works being completed. Taking account of these constraints and the fact that it is likely to be beyond the lifetime of the current Development Plan before these works are completed, it was decided not to bring any additional lands in the Blackrock and Haynestown area forward for residential development.

The Chief Executive further notes the revised housing growth requirement for Dundalk necessitates the identification of lands capable of accommodating development at scale. Having regard to the findings of the Settlement Capacity Audit and the availability of alternative residentially zoned and serviced lands within the settlement, the Chief Executive is satisfied that the proposed zoning framework provides an appropriate balance between strategic growth and flexibility in housing delivery.

The submission further contends that the extent of G1 Community Facilities zoning in the area is greater than is required. The Chief Executive does not accept this contention. The purpose of the G1 Community Facilities zoning is to provide for and safeguard lands capable of accommodating a broad range of existing and future educational, community, recreational, social, cultural and institutional uses. The absence of an immediate proposal for the lands does not demonstrate that they are surplus to requirements, nor does it justify the removal of the zoning on the site.

The submission also states that the H1 Open Space zoning affecting part of the lands is inappropriate on the basis that the lands are not publicly accessible and are not identified as part of any existing or proposed public open space project. However, H1 Open Space zoning performs a broader role, including the protection of landscape, green infrastructure and the maintenance of separation between land uses. The fact that lands are privately owned or not currently developed as formal public open space does not render the zoning inappropriate.

The matters raised therefore do not give rise to any amendment to Proposed Variation No. 4.

Chief Executive's Recommendation:

No change.

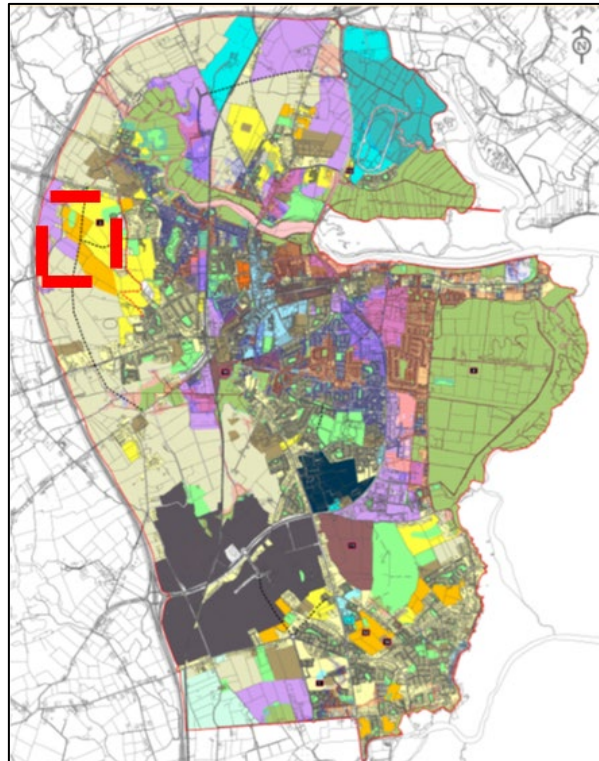
Submission Ref. No.

LH-C208-80

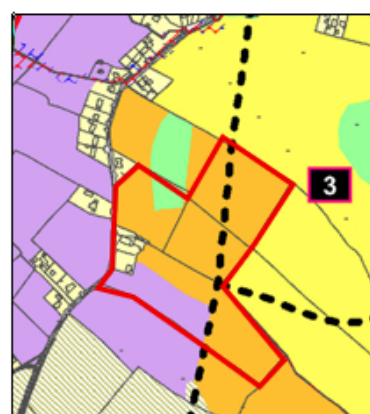
Submitted by:

MKO Planning and Environmental Consultants on
behalf of Philomena Kirk

Maps showing the location of the subject lands:



Map included with submission -
subject lands outlined in red



Current zoning - subject lands
outlined in red



Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 11.33ha of land at Greyacre Road, Dundalk from A3 New Residential Phase 2 and E1 General Employment to A2 New Residential Phase 1. Two options are proposed, rezoning of the existing A3 lands only or the rezoning of both the A3 and E1 lands to A2 New Residential Phase 1.

It is submitted that the lands are located in a sustainable location adjoining the Mount Avenue Key Development Area. The submission states that the lands could contribute towards meeting the revised housing allocation for Dundalk and support compact growth.

The submission further states that the lands are capable of being serviced and will benefit from existing and proposed infrastructure identified in the County Development Plan and infrastructure associated with the permitted Mount Avenue LRD development.

It is also submitted that the lands are well served by existing social and community facilities and will benefit from the neighbourhood facilities, services and infrastructure proposed as part of the Mount Avenue LRD development. The submission further argues that the existing E1 General Employment zoning is no longer required and that the lands would be more appropriately used for residential development.

Chief Executive's Response:

The submission is noted. The subject lands form part of the wider lands assessed as Site 12a through the Settlement Capacity Audit undertaken in support of Variation No. 4 (Call for Sites reference No. 75). The Chief Executive acknowledges the location of the lands adjacent to the Mount Avenue area and the information submitted regarding accessibility, infrastructure and proximity to existing and proposed community facilities.

In undertaking the Settlement Capacity Audit, consideration was given to the access to the lands, that would require the delivery of the link roads through the adjacent residentially zoned lands that subject to a current application for a Large-Scale Residential Development, which is currently on appeal. Taking account of the lead in time for the delivery of this access road in combination with the fact that the focus of the Variation is on lands that are readily available it was decided not to bring these lands forward at this time.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

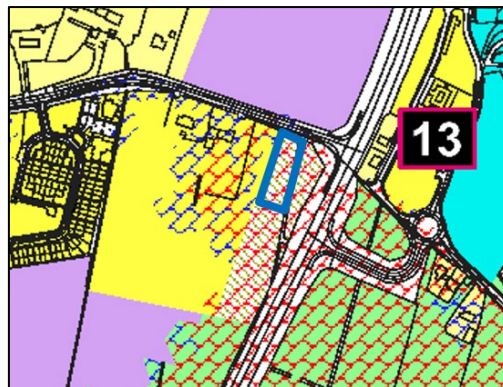
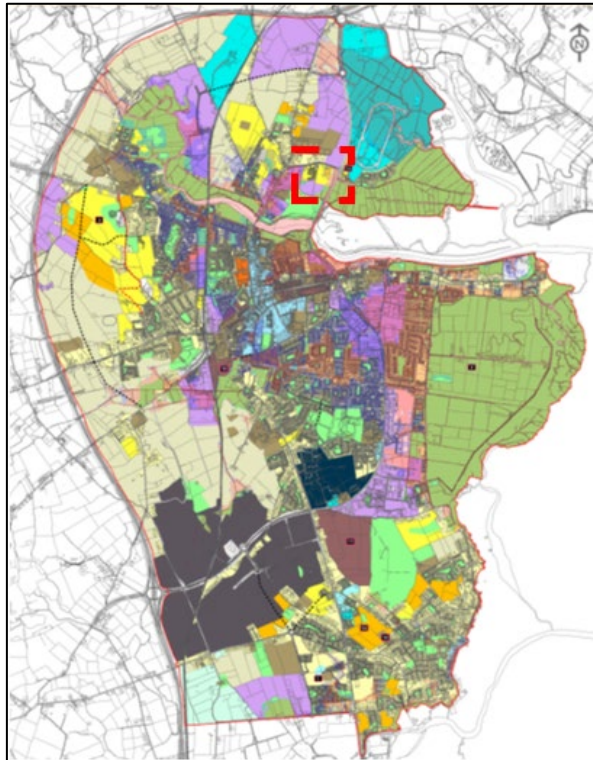
Submission Ref. No.

LH-C208-87

Submitted by:

Lisa O'Hagan

Maps showing location of subject lands:



Current zoning - subject lands outlined in blue

Summary of Main Issues Raised:

The submission requests that a small portion of family-owned lands at Racecourse Road, Dundalk, County Louth be rezoned from L1 Strategic Reserve to A2 New Residential – Phase 1.

The purpose of this request is to facilitate the construction of one family home that would enable the submitter to live beside their parents and provide them with care and support in old age.



The submission notes that zoning submissions must be based on the principles of proper planning and sustainable development rather than personal circumstances alone, however their situation demonstrates a genuine local housing need that can be accommodated in a sustainable manner. The proposed rezoning is a logical extension of the existing residential area and makes use of existing infrastructure and services and would contribute positively to the planned growth of Dundalk.

The lands were previously recognised as suitable for residential development and were zoned as Residential 1 in the Dundalk and Environs Development Plan 2009-2015.

The rezoning of lands from Strategic Reserve to Residential Phase 1 would restore a residential zoning which is consistent with the site's established physical characteristics and planning context.

The land is located within the existing urban area of Dundalk, adjoining established residential development, and existing services and road network with no significant extensions or upgrades required.

The submission seeks the rezoning of a small portion of family-owned lands at Racecourse Road from Strategic Reserve to Residential Phase 1 to facilitate a family dwelling. The lands are serviced, located within the urban area, adjoin existing and proposed residential development, and are not constrained by flood risk. The applicant contends that the proposal would integrate with planned growth, complete the existing frontage along Racecourse Road, and would not prejudice the future development or access arrangements of adjoining residentially zoned lands.

The submission also highlights the site's proximity to schools, shops, community facilities and services, making it a sustainable location for residential development. A key justification is the applicant's need to live close to and support ageing parents. It is argued that the proposal represents a modest, non-speculative development that would make efficient use of serviced lands while contributing to the sustainable and balanced growth of Dundalk.

Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges that the subject lands are an infill opportunity within the settlement boundary of Dundalk and that they are situated in proximity to existing residential development and services within the settlement. However, the lands are located within Flood Zone A under the most recent flood maps available for Dundalk.

The Planning System and Flood Risk Management Guidelines (2009) set out a framework for the incorporation of flood risk identification, assessment and management into the planning process. The Guidelines follow the principle that development should not be permitted in flood risk areas, particularly floodplains, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development.

To that end, the Guidelines introduce a sequential test to be applied to areas of high flood risk i.e. Flood Zone A and Flood Zone B.

Taking the foregoing into account, a residential zoning on the subject lands cannot be supported as it would be contrary to the Planning System and Flood Risk Management Guidelines (2009) and policy objectives and policy objective IU 26 of the County Development Plan, which seeks to avoid development in areas at risk of flooding.

Chief Executive's Recommendation:

No change.

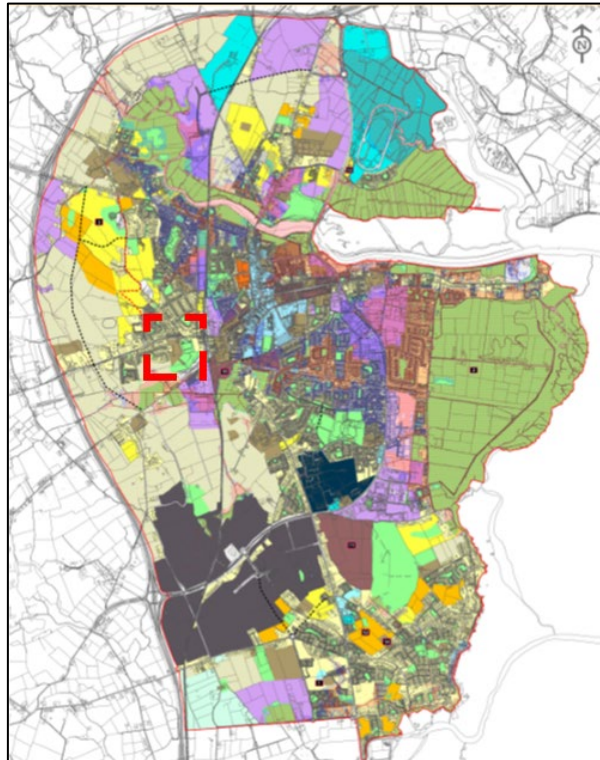
Submission Ref. No.

LH-C208-99

Submitted by:

Stephen Ward Town Planning & Development
Consultants Ltd on behalf of Dundalk Grammar School

Maps showing location of subject lands:



Map included with submission -
subject lands outlined in red.



Current zoning - subject lands outlined
in red.

Summary of Main Issues Raised:

The submission raises concerns regarding the methodology and findings of the Settlement Capacity Audit undertaken in support of Variation No. 4. It is submitted that a number of lands discounted through the assessment process should have been subject to further assessment.



The submission contends that insufficient justification has been provided for the exclusion of certain sites and raises concerns regarding the use of the description "required for other uses" as a basis for discounting lands from further assessment. Particular reference is made to lands identified as DLK 38, which it is claimed represent a centrally located site within the existing built-up area of Dundalk that is capable of being serviced and could contribute towards the delivery of housing, compact growth and sustainable mobility objectives.

Chief Executive's Response:

The submission is noted. The Settlement Capacity Audit was undertaken to identify lands capable of accommodating the revised housing growth requirements arising from the National Planning Framework - First Revision (2025) and associated Section 28 Guidelines. Sites were assessed having regard to their suitability, availability and deliverability, together with their role within the overall zoning strategy for each settlement.

The submission raises concerns regarding the exclusion of certain sites from further assessment, particularly sites identified as being required for other uses, and argues that insufficient justification has been provided for their exclusion. The Chief Executive has carefully considered these concerns. However, while the precise future use of these lands has not been determined, the Chief Executive is satisfied that residential development would not represent the most appropriate use of these lands.

Furthermore, specific reference is made to Site 38 (DLK 38) (Call for Sites No. 72) in Dundalk. While the Chief Executive acknowledges that the site's location within the existing built-up area of Dundalk and its proximity to public transport and services, it was determined that sufficient lands should be retained for community facility and open space purposes to serve both existing and future populations. The Chief Executive considers that that the provision of community and recreational infrastructure to be a critical component of sustainable placemaking and the creating of sustainable communities.

Chief Executive's Recommendation:

No change.

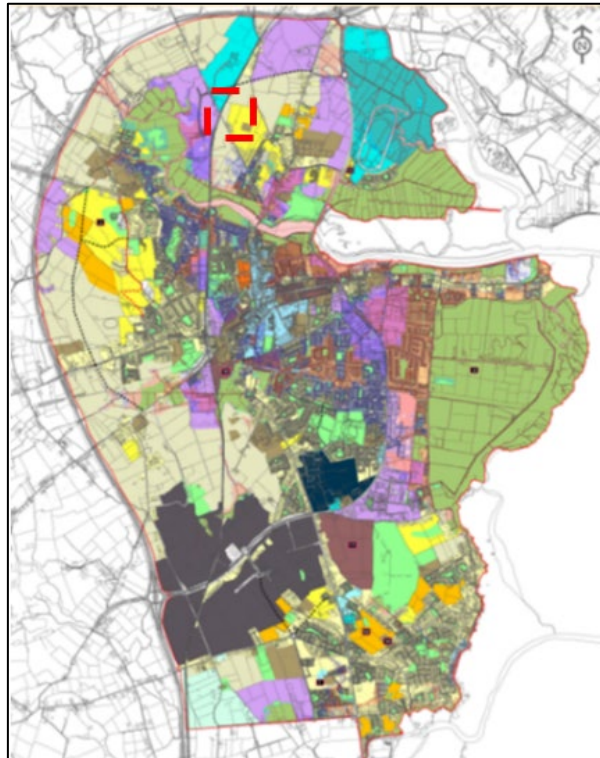
Submission Ref. No.

LH-C208-109

Submitted by:

JSA Planning on behalf of LAJONA Limited

Maps showing location of subject lands:



Current zoning – subject lands outlined in red.

Summary of Main Issues Raised:

The submission seeks the rezoning of lands at Armagh Road, Dundalk from L1 Strategic Reserve / Long Term Strategic Opportunity Area to A2 New Residential Phase 1.

It is submitted that the lands are suitable for residential development, are located adjacent to existing residentially zoned lands and can be developed in conjunction with adjoining lands currently being brought



forward for residential development. The submission states that the lands can be serviced by existing infrastructure and that access can be provided as part of a comprehensive development of the wider landholding.

The submission further states that the lands are well located in relation to Dundalk Town Centre, public transport and community facilities and are capable of contributing towards housing delivery in the short term. It is argued that the lands should be brought forward now to support the increased housing requirements arising from the Revised National Planning Framework.

Chief Executive's Response:

The submission is noted. The subject lands were assessed as DLK2 which included the overall landholding as part of the Settlement Capacity Audit undertaken in support of Variation No. 4.

The assessment concluded that the lands are suitable for residential development, and it is acknowledged that the lands will have an important role to play in the future growth of Dundalk.

Variation No. 4 seeks to identify the lands required to accommodate the revised housing growth requirements during the lifetime of the current Development Plan. In this regard, the Settlement Capacity Audit identified other more suitable sites within Dundalk that are more suitable in terms of accommodating growth in the short to medium term. As a result, the subject lands are not required to meet the revised housing allocation at this time.

Notwithstanding this, the Chief Executive recognises the strategic importance of the wider landholding and its role in the longer-term growth of Dundalk. For this reason, the lands have been identified as a Long-Term Strategic Opportunity Area. This designation recognises the strategic importance of the lands whilst acknowledging that they are not required to meet the revised housing requirements identified through Variation No. 4. It is considered that the development of the overall landholding should be examined as part of a future review of the County Development Plan when the longer-term housing and infrastructure requirements of Dundalk as a whole can be considered in a comprehensive and cohesive manner.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

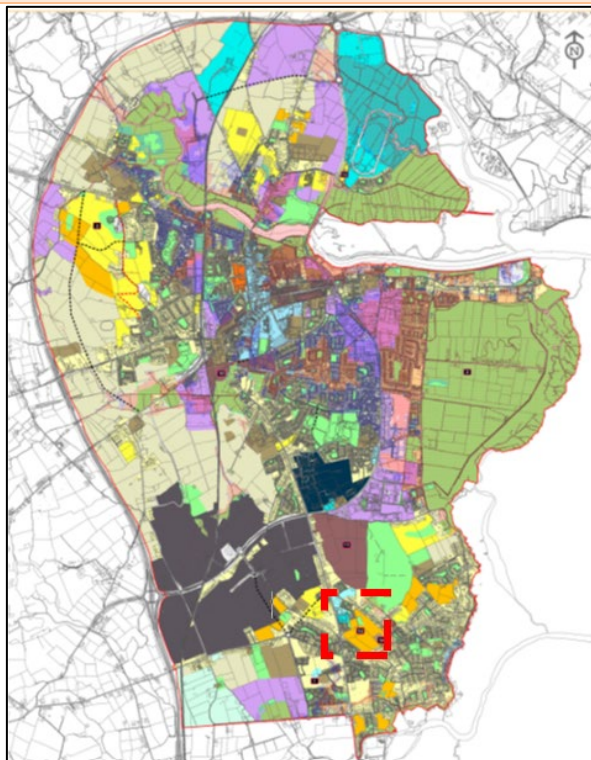
Submission Ref. No.

LH-C208-115

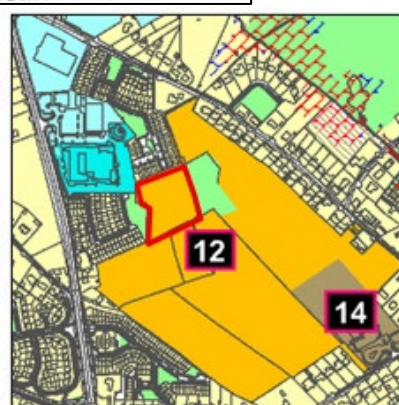
Submitted by:

CSR Land Planning and Design on behalf of
Donal Carroll

Maps showing the location of the subject lands:



Map included within the submission
- subject lands outlined in red



Current zoning – subject lands outlined in red

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 1.1 hectares of land located south of Stamanaran housing estate, east of Fairways Gardens and off Old Golf Links Road, Blackrock, Dundalk from A3 New Residential Phase 2 to A2 New Residential Phase 1.

It is submitted that the lands comprise an infill site within the existing built-up area of Dundalk and represent an opportunity for the consolidation of existing residential development. The submission states that the site is well



located in proximity to schools, community facilities, retail services, public transport, employment opportunities and existing infrastructure and is capable of contributing towards housing delivery during the lifetime of the current Development Plan.

The submission contends that the lands should be considered independently of the wider landholding previously assessed as Site DLK30 through the Settlement Capacity Audit. It is argued that the subject lands constitute a distinct development opportunity and would perform favourably against the infrastructure, accessibility and service-based criteria contained within the Settlement Capacity Audit methodology.

The submission further states that a viable servicing strategy exists for the lands and refers to information provided by consulting engineers and Uisce Éireann in support of the contention that wastewater constraints should not preclude the rezoning of the site for immediate residential development.

The submission also argues that additional residential lands should be identified to support the increased housing requirements for Dundalk and that the subject lands represent a sustainable, serviced and deliverable residential development opportunity capable of contributing towards housing supply in the short term.

Chief Executive's Response:

The submission is noted. The submission contends that the subject site should be considered independently of the wider parcel of lands identified as Site DLK 30 in the Settlement Capacity Audit undertaken in support of Variation No. 4. The Chief Executive acknowledges this and notes that, in a number of instances throughout the Settlement Capacity Audit, smaller parcels of land were considered independently of larger landholdings on other sites where it was considered appropriate to do so. While the lands generally represent an infill opportunity capable of contributing to compact growth and the consolidation of development in this area, the main constraint relates to the Blackrock Wastewater Treatment Plant. This constraint would continue to apply to the subject site if assessed independently and therefore the conclusions of the Settlement Capacity Audit remain valid.

The submission further references information prepared by consulting engineers and correspondence with Uisce Éireann in relation to a potential servicing solution for the lands. This information is noted. However, the information submitted confirms that a permanent wastewater connection remains dependent on upgrade works to the Blackrock Wastewater Treatment Plant.

The purpose of Variation No. 4 is to identify the most suitable and deliverable lands required to accommodate the revised housing growth requirements during the lifetime of the current Development Plan. Having regard to the infrastructure constraints affecting the Blackrock Wastewater Treatment Plant and the availability of alternative and more suitable lands capable of contributing towards housing delivery in the short to medium term, the rezoning of the subject lands is not warranted at this time.

Accordingly, while the Chief Executive acknowledges the merits of the site and its potential to accommodate residential development in the future, it is not considered necessary to rezone the lands to A2 New Residential Phase 1 as part of Variation No. 4. This can be reconsidered through a future review of the County Development Plan.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

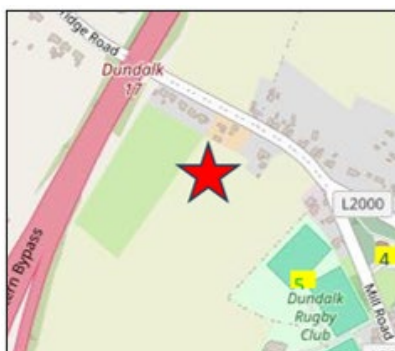
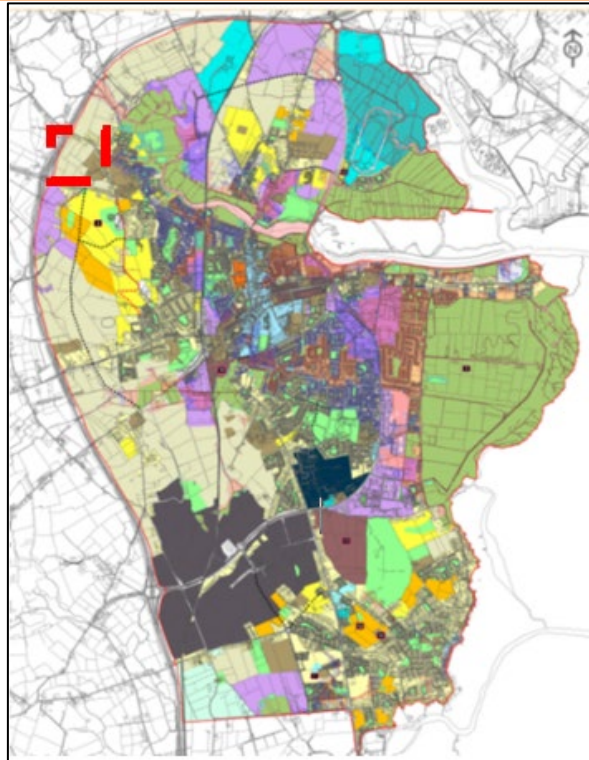
Submission Ref. No.

LH-C208-128

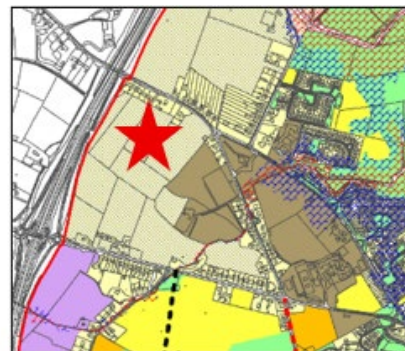
Submitted by:

Stephen Ward Town Planning and
Development Consultants Ltd on behalf of
Conor Mc Ardle and Tom Quigley

Maps showing the location of the subject lands:



Map included within the submission -
subject lands identified with a red star.



Current zoning – subject lands shown
with red star.

Summary of Main Issues Raised:

The submissions states that Proposed Variation No. 4 does not give sufficient weight to sites that are available for development and capable of contributing to housing delivery within the remaining lifetime of the Development Plan. The variation should place greater emphasis on sites with a realistic prospect of being delivered before 2027.



A number of sites in Dundalk were discounted through the Settlement Capacity Audit despite scoring favourably and being available for development. The introduction of the Development Led Infrastructure Initiative (DLI) provides greater opportunities to address infrastructure constraints and that certain discounted sites should therefore have been subject to further assessment.

Reference is made to Site 10a (subject to this submission). It is located within the settlement boundary and existing built-up footprint of the town, is capable of being serviced, has access to utilities and public transport, and is within walking distance of schools, community facilities and sports amenities. The submission also highlights the absence of significant environmental constraints, including flood risk, Natura 2000 designations, protected structures and archaeological features.

It is requested that the Settlement Capacity Audit be revisited and that Site 10a, along with other available and serviceable sites, be reconsidered for residential zoning. These lands are capable of contributing to housing delivery and compact growth objectives during the current plan period.

Chief Executive's Response:

As part of Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and to identify sites capable of contributing towards housing delivery. Several sites were assessed in Dundalk including lands identified as Site 10a (the lands to which the submission pertains). A 'Call for Sites' submission was received on these lands.

The site was subject to both a desktop assessment and site inspection. Having regard to the sites location it was considered that the site on the periphery of Dundalk it was considered that the development of the site would not contribute to compact growth and alternative sites were considered more suitable.

Accordingly, it is not considered appropriate to rezone these lands under this variation.

Chief Executive's Recommendation:

No change.

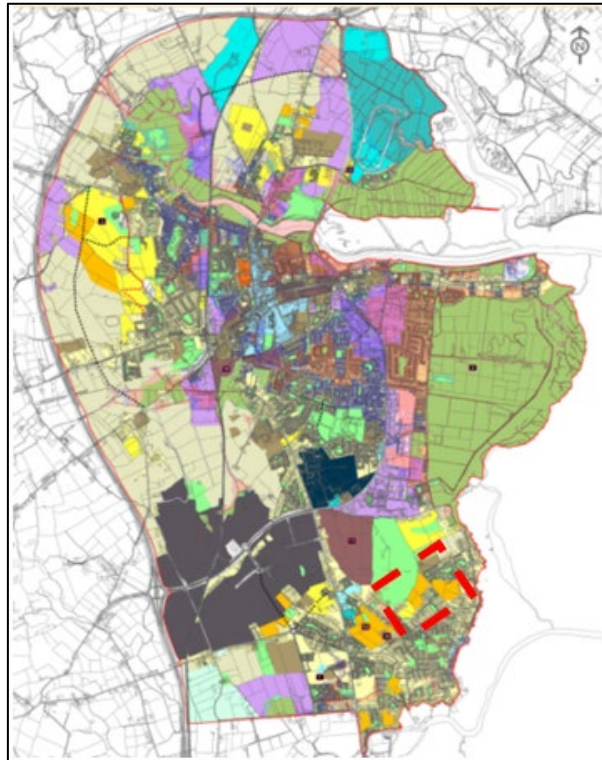
Submission Ref. No.

LH-C208-130

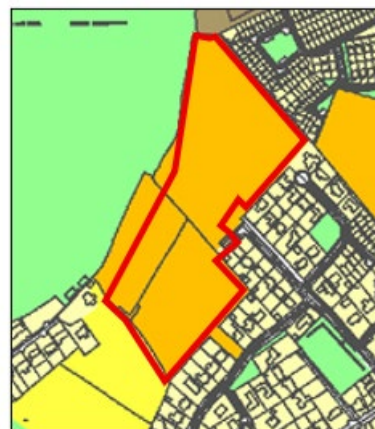
Submitted by:

McGahon Architects Ltd

Maps showing the location of the subject lands:



Map included within the submission
- subject lands outlined in red



Current zoning – subject lands
outlined in red

Summary of Main Issues Raised:

The submitter is requesting that the Council include the parcel of land in the Hamilton area, as highlighted on the enclosed map, within the revised Residential zoning. The subject land is centrally located within the existing settlement boundary, offering an ideal compact growth opportunity that is well-served and well-positioned to



connect efficiently to existing public infrastructure. It is accessible via both Hamilton Avenue and the Cois Farraige estate. It is requested that the planning authority also refer to the previous submissions made in relation to this land by Tom McGahon, which further outline the site context and rationale for residential zoning of the area.

Chief Executive's Response:

The submission is noted. It requests that regard is had to a previous submission on the subject lands however only information included as part of the current submission can be considered.

As part of Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and to identify sites capable of contributing towards housing delivery. Several sites were assessed in Dundalk including lands identified as Site 31 (the lands to which the submission pertains)

The site was subject to both a desktop assessment and site inspection. It was determined that due to constraints at Blackrock Wastewater Treatment Plant no change to the A3 Phase 2 zoning was proposed.

Alternative lands were identified for residential development which were considered more suitable having regard to their overall development potential and ability to contribute towards the housing allocation identified for Dundalk. Accordingly, it is not considered appropriate to rezone these lands under this variation.

Chief Executive's Recommendation:

No change.

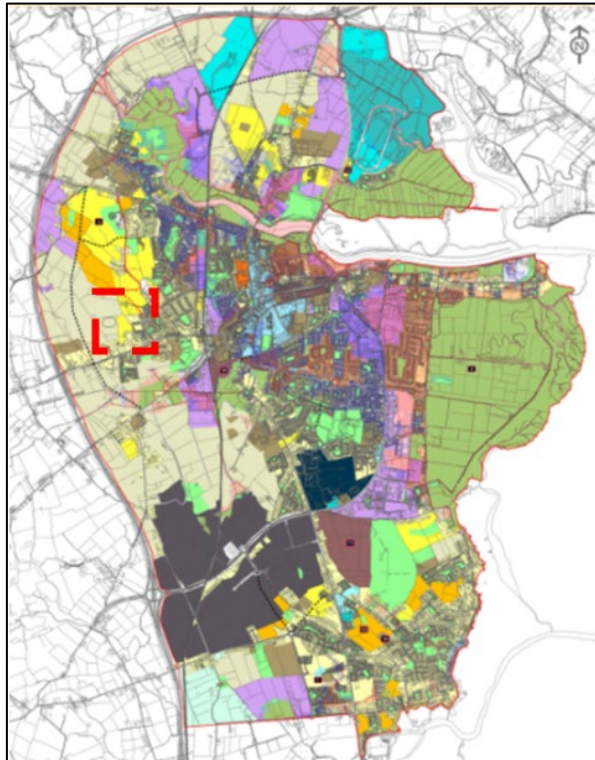
Submission Ref. No.

LH-C208-132

Submitted by:

Jennifer Coleman on behalf of Suzanne Cox,
Michelle Cox and Richard Cox

Maps showing the location of the subject lands:



Map included within submission –
subject lands labelled as 'A' and 'B'



Current zoning – subject lands
outlined in black



Summary of Main Issues Raised:

The submission seeks the rezoning of Site B (c. 3.2 ha) at Lisnawilly, adjoining the Mount Avenue Link Road, from Strategic Reserve to A2 New Residential (Phase 1). It is stated that Site B has been identified by the Council as lands under consideration for rezoning and is well positioned to contribute to housing delivery within the plan period.

The submission states that Site B:

- Could accommodate approximately 100 residential units at an indicative density of 35 units per hectare.
- Adjoins the Lis na Dara residential estate and has direct access to the recently completed Mount Avenue Link Road.
- Is within walking distance of local services, schools and Dundalk Railway Station.
- Is free from significant physical or environmental constraints, including flood risk.

The submission further notes that Site A, which is currently zoned A2 New Residential (Phase 1), contains the family home and lands that will remain in agricultural use during the lifetime of the Development Plan and therefore will not contribute to housing delivery. There is a willingness to discuss redesignating Site A to A3 New Residential (Phase 2) on a like-for-like basis to facilitate rezoning of Site B.

The submission argues that rezoning Site B is consistent with national, regional and local planning policy objectives promoting compact growth and housing delivery on accessible, serviced lands close to existing infrastructure and public transport.

Chief Executive's Response:

As part of Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and to identify sites capable of contributing towards housing delivery. Site B identified in the submission forms part of Site 13 which was subject to both a desktop assessment and site inspection as part of the Settlement Capacity Audit.

Site B identified in the submission does not adjoin the Mount Avenue Link Road and is not currently serviced, with the nearest combined sewer and water supply infrastructure located approximately 140m to the east. The development of Site A would contribute to compact growth whereas the lands immediately adjoining the Site B to the east remain undeveloped.

Alternative lands were identified for residential development which were considered more suitable having regard to their overall development potential and ability to contribute towards the housing allocation identified for Dundalk. Accordingly, it is not considered appropriate to rezone these lands under this variation.

Notwithstanding this, the subject lands may be capable of accommodating residential development in the future, and that a comprehensive and cohesive review of all land use zonings shall be undertaken as part of a future review of the County Development Plan.

Chief Executive's Recommendation:

No change.

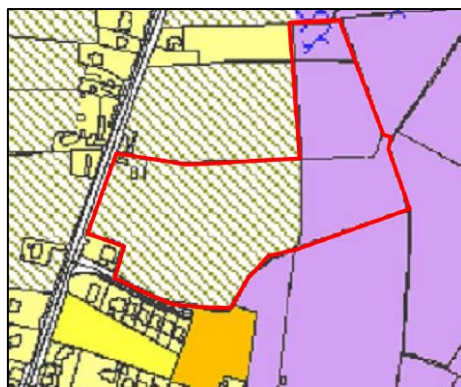
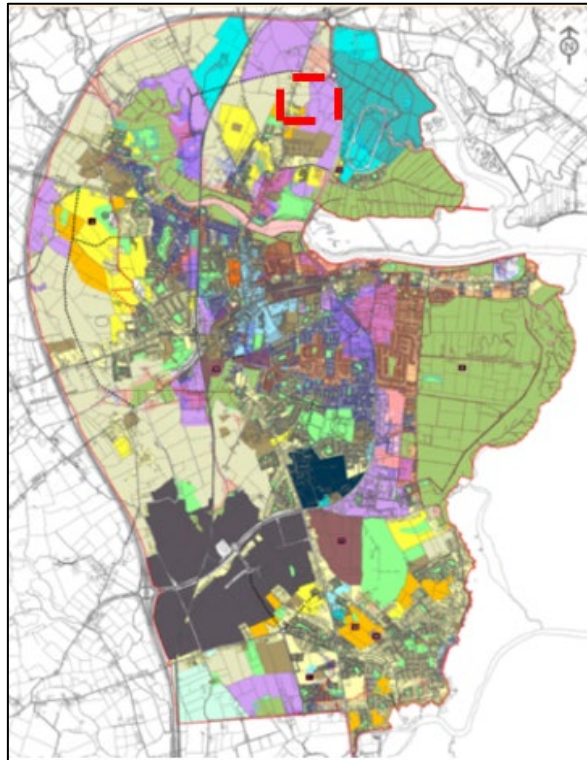
Submission Ref. No.

LH-C208-143

Submitted by:

Peter Sheils

Maps showing the location of the subject lands:



Current zoning – subject lands outlined in red

Summary of Main Issues Raised:

Submission relates to part of a c. 5.06ha total landholding in single ownership located at Dowdallshill / Old Newry Road. The submission relates specifically to approximately 3.02ha of L1 Strategic Reserve lands.

1. Executive Summary

The lands were submitted to Louth County Council under the 'Call for Sites' process (Submission No. 49). It is stated that the site was assessed as part of a larger group of sites and that the scoring is inherently flawed as the



scores attributed to other lands may have negatively affected the assessment of the site presently under consideration.

The site itself benefits from existing water and wastewater infrastructure, direct road frontage, public lighting, cycle infrastructure and public transport. It is also very close to the proposed strategic link road between the Newry Road and Armagh Road.

2. Land Ownership and Planning Context

Folio reference for the land holding is provided. 3.02ha are zoned L1 Strategic Reserve, and 2.04ha are zoned E1 General Employment.

3. Suitability of the Subject Site

3.1 *Deliverability and Servicing*

The subject lands represent a deliverable, serviceable and accessible site with direct frontage onto the Old Newry Road. The site is traversed by an existing gravity sewer, is adjacent to an existing public watermain, is served by existing public lighting. Additionally, a pre-connection enquiry was submitted to Irish Water in May 2026.

3.2 *Accessibility and Sustainable Transport*

The site is near Bus Éireann Routes 160 and 161, there are existing cycle lanes along the road frontage, it is located approximately 2.6 km from Dundalk Town Centre and is in proximity to the proposed Newry Road-Armagh Road strategic link road.

3.3 *Sequential and Compact Growth*

The site adjoins the existing built-up area and is adjacent to a recently completed residential development. Development of the site would support compact growth objectives and efficient use of infrastructure.

3.4. *Development Potential and Density*

The subject site is suitable for medium-density residential development in the range of 35–50 units per hectare. The c. 3.02ha L1 lands could deliver approximately 90–150 residential units

3.5. *Environmental and Planning Constraints*

There are no environmental designations or flood risk constraints identified (EPA/Natura/CFRA), affecting the lands subject to standard planning and environmental assessments.

3.6. *Compliance with the Councils Assessment Criteria*

The subject lands satisfy key criteria identified by Louth County Council.

4. Contribution to Balanced Urban Growth

The subject lands support balanced growth north of the Castletown River and overall settlement structure.

Chief Executive's Response:

As part of Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and to identify sites capable of contributing towards housing delivery. Several sites were assessed in Dundalk including lands identified as Site 4 (the lands to which the submission pertains). A 'Call for Sites' submission was received on the L1 lands (Submission No. 49).

The site was subject to both a desktop assessment and site inspection. Whilst it is acknowledged that water and wastewater services traverse the site there are potential network constraints in relation to both.

Alternative lands were identified for residential development which were considered more suitable having regard to their overall development potential and ability to contribute towards the housing allocation identified for Dundalk. Accordingly, it is not considered appropriate to rezone these lands under this variation.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

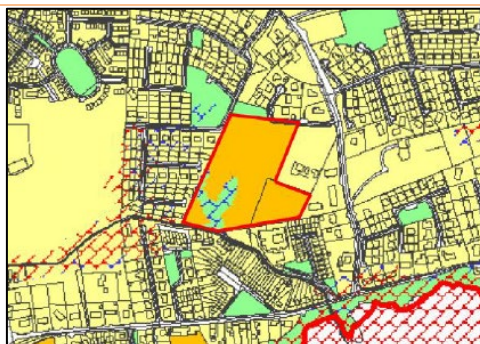
LH-C208-146

Submitted by:

Stephen Ward Town Planning & Development
Consultants on behalf of B.N & B Carroll

Maps showing the location of the subject lands:





Map included within the submission - subject lands outlined in red and the current zoning.

Summary of Main Issues Raised:

Request to rezone lands west of Seafield Road, Springfield, Blackrock, Dundalk from A3 New Residential Phase 2 to A2 New Residential Phase 1, for the following reasons:

The site is surrounded by residential development offering an infill/rounding off opportunity representing sequential and compact growth.

Dundalk is a Regional Growth Centre, and Blackrock is one of the main residential areas. With direct link to major employers, schools and a wide range of community, retail and social infrastructure. The site is served by existing footpaths, public lighting and active travel infrastructure.

Planning permission for 45 dwellings was granted on the site under Planning Ref. 07/372 but was not implemented due to the economic downturn following the 2008 financial crisis.

Foul sewer and surface water infrastructure are available, and access can be provided through Springfield.

The lands are in single ownership and are available for development immediately. The site could contribute to housing supply during the current plan period

The submission challenges the reliance placed on the SFRA and argues that a site-specific flood risk assessment prepared by consulting engineers provides a more accurate assessment of flood risk affecting the lands.

There is a severe housing shortage nationally. The American Chamber of Commerce Ireland and IBEC, have identified the housing shortage as a challenge to bringing new employment opportunities to Ireland, Enterprise Ireland have also voiced concerns.

Chief Executive's Response:

As part of Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and to identify sites capable of contributing towards housing delivery. Several sites were assessed in Dundalk including lands identified as Site 29 (the lands to which the submission pertains).

The site was subject to both a desktop assessment and site inspection. It was determined that due to constraints at Blackrock Wastewater Treatment Plant no change to the A3 Phase 2 zoning was proposed.

Alternative lands were identified for residential development which were considered more suitable having regard to their overall development potential and ability to contribute towards the housing allocation identified for Dundalk. Accordingly, it is not considered appropriate to rezone these lands under this variation.

Chief Executive's Recommendation:

No change.

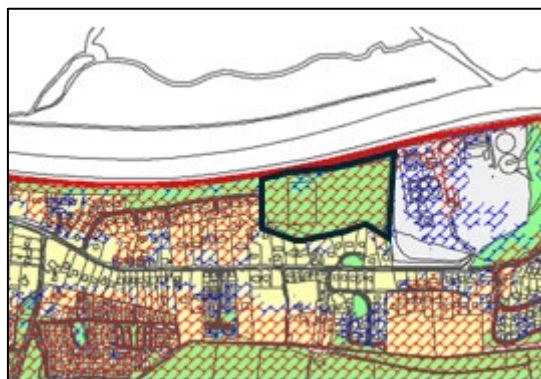
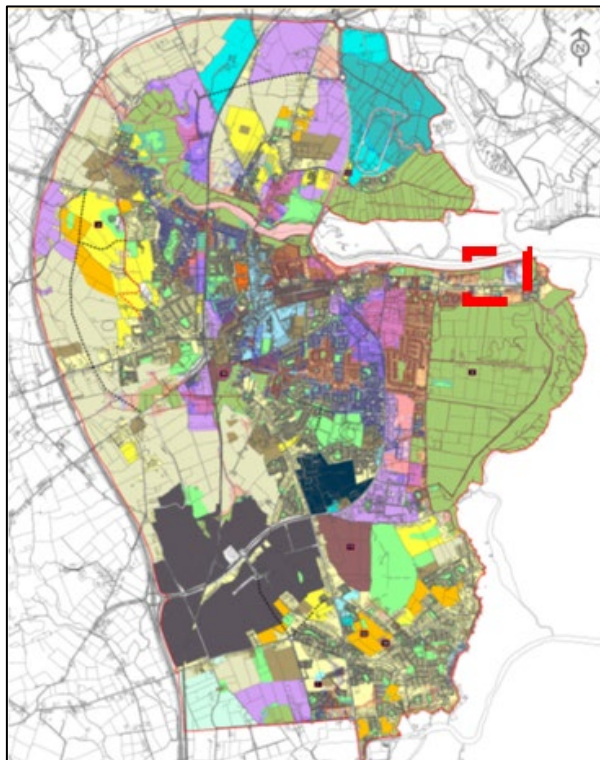
Submission Ref. No.

LH-C208-151

Submitted by:

Joanne Daly

Maps showing the location of the subject lands:



Current zoning – subject lands outlined in black



Summary of Main Issues Raised:

The submission supports the Council's Assessment of Site DLK 40 through the Settlement Capacity Audit concluding that it should be discounted at Stage 1 due to flooding, the requirement for the land for other use and the requirement for wastewater treatment plant buffer.

This land is currently zoned H1 (open space). We support the Council's retention of the designation of this land to remain as such. Given its location with Flood Zone A and its proximity to the wastewater treatment plant, the site is unsuitable for residential zoning.

Chief Executive's Response:

Having regard to the location of the site and the objective of promoting 10-minute neighbourhoods, it is considered that the H1 Open Space zoning is most appropriate for this location, as it would allow for recreational and amenity uses that will serve the local community.

Chief Executive's Recommendation:

No change.



2.3.3 Chief Executive's Summary, Response and Recommendations on Submissions received in relation to Long Term Strategic Opportunity Areas



Submission Ref. No.

LH-C208-9

Submitted by:

Tara Tine

Summary of Main Issues Raised:

Long Term Strategic Opportunity Areas

Introduction of Long-Term Strategic Opportunity Areas is welcomed. This strategic approach could be strengthened by expressly recognising the historic environment and cultural landscape.

The historic environment is an equally important part of that receiving environment and should be considered from the earliest stage. Use of the Historic Landscape Characterisation, as promoted by the Heritage Council, is advocated. This approach is consistent with internationally recognised conservation principles.

Request that the policies relating to Long-Term Strategic Opportunity Areas be amended to include explicit reference to consideration of the historic environment and, where appropriate, Historic Landscape Characterisation. This would be consistent with both the Heritage Council, National Monuments Service's and the National Planning Framework's policy framework for ensuring that sustainable growth is informed by a comprehensive understanding of the historic environment.

Chief Executive's Response:

The Chief Executive fully recognises the significance of the historic environment and cultural landscape, and the important contribution these assets make to informing and shaping future development, including development associated with the Long-Term Strategic Opportunity Areas.

The Louth County Development Plan 2021–2027 contains a comprehensive policy framework for the protection and management of heritage assets. Chapter 8 addresses Natural Heritage, Biodiversity and Green Infrastructure, while Chapter 9 relates to the Built Heritage. The relevant policy objectives contained within these chapters will be applied in the assessment of planning applications to ensure that proposed development appropriately considers and responds to the cultural and historic landscape

In addition, Chapter 13, *Development Management Guidelines*, sets out the requirements for the preparation of masterplans and includes a reference to environmental constraints including archaeology.

Notwithstanding the above, the Chief Executive concurs that the narrative text and policy objectives relating to the Long-Term Strategic Opportunity Sites would benefit from the inclusion of specific references to the historic environment and cultural landscape, thereby reinforcing the importance of these considerations in the planning and development of such strategic locations.



Chief Executive's Recommendation:

To include additional wording pertaining to cultural and historic landscape:

Policy Objective CS XX:

To undertake initial studies to inform the future development of each Long-Term Strategic Opportunity Area, to include:

Assessment of existing land use and receiving environment;

Environmental and ecological assessment;

Assessment of infrastructure and servicing capacity;

Flood risk and climate resilience considerations.

Assessment of historic and cultural assets

The outcome of these studies will inform the extent, phasing and layout of any future development and may result in changes and refinement to the lands identified.

Any future development of these lands (subject to rezoning) shall be guided by a comprehensive masterplan or appropriate framework, which shall:

Promote compact growth and sustainable settlement patterns;

Integrate land use and transport including prioritising sustainable modes;

Ensure co-ordinated delivery of infrastructure and community facilities;

Provide for employment, education and open space;

Protect and enhance green infrastructure networks;

Support climate action and resilience;

Protect biodiversity, ensuring no net loss of ecological value.

Protect and enhance historic and cultural assets.

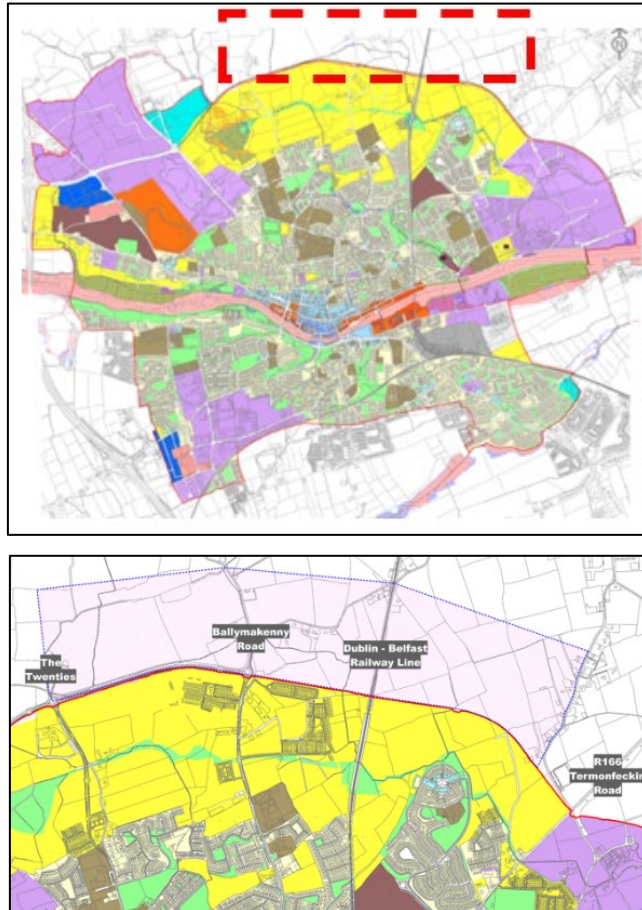
Submission Ref. No.

LH-C208-79

Submitted by:

RMLA Planning Consultants on behalf of Tesco Ireland Limited

Maps showing the location of the subject lands:



Long term Strategic Opportunity Area - Drogheda

Summary of Main Issues Raised:

The submission highlights the importance of the retail sector in supporting sustainable growth of local towns across County Louth, ensuring essential services are provided with existing and future communities.

The submission seeks that retail infrastructure evolves in tandem with the proposed housing growth, ensuring new and existing communities have access to appropriately scaled convenience shopping and local services. The submission welcomes the opportunity to engage with the planning authority in respect of the Proposed Variation No.4 of the Louth County Development Plan 2021-2027 (as varied).

Port Access Northern Cross Route - Drogheda

The submission highlights that Phase 1 of the Port Access Northern Cross Route (PANCR) has been completed and that Phase 2 of the Port Access Northern Cross Route is scheduled for completion at the end of 2026. The



submission supports the proposed Long-Term Strategic Opportunity Area in North Drogheda which identifies c. 170ha of lands currently zoned as Rural Policy Zone 2.

The submission lays out the wording within Policy Objective CS XX, and states that the policy objective to undertake initial studies to form the development of lands north of the Port Access Northern Cross Route is welcomed given the significant quantum of lands identified. Notwithstanding this, the submission requests that the policy objective explicitly recognises the need to plan for future retail centres to serve the anticipated population growth within this area. The submission emphasises the importance of the distribution and timing of future retail provision to ensure that retail infrastructure is delivered in tandem with residential development and forms an integral component of sustainable community development. Accordingly, it is recommended that the scope of the proposed capacity studies listed within Policy Objective CS XX is expanded to include an assessment of the requirement, and appropriate locations for retail provision.

Future Retail Provision

Planning policy should therefore retain sufficient flexibility to accommodate changing retail needs while supporting compact growth and sustainable settlement patterns. Convenience-led retailing performs an important role in supporting sustainable settlement patterns, providing access to retail services within proximity to homes, workplaces, and public transport networks. This reduces the need for longer-distance travel, supports active travel and contributes towards more sustainable and resilient communities.

The submission requests that the planning authority ensures that retail infrastructure is planned alongside residential development and delivered at an appropriate stage in the phasing of development.

Details of broad retail categories and their indicative floorspaces and typical retail function have been provided within this submission, to assist in informing future retail provision within the Long-Term Strategic Opportunity Areas. Emphasis is placed on the importance of retail units of up to c.2,500 sqm in ensuring the delivery of compact settlements with localised shopping.

Conclusion

The submission welcomes the publication of the Proposed Variation to No.4 to the Louth County Development Plan 2021-2027 and the opportunity to engage with the local authority.

In light of the significant residential growth proposed within lands north of the Port Access Northern Cross Route it is essential that retail facilities are planned and delivered in a manner that supports the creation of sustainable, well serviced communities.

Chief Executive's Response:

The Chief Executive fully recognises the significance of the provision of retail development in conjunction with the provision of additional housing, and the importance of a thorough assessment of appropriate locations for retail facilities and phasing arrangements in supporting compact growth and sustainable development, including development associated with the Long-Term Strategic Opportunity Areas.

The narrative associated with the Long-Term Strategic Opportunity Area in Drogheda specifically identifies the potential for the lands around the future Transport Hub to be utilised for neighbourhood and community facilities and services. This would include the provision of retail services. In addition, the policy objective requires an "assessment of the existing land use and receiving environment to be carried out." This assessment would extend to existing retail provision in the area.

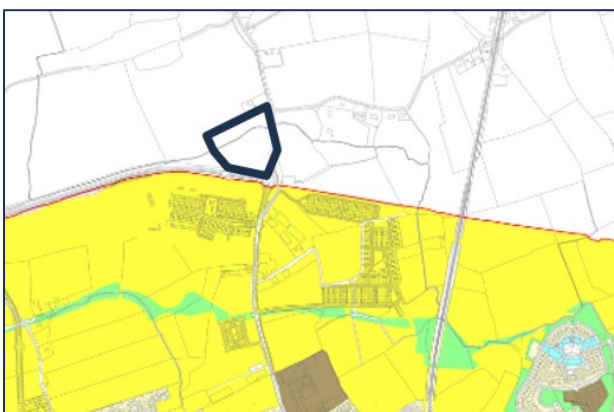
Chief Executive's Recommendation:

No change.

LH-C208-96

Brady Hughes Consulting on behalf of The Callan family

Maps showing the location of the subject lands:



Settlement boundary map – subject lands
outlined in black



Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 3.5ha of land at Ballymakenny Road, Drogheda to A2 New Residential Phase 1 and the extension of the settlement boundary to include these lands.

The submission welcomes the identification of the lands for the Long-Term Strategic Opportunity Area but considers that the lands should be zoned for residential development under this variation. It is submitted that the lands are available for development, are capable of being serviced, benefit from direct access to the Port Access Northern Cross Route and represent a logical extension of the existing urban area.

The submission further states that additional lands will be required to accommodate future housing growth in Drogheda and raises concerns regarding the deliverability of a number of existing residentially zoned sites. It is argued that the subject lands could contribute to housing delivery during the current plan period and should be prioritised due to their location and access to infrastructure.

Chief Executive's Response:

The submission is noted.

The subject lands are included within the proposed Long-Term Strategic Opportunity Area identified as part of Variation No. 4. The purpose of this designation is to recognise the *potential* role of lands north of the Port Access Northern Cross Route (PANCR) in accommodating the longer-term growth of Drogheda while ensuring that any future development takes place in a coordinated and plan-led manner.

The Chief Executive does not consider it appropriate to zone the lands A2 New Residential Phase 1 as part of Variation No. 4. The purpose of the Variation is to identify the lands required to accommodate the revised housing growth requirements during the lifetime of the current Development Plan. In this regard, the Settlement Capacity Audit assessed lands having regard to their suitability, availability and deliverability and identified sufficient capacity to accommodate the revised housing allocation in the short to medium term from alternative sites.

The Chief Executive notes that Sites 15 and 16, which are located in the same general area north of the PANCR, were assessed through the Settlement Capacity Audit and discounted. The assessment concluded that lands north of the PANCR should be considered as part of a comprehensive approach to the future growth of Drogheda rather than through individual extensions to the settlement boundary. The assessment also identified infrastructure requirements and the need to ensure that future residential communities are supported by appropriate infrastructure, services and community facilities.

While the Chief Executive acknowledges that the subject lands possess a number of positive attributes and could have an important role in the future growth of Drogheda, it remains satisfied that sufficient and more appropriate zoned lands are available within the existing settlement boundary to accommodate the revised housing requirements at this time.

Accordingly, the Chief Executive does not consider it necessary to extend the settlement boundary or zone additional residential lands at this location as part of Variation No. 4.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

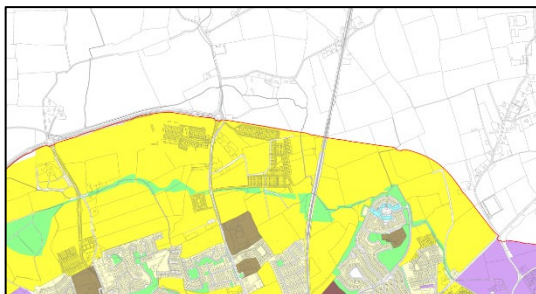
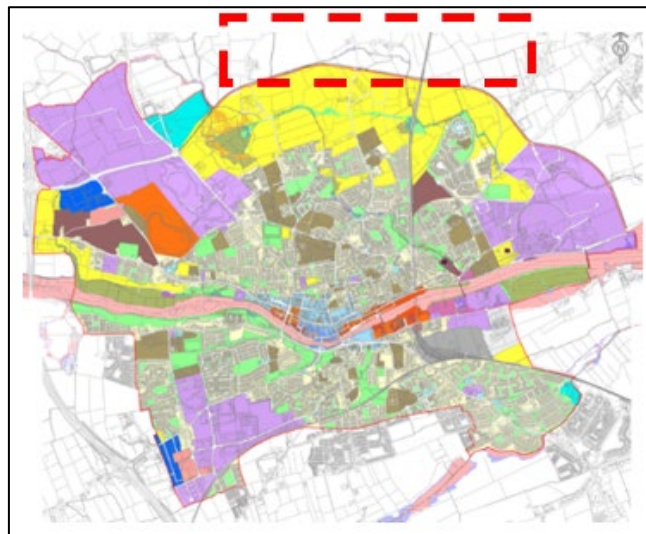
LH-C208-105

Submitted by:

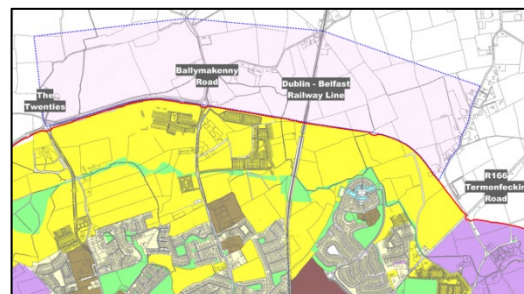
Brady Hughes Consulting

Maps showing the location of the subject lands:

a. Drogheda Long Term Strategic Opportunity Area

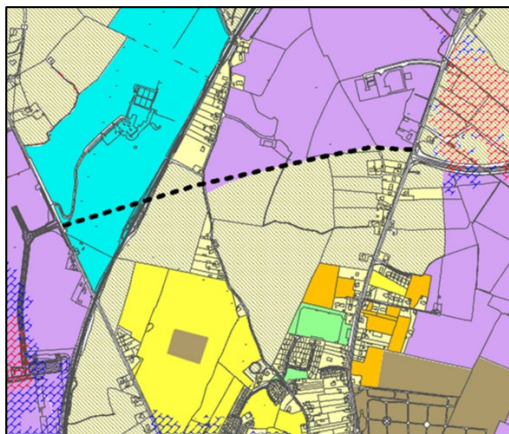
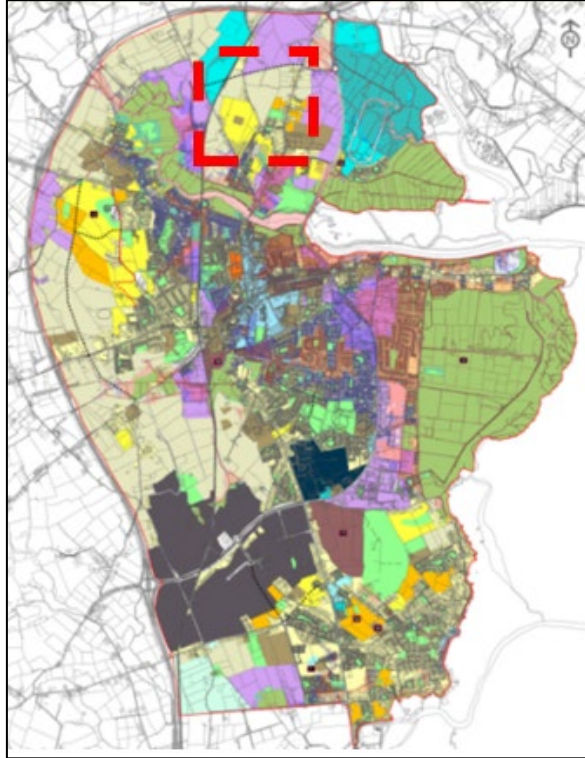


Current Plan

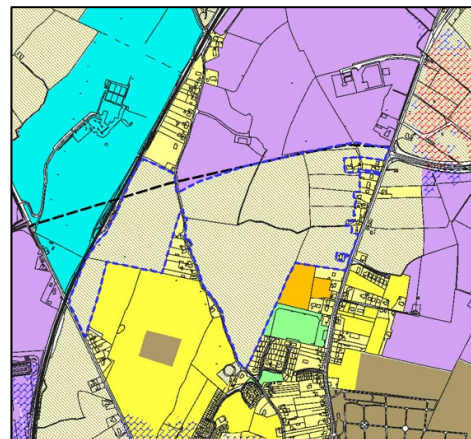


Indicative Long Term Strategic Opportunity
Area

b. Dundalk Long Term Strategic Opportunity Area



Current Plan



Indicative Long Term Strategic Opportunity
Area (blue dash)

Summary of Main Issues Raised:

It is requested that the text and associated policy objectives relating to the proposed Long Term Strategic Opportunity Areas does not unintentionally prevent the consideration of strategic transport, sports, recreation, community, and enabling infrastructure that would prejudice the comprehensive future development of the North Drogheda area.

The submission seeks to retain the plan-led safeguards for the future comprehensive development of the area however highlights that taking account of the transition to the 10-year Development Plan format and the



extension of the current Development Plan to 2030 as provided for in the 2026 Planning and Development Amendment Act it is important that such wording does not prevent the delivery of infrastructure and facilities that would serve and benefit the existing population in the North Drogheda area.

Concerns were raised with the following text:

“The inclusion of these lands does not constitute zoning for development as part of the current Plan. Any future development will be subject to rezoning through a future Development Plan informed by detailed assessment.”

Why this is problematic

- “Any future development” is unqualified and may be interpreted as applying to every form of development, rather than to comprehensive housing-led or mixed-use development.
- It sits uneasily with Amendment 36, which identifies a transport hub, integrated bus services, park-and-ride facilities, community and education facilities, recreational facilities and employment-generating uses as opportunities for the area.
- It could require projects that support or enable the future masterplan to await a later rezoning exercise, even where they would not prejudice coordinated development.
- If the current Plan continues to 2030, a blanket interpretation risks delaying needed infrastructure and facilities and causing an unnecessary loss of momentum.

Policy Objective CS XX:

“To protect the Long-Term Strategic Opportunity Areas by resisting piecemeal, premature or ad hoc development that would prejudice the comprehensive planning and future coordinated development of these lands.”

Why this is problematic

- The terms “piecemeal”, “premature” and “ad hoc” are broad and could capture strategic standalone infrastructure or community facilities as well as harmful fragmented development.
- The objective does not distinguish between proposals that prejudice future comprehensive planning and proposals that catalyse, support or enable it.
- It provides no clear basis for considering a strategic proposal on its merits where it is supported by appropriate environmental, transport and infrastructure assessment and justification.

Conclusion

It is requested that the relevant sections of the Variation relating to the proposed Long Term Strategic Opportunity Areas be reviewed and refined so that they continue to protect the area from premature, piecemeal or housing-led comprehensive development, without inadvertently closing off consideration of strategic or enabling development and/or facilities that would serve the existing population and support and perhaps catalyse future coordinated growth.

This submission does not seek to zone the lands or dilute the requirement for future master planning and rezoning of comprehensive development.

Chief Executive’s Response:

The submission is noted. The purpose of identifying the Long-Term Strategic Opportunity Areas is to provide a clear direction for future growth in Dundalk and Drogheda and to assist in informing long-term infrastructure planning and investment decisions. As part of the transition to a 10-year Development Plan cycle it is important,



in consultation with infrastructure providers, to identify future development areas that will inform infrastructure investment decisions that will provide the enabling infrastructure to release these lands for development.

The reference in the text indicating that the Long-Term Strategic Opportunity Areas does not represent a land use zoning is a point of clarity. It is also important to note that as detailed on the maps the extent of the areas identified is indicative and subject to change following more detailed assessment.

The submission raises a valid point in relation to the text and policy objectives set out in proposed Variation No. 4. It is accepted that the current wording could be interpreted as restricting the consideration of strategic infrastructure, services, amenities or other enabling development that would not prejudice the comprehensive future development of the wider area.

In the eastern-most section of the Long-Term Strategic Opportunity Area in Drogheda there are lands that have been identified as a location for a 'sports centre' in the North Drogheda Environs Masterplan 2006. The intention of the masterplan is that these lands would be developed in tandem with the phased development of the residential lands in the masterplan area and would be an important recreational and community amenity to the local population and wider catchment. It is not the intention of the inclusion of lands within this 'Long Term Strategic Opportunity Area' to restrict these lands coming forward for development should a proposal be progressed. Instead, the intention is to highlight the area as a future location for development. In this context it is considered that further clarity is required to address this issue.

Taking this into account it is recommended that additional narrative is inserted into the text associated with the Long-Term Strategic Opportunity Area for Drogheda clarifying the lands that have been identified for sports, recreational and other ancillary uses. Subject to the design and layout of any development on these lands taking account of the fact that the adjacent lands may be developed in the future, it is considered that a proposal could be brought forward on these lands in advance of any Masterplan for the wider Long Term Strategic Opportunity Area being finalised.

It is also acknowledged that a degree flexibility should be incorporated into the narrative and policy objectives for the Long-Term Strategic Opportunity Areas should a proposal be brought forward by infrastructure providers for enabling infrastructure such as electricity, water services, telecommunications or transport related infrastructure such as a park and ride or rail-based infrastructure. This flexibility would ensure that consideration could be given for such proposals in advance of a Masterplan being finalised.

The provision of this additional text would enable individual proposals to be considered on a case-by-case basis where it can be clearly demonstrated such development proposals could be progressed without negatively impact on the build out of the Long-Term Strategic Opportunity Area.

Chief Executive's Recommendation:

1. Amend the text relating to Long Term Strategic Opportunity Area No.2 in Drogheda as follows:

Phase 1 of the Port Access Northern Cross Route (PANCR) has been completed, with Phase 2 scheduled for completion by the end of 2026. Funding has also been secured for Phase 3 of the project under the Housing Infrastructure Investment Fund (HIIF), which will include the construction of a railway underpass and providing a link between Phase 1 and 2 of the projects. This next phase will not only support the development of residential lands but will also significantly enhance connectivity and permeability within the wider area.

In addition to the improved road connectivity the PANCR is providing, there is an opportunity to develop a rail-based Transport Hub that would serve the emerging residential community to the south of the PANCR. This



would include the population residing east of the railway track and the surrounding catchment to the north of Drogheda town centre.

This Transport Hub could include integrated bus services and associated facilities along with a park and ride. Associated with this Transport Hub there is also an opportunity to create a residential neighbourhood with associated neighbourhood, education, community facilities and services in combination with lands that could facilitate economic investment and employment generating uses.

An assessment of the capacity of existing social and physical infrastructure (including schools, community buildings, recreational facilities, neighbourhood services, energy, transport and water services) will be carried out to determine any deficits and future investments/upgrades required to facilitate the release of lands north of the PANCR for development.

The assessment relating to transport/roads will include an analysis of the motorway interchange at Drogheda North (Jn 10) Pedestrian connectivity between the potential future Transport Hub and other land uses north of the PANCR with the existing and emerging residential areas south of the PANCR would also need to be identified.

The findings of these assessments will inform the future development strategy for this area. The location of these lands is set out in Figure xx below. Note that the area identified on the map is indicative and may be subject to change following more detailed assessments.

Within this Long-Term Strategic Opportunity Area east of the railway line there are lands identified in the North Drogheda Environs Masterplan 2006 as a location for a proposed sports centre. This Plan recognises the potential for these lands to accommodate sports, recreational, and other ancillary uses that would serve the residential population in North Drogheda and the wider area. The identification of the Long-Term Strategic Opportunity Area does not seek to prejudice the progression or delivery of such infrastructure and facilities. In this context consideration may be given to proposals for sports, recreational, and other ancillary uses on these lands prior to a masterplan for the wider Long Term Strategic Opportunity Area being finalised, subject to any design, layout and infrastructure provision for such development taking account of the potential for adjacent lands being developed in the future.

Consideration may also be given for enabling infrastructure such as electricity, water services, telecommunications or transport related infrastructure such as a park and ride or rail-based infrastructure in advance of any masterplan being finalised, subject to any proposals taking account of the future development potential of surrounding lands in any proposals.

2. Amend the following paragraph following the Table providing the description of the Long-Term Strategic Opportunity Areas as follows:

The inclusion of these lands does not constitute zoning for development as part of the current Plan. ~~Any future development will~~ The lands within the Long-Term Strategic Opportunity Areas may be subject to rezoning through a future Variation/Development Plan informed by detailed assessment. Proposals for infrastructure related development or sports, recreational, and other associated facilities prior to any rezoning will be considered on a case-by-case basis.



Policy Objective CS XX: Long term Strategic Opportunity Areas

The Council will support a plan-led and sequential approach to the future development of the Long-Term Strategic Opportunity Areas identified in Dundalk and Drogheda in order to meet the projected housing and land-use needs of the County beyond the horizon of the current County Development Plan, subject to future rezoning or as set out in the narrative in Section ** of this Plan 'Long Term Strategic Opportunity Areas', at the following locations:

- Lands between Newry Road, Doylesfort Road and Armagh Road, Dundalk (extent of lands on zoning map indicative only).
- Lands north of the PANCR, to the east and west of the railway line Drogheda (extent of lands on zoning map indicative only).

Policy Objective CS XX:

To undertake initial studies to inform the future development of each Long-Term Strategic Opportunity Area, to include:

- Assessment of existing land use and receiving environment;
- Environmental and ecological assessment;
- Assessment of infrastructure and servicing capacity;
- Flood risk and climate resilience considerations.

The outcome of these studies will inform the extent, phasing and layout of any future development and may result in changes and refinement to the lands identified.

Any future development of these lands (subject to rezoning or as set out in the narrative in section ** of this Plan 'Long Term Strategic Opportunity Areas') shall be guided by a comprehensive masterplan or appropriate framework demonstrating any proposal is compatible with the requirements of the Development Plan, which shall:

- Promote compact growth and sustainable settlement patterns;
- Integrate land use and transport including prioritising sustainable modes;
- Ensure co-ordinated delivery of infrastructure and community facilities;
- Provide for employment, education and open space;
- Protect and enhance green infrastructure networks;
- Support climate action and resilience;
- Protect biodiversity, ensuring no net loss of ecological value.

Policy Objective CS XX:

To protect the Long-Term Strategic Opportunity Areas by resisting piecemeal, premature or ad hoc development that fails to demonstrate compatibility with the potential future land uses envisaged within the Long-Term Strategic Opportunity Areas as set out in Table ** of this Plan or would prejudice the comprehensive planning and future coordinated development of these lands.

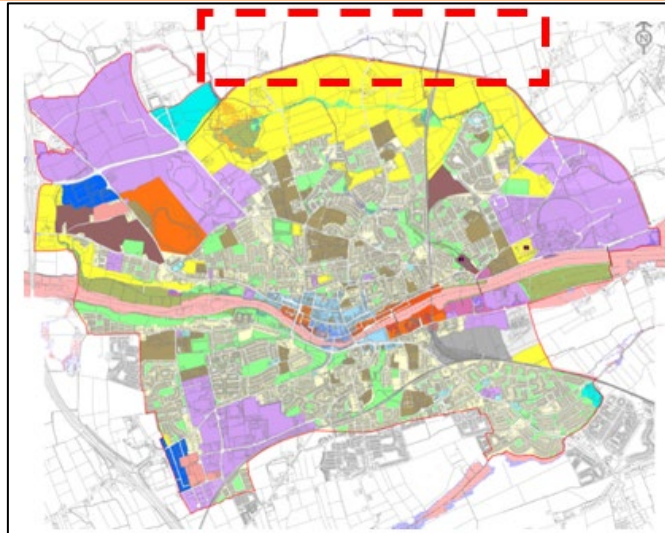
Submission Ref. No.

LH-C208-118

Submitted by:

Brady Hughes Consulting on behalf of
Propchain Solutions, Conn Sands and Imelda
Sands

Maps showing the location of the subject lands:



Map included within the submission
- subject lands outlined in red



Current zoning – subject lands outlined
in black

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 8 acres of land north of the Port Access Northern Cross Route at Twenties Lane, Drogheda to A2 New Residential Phase 1 and the extension of the settlement boundary to include these lands. Alternatively, the submission requests that the lands be incorporated within the proposed Long-Term Strategic Opportunity Area.

It is submitted that the lands occupy a strategic location adjacent to the Port Access Northern Cross Route and Twenties Lane Roundabout, are available for development and are capable of accommodating a residential



scheme in the short term. The submission states that the lands benefit from access to existing and planned infrastructure.

The submission further contends that the lands are capable of contributing towards housing delivery during the lifetime of the current Development Plan and that additional lands should be identified to provide flexibility should existing residentially zoned lands fail to come forward as anticipated.

The submission also states that, if the lands are not considered suitable for immediate residential zoning, they should be included within the Long-Term Strategic Opportunity Area.

Chief Executive's Response:

The submission is noted. The purpose of the Variation is to identify the lands required to accommodate the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines during the lifetime of the current Development Plan. In this regard, the Settlement Capacity Audit assessed lands having regard to their suitability, availability and deliverability and has identified sufficient capacity to accommodate the revised housing allocation in the short to medium term from alternative more suitable sites.

The Chief Executive notes that the subject lands were assessed as Site 15 in the Settlement Capacity audit and were subsequently discounted. The assessment concluded that lands north of the Port Access Northern Cross Route should be considered as part of a comprehensive approach to the future growth of Drogheda rather than through individual extensions to the settlement boundary.

The submission also seeks the inclusion of the lands within the Drogheda Long-Term Strategic Opportunity Area. The Chief Executive notes that the extent of the Long-Term Strategic Opportunity Area identified through Variation No. 4 is indicative in nature and has been identified having regard to its strategic role in accommodating the longer-term growth of Drogheda. Whilst the location of the subject lands in proximity to the Port Access Northern Cross Route and Twenties Lane Roundabout is acknowledged; it is considered premature to rezone the subject lands at this stage. The appropriate approach is to continue with the sequential approach set out in the Development Plan, allowing the future scope of the LTSOA to be established through the preparation of the required studies and masterplan. This approach will ensure that future development is comprehensively planned, infrastructure-led and aligned with the long-term growth strategy for Drogheda

The Chief Executive is satisfied that the area identified through Variation No. 4 provides an appropriate basis for this future work and that the inclusion of additional lands is not warranted at this stage.

Accordingly, the Chief Executive does not consider it necessary to extend the settlement boundary or amend the extent of the proposed Long-Term Strategic Opportunity Area as part of Variation No. 4.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

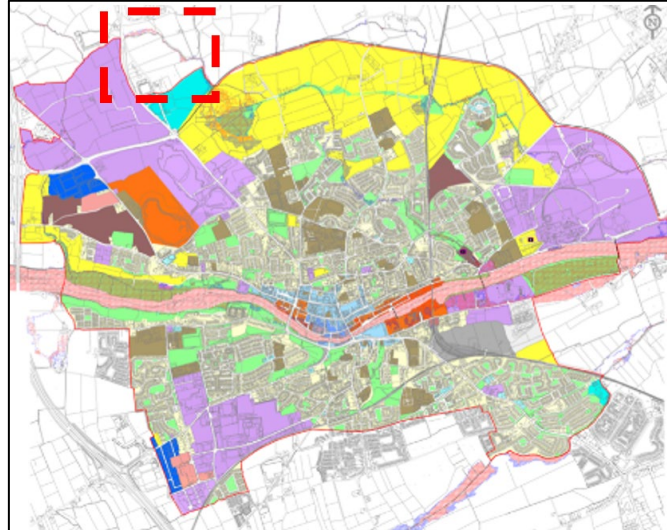
Submission Ref. No.

LH-C208-135

Submitted by:

James Carroll

Maps showing the location of the subject lands:



Map included within the submission
- subject lands outlined in red



Current zoning – subject lands
outlined in black

Summary of Main Issues Raised:

1. Introduction

The submission requests:

- An extension of the proposed North Drogheda Long-Term Strategic Opportunity Area westwards from Twenties Lane to the R132 to include the submitter's landholding.
- The rezoning of approximately 37 acres (c.15 ha) of lands currently zoned L1 Tourism and Leisure to A2 New Residential Phase 1.

2. Planning justification for Residential Zoning

Drogheda is a Regional Growth Centre and is allocated significant additional housing growth under Proposed Variation No. 4. The subject lands are suitable for residential zoning as they are located within the existing



Drogheda settlement boundary, adjoin the existing and expanding urban area, have access to existing infrastructure and services, are located close to existing public transport routes, benefit from good connectivity to the Port Access Northern Cross Route, R132 and M1, are available for development and can facilitate compact and sequential growth.

3. Proposed site-specific objective

An objective in relation to the lands is provided.

4. Long-Term Strategic Opportunity Area

The concept of the Long-Term Strategic Opportunity Area is supported but the boundary should extend further west to the R132. It is suggested that excluding the lands would create an artificial boundary and omit lands that are strategically connected to existing transport infrastructure and services.

Chief Executive's Response:

Drogheda has experienced significant population growth and a high level of house building activity, particularly in the northern environs in recent years. This trend underscores the town's role as a Regional Growth Centre and highlights the need for a strategic, long-term approach to future development.

The purpose of identifying the Long-Term Strategic Opportunity Areas (LTSOAs) is to provide a clear direction for the future growth of Drogheda and Dundalk and to assist in informing long-term infrastructure planning and investment decisions. As part of the transition to a 10-year Development Plan cycle, it is important that future development areas are identified to inform infrastructure investment and facilitate the coordinated delivery of enabling infrastructure.

It should be noted that the extent of the LTSOA identified under Variation No. 4 is indicative only and remains subject to further assessment and refinement. The study area may expand as additional evidence becomes available through future planning, infrastructure and transport studies. In this regard, consideration may be given to the inclusion of the subject lands within any future review of the LTSOA study area.

The proposed Variation requires the preparation of comprehensive studies and a masterplan to guide the future development of the LTSOA. This plan-led approach will ensure that future growth is coordinated with the provision of infrastructure and services and avoids fragmented development.

While the ambition to address future housing needs is acknowledged, it is considered premature to rezone the subject lands at this stage. The appropriate course is to continue with the sequential approach set out in the Development Plan, allowing the future scope of the LTSOA and associated infrastructure requirements to be established through the preparation of the required studies and masterplan. This approach will ensure that future development is comprehensively planned, infrastructure-led and aligned with the long-term growth strategy for Drogheda.

Chief Executive's Recommendation:

No change.

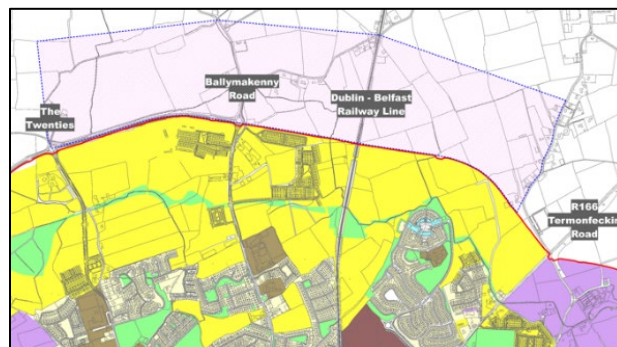
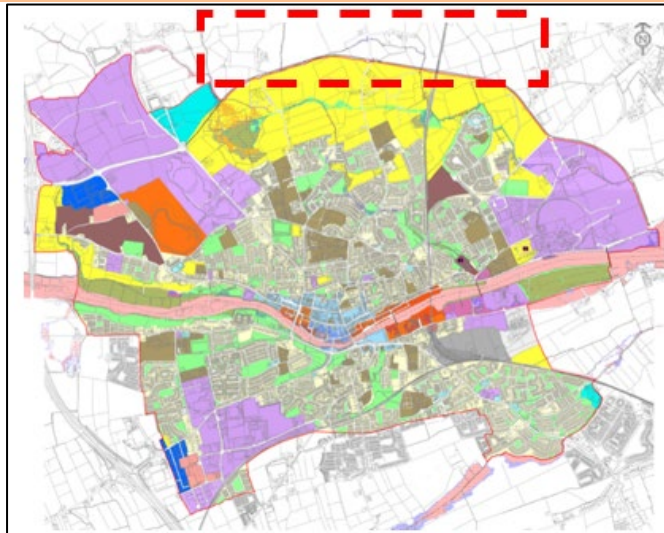
Submission Ref. No:

LH-C208-137

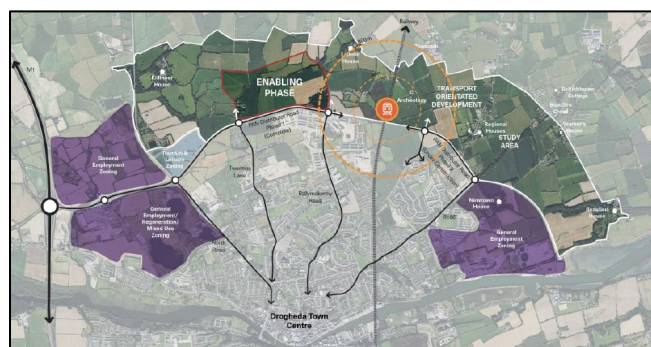
Submitted By:

Stephen Little & Associates on behalf of
Castlethorn

Maps showing the location of the subject lands:



Indicative Long Term Strategic Opportunity Area



Map included with the submission: Lands outlined in white indicate area for Urban Area Plan/Urban Development Zone and lands in red indicate 'Enabling Phase'.



Summary of Main Issues Raised:

The submission requests that the Council expand the area within Drogheda North identified as a Long-Term Strategic Opportunity Area and commit to the preparation of an Urban Area Plan (UAP) or Urban Development Zone (UDZ) Planning Scheme for these lands, identify an initial sequential phase(s) within these lands as an early 'Enabling Phase' and expand the scope of the proposed Variation beyond the lifetime of the current Development Plan.

The submitter states that the lands are strategically positioned to deliver housing in a sequential manner in proximity to existing and emerging railway and other physical and social infrastructure, consistent with the principles of compact growth. It is noted that a previous submission in respect of these lands has been made in response to LCC's Call for Sites and in response to the RSES Strategic Issues Paper Consultation.

Chief Executive Response:

The submission is noted. Drogheda has experienced significant population growth and a high level of house building activity, particularly to the north of the town in recent years. The contribution of Castlethorn as part of a consortium in partnership with Louth County Council in delivering Phase 1 of the Port Access Northern Cross Route is acknowledged. The current level of development activity in Drogheda underscores the town's role as a key Regional Growth Centre (RGC) and highlights the need for a strategic, long-term approach to future development.

The purpose of identifying the Long-Term Strategic Opportunity Areas (LTSOAs) is to provide a clear direction for future growth in Dundalk and Drogheda and to assist in informing long-term infrastructure planning and investment decisions. In the context of the transition to a ten-year Development Plan cycle, it is important, in consultation with infrastructure providers, to identify future growth areas that can inform the timely delivery of the infrastructure required to support their future development.

While the extent of the LTSOA identified is indicative and subject to refinement through future detailed assessment, the Chief Executive considers that it would be premature at this time to extend the LTSOA to broaden the extent of the LTSOA beyond that currently set out.

The request to consider rezoning the 'Enabling Phase' of lands identified in this submission as part of subsequent Variations to the Development Plan is noted. Any decisions relating to potential future Variations to the County Development Plan will be considered separately to this process.

The submitter also seeks a commitment from the Council to prepare a UAP or UDZ Planning Scheme for the Drogheda North lands. While such a planning framework may ultimately be appropriate for lands identified within the LTSOA, the Chief Executive considers it premature to commit to a specific statutory planning process at this stage. The current Development Plan and Variation No. 4 establish an evidence-based framework for the future consideration of these lands. Notwithstanding this the Council remain fully committed to delivering a joint plan for the sustainable and coordinated development of the town in partnership with Meath County Council.

Chief Executive Recommendation:

No change.



2.3.4 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Self-Sustaining Growth Towns - Ardee

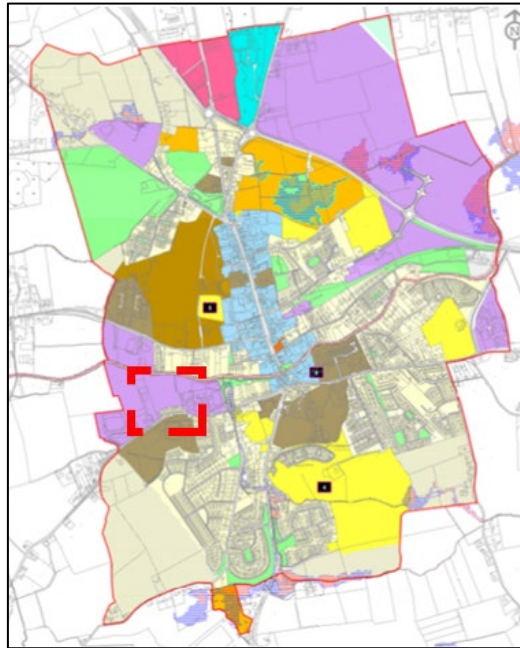
Submission Ref. No.

LH-C208-17

Submitted by:

Genesis Planning on behalf of Rosemount Homes
and Arabtec Capital Group

Maps showing the location of the subject lands:



Map included within submission
– subject lands outlined in red



Current zoning – subject lands
outlined in red

Summary of Main Issues Raised:

Background:

The 2.6ha site is located on John Street and the submission requests rezoning from E1 General Employment to A2 Residential Phase 1. The site has the potential to accommodate 66 residential units, a creche, public park/open space and community facilities. The rezoning of the site will also improve permeability of the area.



National and Local Planning Context:

Objectives from revised National Planning Framework are outlined, as well as population growth trends and housing completions (CSO). Analysis of housing Delivery in the County Louth has identified shortfall in County Louth as a whole and in Ardee.

Planning Context Proposed Variation No. 4

Under the Settlement Capacity Audit, the site was discounted at Stage 1 on the basis that 'Land is required for other Use'. It is contested that:

- The site is surrounded by residential development and a school, making employment uses less suitable.
- It lacks direct access to strategic employment infrastructure.
- No employment development interest has emerged on the site for over 10 years.
- Ardee already has sufficient employment-zoned lands elsewhere.
- Economic trends favour service-based and remote-working sectors rather than industrial lands.

Under the proposed Variation the quantum of residentially zoned land in Ardee has increased from 35.9 to 46.5 hectares however only 24.3% of Ardee's housing target has been delivered and having regard to the Development Plan Guidelines and the Sustainable Residential Development and Compact Settlement Guidelines, 542 additional residential units are required.

Site Assessment: The site is within walking distance of Ardee town centre, adjacent to existing housing and schools, with access to roads, footpaths and services, there are no flood-risk constraints, there is capacity for water, wastewater and utilities and, the site would offer a sequential approach to the growth of the town. Details are also provided regarding community facilities in the vicinity.

Layout: Details are provided regarding the layout of the proposed development and the type of housing that could be developed on the site.

Appendix: Pre-connection enquiry with Irish Water submitted.



Chief Executive's Response:

As part of proposed Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1–4 settlements and to identify sites capable of contributing towards housing delivery. Two Call for Sites submissions (Nos. 4 and 95) were received in respect of the lands the subject of this submission. A number of sites in Ardee including the subject lands, were assessed as part of this audit, with the site identified as Site 7 in the Settlement Capacity Audit.

The site was evaluated through both a desktop assessment and a detailed site inspection. While there are small pockets of existing A1 Residential land in the vicinity, the subject lands are largely surrounded by lands currently in employment use or zoned for employment purposes. It is considered that the site should remain zoned for employment use for the following reasons:

- To avoid the fragmentation of employment lands and facilitate their comprehensive and coordinated development to the west of Ardee.
- To avoid prejudicing the future development and operation of adjoining employment lands by introducing residential uses that could give rise to amenity and land-use compatibility issues.
- To support the provision of employment opportunities in various locations throughout Ardee, thereby contributing to the creation of a sustainable residential community and promoting the principles of the '10-minute neighbourhood', where a range of services, employment opportunities and amenities are available within walking distance.

Having regard to the above assessment, it was concluded that other lands within Ardee are better suited to accommodate residential development, having regard to their location, accessibility, serviceability, and consistency with the Core Strategy and settlement growth objectives.

Chief Executive's Recommendation:

No change.

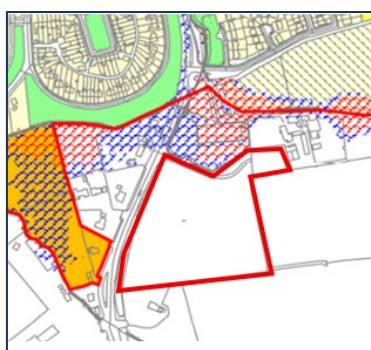
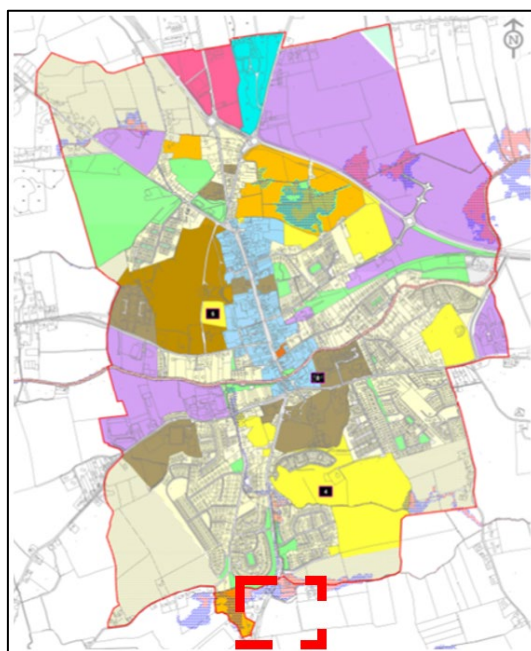
Submission Ref. No.

LH-C208-22

Submitted by:

V P Mathews Developments Limited

Maps showing the location of subject the lands:



Current zoning (lands outside the settlement boundary) – subject lands outlined in red

Summary of Main Issues Raised:

The submission seeks the inclusion of approximately 3.89ha of land at Mullameelan, Ardee, within proposed Variation No. 4 for residential development. It is submitted that the lands represent a deliverable residential opportunity capable of contributing towards the increased housing targets arising from the Revised National Planning Framework. The submission highlights that the lands are in single ownership, are controlled by an established residential developer with a proven track record of housing delivery and are capable of being brought forward within the lifetime of the County Development Plan. It is further submitted that the site benefits from access to existing infrastructure, proximity to local services and that the lands represent a sustainable location for residential development.



Chief Executive's Response:

The submission is noted. The lands subject to this submission were identified and assessed as Site 11 in the Settlement Capacity Audit, which formed part of the evidence base underpinning proposed Variation No. 4. The purpose of the audit was to assess the suitability and capacity of available lands to accommodate future growth and to inform zoning and land-use decisions within the settlement.

In considering Site 11, regard was given to its location relative to the existing built-up area of Ardee and its potential contribution to the planned growth of the settlement. The assessment concluded that, while the site has a degree of accessibility to local services and amenities, its development for residential purposes would be less aligned with the objectives of compact growth and the consolidation of the existing settlement pattern than other available lands. While the submission highlights the site's accessibility and proximity to services, the Chief Executive remains satisfied that the site does not represent the most appropriate location for residential expansion at this time.

The Chief Executive also considered the availability of alternative and more suitable lands capable of contributing towards the revising housing allocation requirements for Ardee. Variation No. 4 purpose is to identify sufficient lands to meet the revised housing requirements in a manner that better supports the consolidation of the existing built form of Ardee and the achievement of compact growth. Given the location of the subject lands on the periphery of Ardee, at a considerable distance from the town centre and existing services, it is not considered appropriate that these lands be rezoned for residential development. The issues raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

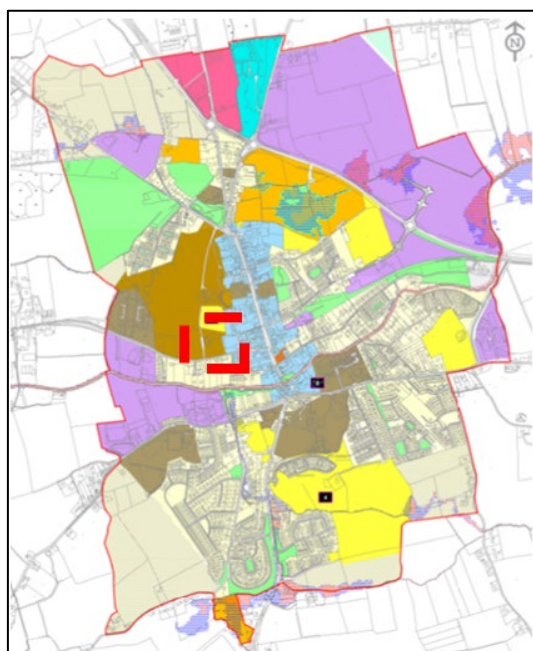
Submission Ref. No.

LH-C208-27

Submitted by:

Ewan Heaphy

Maps showing the location of the subject lands:



Map included within submission
– subject lands outlined in red



Current zoning – subject
lands outlined in red

Summary of Main Issues Raised:

The submission seeks the rezoning of the lands known as the ‘Santa Barbara’ site in Ardee from G2 Institutional to either D1 Regeneration or B1 Town or Village Centre. It is submitted that the current G2 Institutional zoning is restrictive and no longer reflects the characteristics of the site or its strategic location.

The submission states that the lands are underutilised, contain a vacant and derelict building and represent a regeneration opportunity within the urban area of Ardee. It is argued that the site benefits from established infrastructure and access arrangements and is well positioned to support town centre expansion, regeneration and compact growth. The submission further contends that the existing zoning prevents investment and



redevelopment of the lands and that rezoning would support the revitalisation of the area, align with Town Centre First principles and assist in addressing perceived retail and commercial deficits within Ardee.

Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges the underutilised nature of the subject lands and the benefits that may arise from the redevelopment of vacant or underutilised sites within Ardee. The proximity of the lands to Ardee, Main Street are also acknowledged.

The existing two storey property on the site is a Protected Structure (ref LHS017-074). Any amendment to the land use zoning in this location would require an assessment of the potential impacts on the character and setting of the Protected Structure.

The focus of this submission is to request a re-zoning of the lands for to either B1 Town or Village Centre or D1 Regeneration.

The purpose of this Variation is to ensure the consistency of the County Development Plan with the NPF Implementation – Housing Growth Requirements and that there are sufficient residential lands available to meet the additional housing requirements allocated to Louth in these Guidelines. It is considered that an analysis of the requirement for additional commercial uses would be outside the scope of this Variation but would be more appropriate to form part of a Development Plan review.

Chief Executive's Recommendation:

No change.

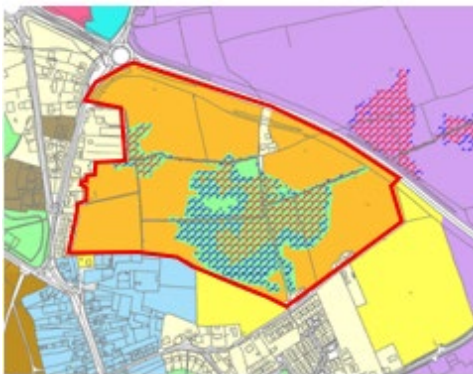
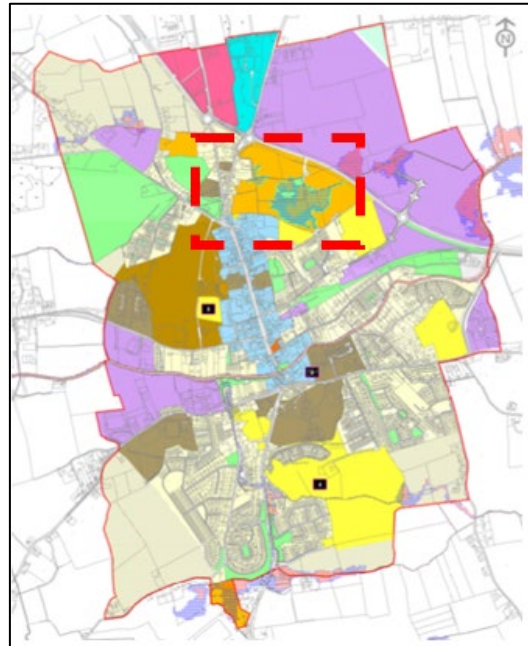
Submission Ref. No.

LH-C208-57

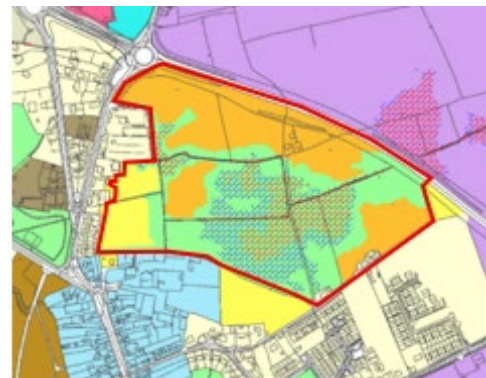
Submitted by:

Planning Solutions

Maps showing the location of the subject lands:



Current zoning



Proposed zoning

Summary of Main Issues Raised:

The submission relates to the lands at Cappocksgate, Ardee and seeks the rezoning of the entire landholding from H1 Open Space, A2 New Residential Phase 1 and A3 New Residential Phase 2 to C1 Mixed Use.

It is submitted that the existing zoning fragments the site and restricts its development potential. The submission contends that Cappocksgate represents the most suitable location for the future expansion of Ardee and should be developed as a mixed-use urban extension incorporating residential, retail, commercial, civic, hospitality and recreational uses. The submission further states that the H1 Open Space zoning is unnecessarily restrictive and that surface water and flood management issues can be addressed through engineered drainage



and attenuation measures. The submission includes an indicative masterplan and requests that the entire site be rezoned to C1 Mixed Use to facilitate the comprehensive development of the lands.

Chief Executive's Response:

The submission is noted. The lands subject to this submission were assessed as part of the Settlement Capacity Audit undertaken in support of Variation No. 4 and are identified as Site 3 in Ardee. The Settlement Capacity Audit forms part of the evidence base underpinning Variation No. 4 and informed the determination of the settlement's growth strategy, development framework and associated land use zoning provisions. The assessment concluded that a portion of the existing A3 New Residential Phase 2 lands should be rezoned to A2 New Residential Phase 1 having regard to the location of the site and its contribution towards the consolidation of development and compact growth in Ardee.

H1 Open Space Zoning

The reason for the extent of the H1 Open Space zoning beyond the extents of Flood Zone A and B is due to an analysis of Future Climate risk from flooding undertaken as part of the Strategic Flood Risk Assessment. The subject lands proposed to be zoned open space and outside of Flood Zones A and B were identified at flood risk by the Mid-Range and High-End future climate scenario. In order to avoid the potential for these lands to be developed for residential use it was decided to zone them as open space.

Having considered the arguments advanced in the submission relating to the flood extents and the proposed H1 Open Space zoning, together with further analysis undertaken by the Planning Authority, the Chief Executive acknowledges that the focus of the Future Climate Area Scenario should only be included on lands that are subject to a proposed amendment under Variation No. 4 to the County Development Plan. In this context this mapping should only apply to the western portion of Site ARD 3 where it is proposed to amend the zoning of 1.39ha of Phase 2 lands to A2 New Residential Phase 1.

It is therefore recommended that the proposed H1 Open Space lands on the A3 New Residential Phase 2 lands relating to the Future Climate Area Scenario Mapping is removed. Should these lands be proposed to be brought forward for development in future plans/variations this issue can be re-visited. The H1 Open Space lands on the proposed A2 New Residential Phase 1 lands will also be recommended to change to A2 New Residential Phase 1 with a spot objective included on the lands requiring any development identified as being at risk under the future climate scenario mapping limited to less vulnerable uses.

Request to re-zone the lands to Mixed Use

The submission seeks the rezoning of the entire site to C1 Mixed Use. The Chief Executive does not accept this recommendation. The lands were assessed through the Settlement Capacity Audit and were identified as making an important contribution towards meeting the revised housing growth requirements for the settlement. The Chief Executive remains satisfied that the residential zoning represents the most appropriate primary land use for the site.

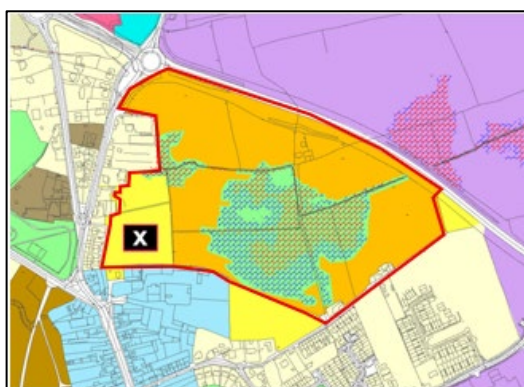
While the Planning Authority acknowledges the potential for a range of supporting uses to be incorporated into future development proposals at Cappocksgate, it is not considered appropriate to rezone the entirety of the lands to C1 Mixed Use. As set out above, the lands have been identified through the Settlement Capacity Audit as making an important contribution towards meeting the settlement's housing growth requirements, while portions of the site are also subject to flood risk constraints identified through the Strategic Flood Risk Assessment. The proposed zoning already provides for the future residential expansion of Ardee while ensuring that flood risk considerations are appropriately addressed.

Having regard to the foregoing, the Chief Executive remains satisfied that the proposed zoning appropriately balances housing delivery, compact growth, flood risk management and the proper planning and sustainable development of the area.

The issues raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

1. Remove the H1 Open Space Zoning on the areas within the mid-high range Future Climate Scenario Flood Risk Area within the A3 New Residential Phase 2 lands and change this zoning back to A3 New Residential Phase 2 (see map below)
2. Remove the H1 Open Space Zoning on the areas within the mid-high range Future Climate Scenario Flood Risk Area within the A2 New Residential Phase 1 lands and change this zoning to A2 New Residential Phase 1 (see map below)



3. Insert a Spot Objective relating to the lands proposed to be zoned A2 New Residential Phase 1 into Table 13.2, Chapter 13 of the LCDP 2021-2027 (as varied) stating the following:

Spot Objective	Settlement	Location	Objective
xx	Ardee	lands north of Irish Street and east of the N2	This site has lands identified as being at risk under future climate scenarios, (see Appendix I of the SFRA Addendum). Any new uses at these at-risk lands will generally be limited to less vulnerable uses. This limitation shall take primacy over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan's flood risk management and drainage provisions.

4. Update paragraph 3 in Section 2.2 of the SFRA Report as follows:

"Parts of ~~two~~ **three** Proposed Variation sites are identified as being at risk by OPW Future Climate Risk Scenario Area Mapping:

- Ardee Site 3 has overlaps with Mid-Range and High-End Future Climate Scenario Flood Risk Areas (see map in Appendix I). The following text has been integrated into the Variation for this site in order to significantly limit future development:

“This site has lands identified as being at risk under future climate scenarios, (see Appendix I of the SFRA Addendum). Any new uses at these at-risk lands will generally be limited to less vulnerable uses. This limitation shall take primacy over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan’s flood risk management and drainage provisions.”

5. Insert the following map into Appendix I of the SFRA Report

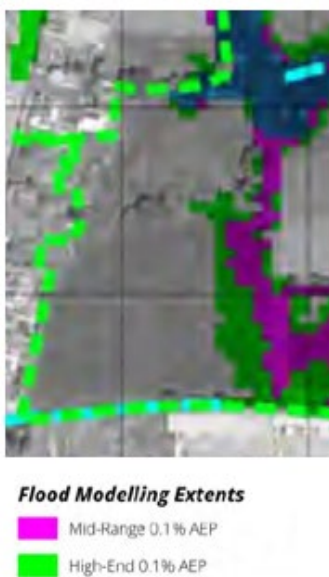


Figure 3 Ardee Site 3 and overlaps with Mid-Range and High-End Future Climate Scenario Flood Risk Areas

6. Insert the into the proposed table recommended to be inserted into section 10.3.3 ‘Future Climate Risk Scenario Areas’ in Chapter 10 ‘Utilities’ of Volume 1 of the County Development Plan 2021-2027 (as varied) (recommended to be inserted under submission LH-C208-123 by the OPR and submission LH-C208-69 by the OPW):

Settlement and location	Any future development shall comply with the following requirement
Ardee – lands north of Irish Street and east of the N2	This site has lands identified as being at risk under future climate scenarios, (see section 2.2 of the SFRA Report in Appendix 2 of the SFRA for the Louth County Development Plan 2021-2027 as varied). Any new uses at these at-risk lands will generally be limited to less vulnerable uses. This limitation shall take primacy over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan's flood risk management and drainage provisions.

Note that if this recommendation is agreed the quantum of lands zoned A2 New Residential Phase 1 and A3 New Residential Phase 2 in the Core Strategy Table and Settlement Capacity Audit will be required to be updated.

Note that the CE Recommendation to this submission LH-C208-57 is the same as the CE recommendation in response to submission LHC208-127 below.

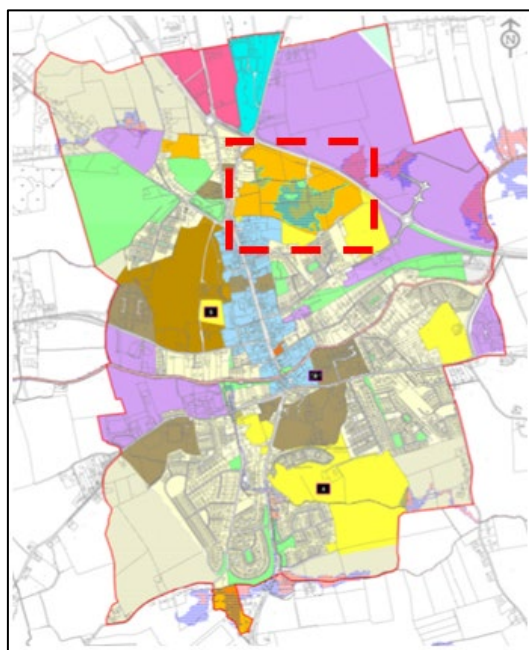
Submission Ref. No.

LH-C208-127

Submitted by:

JSA Planning on Behalf of LJW Properties.

Maps showing the location of the subject lands:

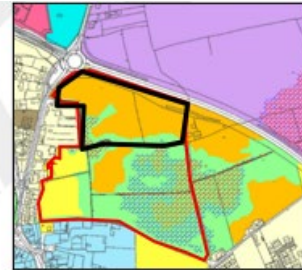




Map included within the submission - subject lands outlined in red



Current zoning – subject lands outlined in red



Proposed zoning – subject lands shaded black

Summary of Main Issues Raised:

Introduction

Lands at Ardee (identified as ARD 3 in the Settlement Capacity Audit) currently zoned A3 New Residential Phase 2 and H1 Open Space in the Louth County Development Plan 2021-2017 (as varied).

Under Variation No.4 it is proposed to rezone part of the site to A2 Phase 1 and to extend the H1 Open Space zoning. The rezoning of lands from A3 Phase 2 to A2 Phase 1 Residential, is welcomed.

Site Description

Site description is provided.

Rezoned additional Phase 1 Residential Lands

The submission requests that the proposed A2 Phase 1 zoning be extended to include the A3 lands located to the north of the proposed open space zoning.

Reduce the extent of the proposed H1 Open Space zoning to reflect current flood mapping

It is stated the extent of the proposed open space zoning exceeds the mapped flood extent and that the evidence base for the additional downzoning is unclear. The submission requests that the open space zoning be reverted to its current extent and that climate change flood mapping should inform development design at planning application stage rather than determine zoning boundaries. RPS have previously advised client on flood risk in relation to the lands and any future application will be subject to a comprehensive site-specific flood risk assessment.



Chief Executive's Response:

As part of Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and to identify sites capable of contributing towards housing delivery. Several sites were assessed in Ardee including lands identified as Site 3. The lands that are the subject of this submission form part of, but do not comprise the entirety of, the Phase 2 lands identified within Site 3.

The site was subject to both a desktop assessment and site inspection.

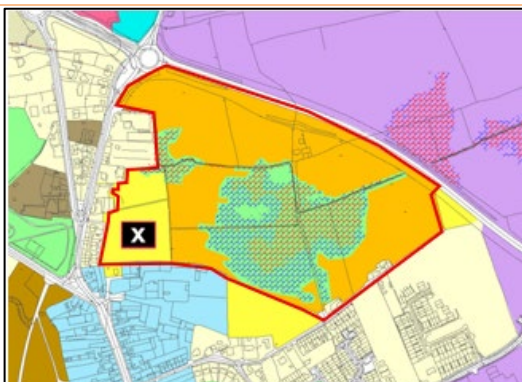
Having considered the arguments advanced in the submission relating to the flood extents and the proposed H1 Open Space zoning, together with further analysis undertaken by the Planning Authority, the Chief Executive acknowledges that the focus of the Future Climate Area Scenario should only be included on lands that are subject to a proposed amendment under Variation No. 4 to the County Development Plan. In this context this mapping should only apply to the western portion of Site ARD 3 where it is proposed to amend the zoning of 1.39ha of Phase 2 lands to A2 New Residential Phase 1.

The submission also requests that the proposed A2 Phase 1 zoning be extended to include the A3 lands located to the north of the H1 Open Space zoning. However, having given further consideration to the matters raised in the submission, the Chief Executive has concluded that an extension of the A2 Phase 1 zoning is not warranted at this time. In reaching this conclusion, regard was had to the access to these lands, taking account of the fact that the N33 is a National Road and a new access/intensification of any existing access onto same would not be facilitated having regard to Table 7.9 of the LCDP 2021-2027(as varied). In addition, the extent of land in the overall landholding at risk of flooding under the Mid to High Range OPW Future Climate Flooding Scenario Mapping would present challenges in designing a residential development on the overall landholding.

It is therefore recommended that the proposed H1 Open Space lands on the A3 New Residential Phase 2 lands relating to the Future Climate Area Scenario Mapping is removed. Should these lands be proposed to be brought forward for development in future plans/variations this issue can be re-visited. The H1 Open Space lands on the proposed A2 New Residential Phase 1 lands will also be recommended to change to A2 New Residential Phase 1 with a spot objective included on the lands requiring any development identified as being at risk under the future climate scenario mapping limited to less vulnerable uses.

Chief Executive's Recommendation:

1. Remove the H1 Open Space Zoning on the areas within the mid-high range Future Climate Scenario Flood Risk Area within the A3 New Residential Phase 2 lands and change this zoning back to A3 New Residential Phase 2 (see map below)
2. Remove the H1 Open Space Zoning on the areas within the mid-high range Future Climate Scenario Flood Risk Area within the A2 New Residential Phase 1 lands and change this zoning to A2 New Residential Phase 1 (see map below)



3. Insert a Spot Objective relating to the lands proposed to be zoned A2 New Residential Phase 1 into Table 13.2, Chapter 13 of the LCDP 2021-2027 (as varied) stating the following:

Spot Objective	Settlement	Location	Objective
xx	Ardee	lands north of Irish Street and east of the N2	This site has lands identified as being at risk under future climate scenarios, (see Appendix I of the SFRA Addendum). Any new uses at these at-risk lands will generally be limited to less vulnerable uses. This limitation shall take primacy over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan's flood risk management and drainage provisions.

4. Update paragraph 3 in Section 2.2 of the SFRA Report as follows:

"Parts of ~~two~~ **three** Proposed Variation sites are identified as being at risk by OPW Future Climate Risk Scenario Area Mapping:

- Ardee Site 3 has overlaps with Mid-Range and High-End Future Climate Scenario Flood Risk Areas (see map in Appendix I). The following text has been integrated into the Variation for this site in order to significantly limit future development:

"This site has lands identified as being at risk under future climate scenarios, (see Appendix I of the SFRA Addendum). Any new uses at these at-risk lands will generally be limited to less vulnerable uses. This limitation shall take primacy over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan's flood risk management and drainage provisions."

5. Insert the following map into Appendix I of the SFRA Report

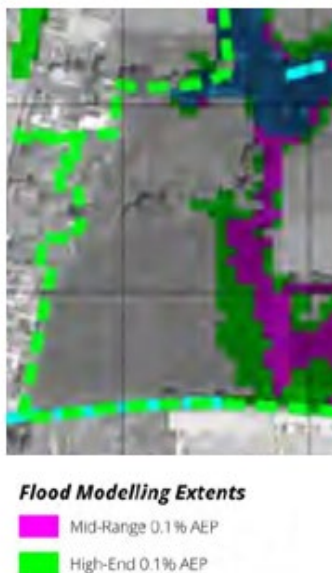


Figure 3 Ardee Site 3 and overlaps with Mid-Range and High-End Future Climate Scenario Flood Risk Areas

6. Insert the into the proposed table recommended to be inserted into section 10.3.3 'Future Climate Risk Scenario Areas' in Chapter 10 'Utilities' of Volume 1 of the County Development Plan 2021-2027 (as varied) (recommended to be inserted under submission LH-C208-123 by the OPR and submission LH-C208-69 by the OPW):

Settlement and location	Any future development shall comply with the following requirement
Ardee – lands north of Irish Street and east of the N2	This site has lands identified as being at risk under future climate scenarios, (see section 2.2 of the SFRA Report in Appendix 2 of the SFRA for the Louth County Development Plan 2021-2027 as varied). Any new uses at these at-risk lands will generally be limited to less vulnerable uses. This limitation shall take primacy over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan's flood risk management and drainage provisions.

Note that if this recommendation is agreed the quantum of lands zoned A2 New Residential Phase 1 and A3 New Residential Phase 2 in the Core Strategy Table and Settlement Capacity Audit will be required to be updated.

Note that the CE Recommendation to this submission LH-C208-127 is the same as the CE recommendation in response to submission LHC208-57 above.

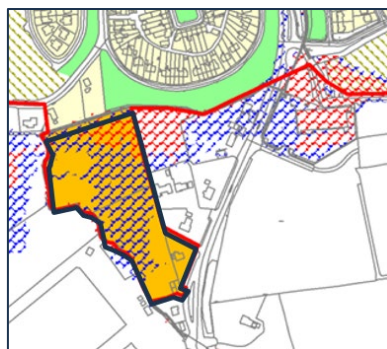
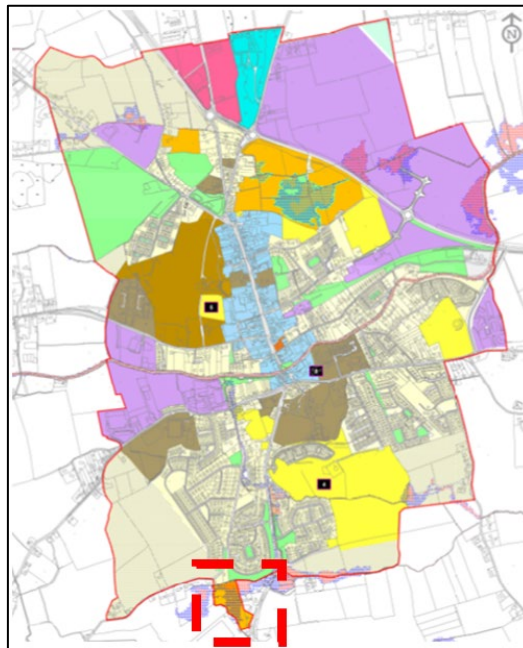
Submission Ref. No.

LH-C208-76

Submitted by:

Frank Lynch

Maps showing the location of the subject lands:



Current zoning – subject lands outlined in black

Summary of Main Issues Raised:

The submission seeks the inclusion of lands at Mullameelan, Ardee within Variation No. 4 for residential development. It is submitted that the lands represent a suitable and available residential development opportunity capable of contributing towards the revised housing growth requirements for Ardee. The submission contends that the lands are located adjacent to the existing built-up area of the town, are in single ownership, are available for development and are capable of being serviced. It is further submitted that the lands represent an appropriate location for residential expansion and should be rezoned to facilitate housing delivery.



Chief Executive's Response:

The submission is noted. The subject lands were identified and assessed as Site 10 in the Settlement Capacity Audit, which formed part of the evidence base underpinning Variation No. 4. The purpose of the Settlement Capacity Audit was to assess the suitability, availability and deliverability of lands capable of contributing towards the revised housing growth requirements arising from the and associated Section 28 Guidelines.

Having regard to the findings of the Settlement Capacity Audit, the lands were not identified as being the most suitable lands to accommodate the future housing growth requirements for Ardee.

A principal constraint affecting the site relates to flood risk. The Settlement Capacity Audit identified that the majority of the lands are located within Flood Zones A and B, with flood risk affecting a significant proportion of the site. A stream also runs along the northern and western boundaries of the lands. Having regard to the extent of flood risk identified, the Chief Executive considered this to be a significant constraint to the development of the site.

The assessment also considered the location of the lands within the settlement. The site is located approximately 980 metres from the town centre zoned lands and, having regard to its peripheral location relative to the existing urban settlement pattern of Ardee, the Chief Executive is not satisfied that the lands would make the same contribution to compact growth and the consolidation of development within the settlement as other sites identified through the Settlement Capacity Audit.

While the submission promotes the lands as a suitable residential opportunity, the Settlement Capacity Audit identified a number of alternative sites which were considered more suitable having regard to flood risk, accessibility, compact growth and their ability to support the consolidation of the existing built form of Ardee. Variation No. 4 has identified sufficient lands to accommodate the revised housing allocation for Ardee, and the Chief Executive remains satisfied that the lands identified through the Settlement Capacity Audit represent the most appropriate locations to accommodate future residential growth within the settlement.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

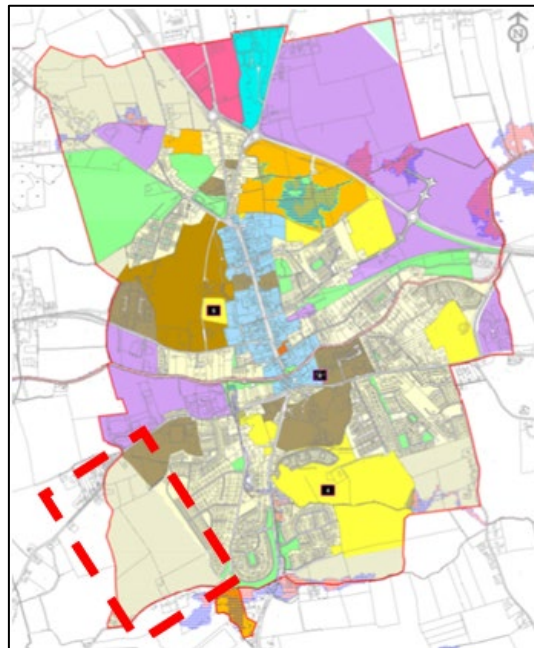
Submission Ref. No.

LH-C208-102

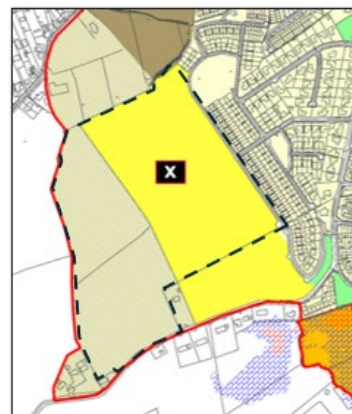
Submitted by:

Seamus Rogers

Maps showing location of subject lands:



Map included within the submission – subject lands outlined in red



Proposed zoning – subject lands outlined in dashed black

Summary of Main Issues Raised:

The submission seeks the rezoning of the entirety of the lands at Currabeg, Ardee rather than the partial rezoning (Site 6a and 6b) proposed under Variation No. 4.

It is submitted that the lands should be considered as a single land bank and that all landowners should have the opportunity to participate in the delivery of a coordinated development. The submission states that the



lands can be developed cohesively, that the necessary infrastructure can be delivered and that significant joint investment has already been made with infrastructure.

The submission further contends that the lands represent a logical extension of the existing settlement, would support compact growth and would maximise the use of existing and planned infrastructure. Concerns are also raised that the rezoning of only part of the overall landholding could result in fragmented development and limit the ability to deliver housing in a coordinated manner.

Chief Executive's Response:

The submission is noted. The subject lands were assessed through the Settlement Capacity Audit undertaken in support of Variation No. 4. Following assessment, Site 6a and Site 6b were identified as suitable for residential development having regard to their suitability, availability and deliverability and are proposed for rezoning under Variation No. 4. Together, these sites provide an estimated residential capacity of approximately 207 units and contribute towards meeting the revised housing requirements for Ardee.

The Chief Executive accepts that the additional land referenced in the submission could accommodate residential development in the future. However, the purpose of Variation No. 4 is to identify the most suitable lands required to accommodate the revised housing growth requirements arising from the National Planning Framework - First Revision (2025) and associated Section 28 Guidelines during the lifetime of the current Development Plan.

In this regard, the Settlement Capacity Audit identified sufficient residential development capacity, and it is not considered necessary to rezone additional lands beyond those already identified. While the submission contends that the entirety of the landholding should be rezoned as a single land bank, the Chief Executive remains satisfied that the extent of lands proposed for rezoning is sufficient to meet the housing requirements of the settlement at this time.

The Chief Executive acknowledges that the remaining lands may have a future role to play in the longer-term residential growth of Ardee. However, having regard to the findings of the Settlement Capacity Audit, the rezoning of additional lands is not required at this time. The rezoning of these additional lands can be considered as part of a future review of the County Development Plan.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.



2.3.5 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Self-Sustaining Growth Towns – Dunleer

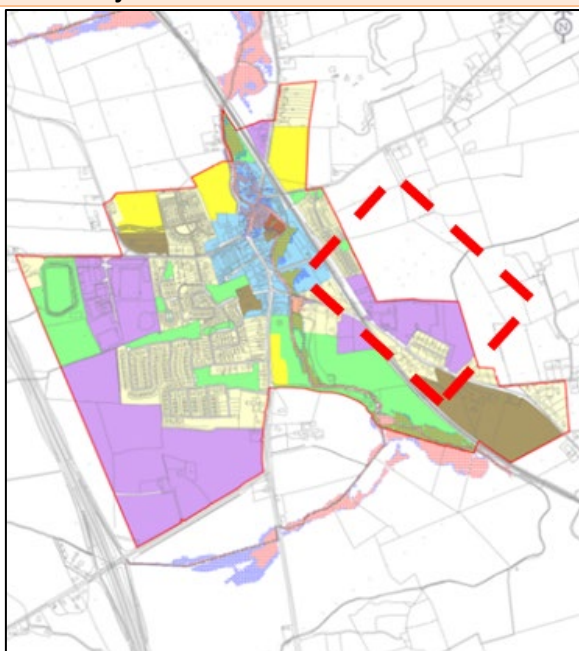
Submission Ref. No.

LH-C208-49

Submitted by:

CBRE Advisory (IRL) Ltd on behalf of Glen
Dimplex Ireland

Maps indicating the location of the subject lands:



Current zoning – subject lands outlined in red



Proposed zoning – subject lands outlined in red

Summary of Main Issues Raised:

The submission expresses support for the proposed rezoning of lands identified as Site 3 in the Settlement Capacity Audit at Barn Road, Dunleer, from E1 General Employment and rural lands to C1 Mixed Use. The submission also supports the proposed requirement for the preparation of a comprehensive Masterplan for the site.

Chief Executive's Response:

The submission is noted. The Chief Executive considers that the proposed mixed-use zoning and associated masterplan requirement will facilitate the coordinated and sustainable development of the lands to support the future growth of Dunleer.

The contents of the submission does not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

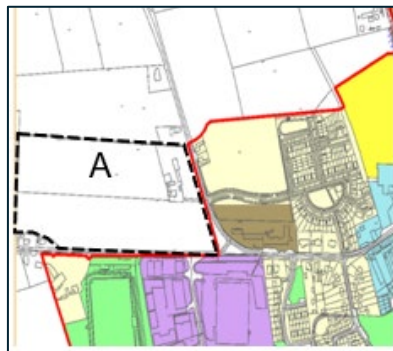
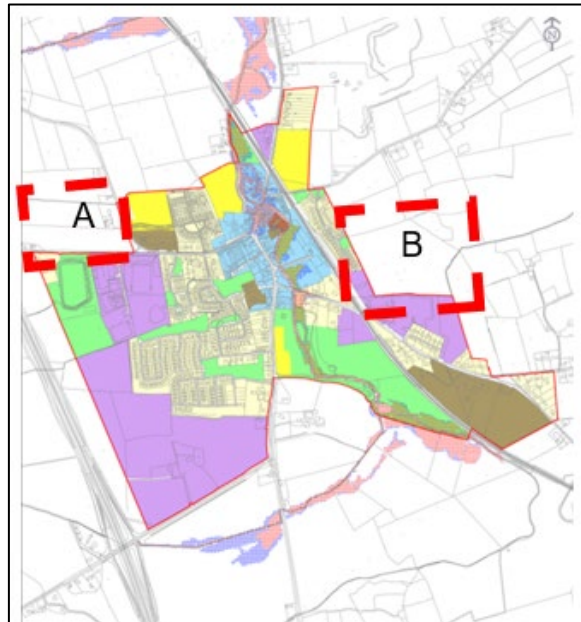
Submission Ref. No.

LH-C208-72

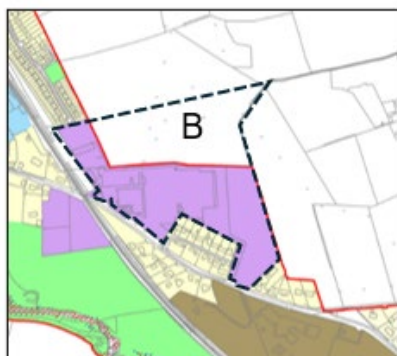
Submitted by:

Stephen Ward Town Planning and Development
Consultants on behalf of Michael Gregory

Maps showing the location of the subject lands:



Current zoning – subject lands outlined in dashed black (no change proposed)



Current zoning – subject lands outlined in dashed black



Proposed zoning – subject lands outlined in dashed black

Summary of Main Issues Raised:

The submission claims that Proposed Variation No. 4 does not provide an appropriate distribution of residentially zoned lands across the County and is inconsistent with the core strategy, settlement strategy and national planning policy. It is submitted that the proposed variation disproportionately increases residential land supply in a number of lower-tier settlements while failing to provide a sufficient increase in lands capable of accommodating future growth.

The submission states that Dunleer has not received a commensurate increase in residentially zoned land relative to its role within the settlement hierarchy and contends that the settlement is being constrained from achieving its growth potential. It is argued that the extent of lands zoned A2 New Residential Phase 1 within Dunleer has reduced under Variation No. 4 and that insufficient additional residential lands have been identified to support future population growth and housing delivery.

The submission further claims that the existing A2 New Residential Phase 1 lands within Dunleer already benefit from planning permission and that no additional residential lands have been identified to provide flexibility and choice should these sites not come forward for development.

The submission also raises concerns regarding the lands proposed to be rezoned C1 Mixed Use within Dunleer. These lands are subject to a masterplan requirement and may not contribute to housing delivery within the short to medium term. The submission argues that additional residentially zoned lands are required.

The submission further requests that land at Ravel, Dunleer are rezoned to A2 New Residential Phase 1 zoning. It is submitted that the lands are available for development, adjacent to the existing built-up area of the settlement and are well-related to schools, employment, community facilities, public transport and existing infrastructure.

Chief Executive's Response:

The submission is noted. It contends that the extent of lands zoned A2 New Residential Phase 1 in Dunleer has reduced under Proposed Variation No. 4 and that this demonstrates an insufficient provision of residential land within the settlement. However, the reduction in A2-zoned lands arises from the rezoning of completed or substantially developed residential lands from A2 New Residential Phase 1 to A1 Existing Residential in order to provide an accurate reflection of development that has taken place within the settlement. This should not be interpreted as a reduction in the residential development capacity of Dunleer.



The Chief Executive notes that the revised housing allocation for Dunleer has increased from 146 units to 216 units, representing an additional housing requirement of 70 units. The Settlement Capacity Audit identified approximately 12 hectares of residentially zoned land within Dunleer and noted that planning permission has been granted or is under consideration for 336 residential units on approximately 11 hectares of these lands.

The Chief Executive therefore does not accept the assertion that Dunleer lacks sufficient residential development capacity. On the contrary, the Settlement Capacity Audit demonstrates that the settlement already possesses a substantial quantum of residentially zoned land with planning permissions and active proposals capable of delivering housing.

The submission also claims that existing A2 New Residential Phase 1 lands already benefit from planning permission and that additional lands should be identified to provide flexibility should these sites not be delivered. The Chief Executive has considered this matter. However, the existence of planning permission does not remove the contribution of these lands to the available housing supply. It demonstrates that the lands are available, developable and capable of contributing towards housing delivery during the lifetime of the County Development Plan.

The submission further contends that the Site 3 lands proposed to be rezoned C1 Mixed Use in Dunleer are subject to a Masterplan requirement and may not contribute to housing delivery within the short to medium term. The Chief Executive does not accept this position. The intent of the masterplan requirement is to facilitate the coordinated and sustainable development of lands and to provide an appropriate framework for the delivery of housing, employment and supporting infrastructure on this particular site.

The Chief Executive further notes that Dunleer Site 3, which is proposed to be rezoned to C1 Mixed Use, extends to approximately 10.9 hectares and was assessed through the Settlement Capacity Audit as having the potential to accommodate approximately 90 residential units in addition to other supporting uses. The site achieved a Stage 2 assessment score of 50 out of 55 and was identified as the most appropriate site to accommodate additional growth within the settlement. It is also noted that the landowner of Site 3 engaged in the Call for Sites process and subsequently made Submission No. 49 in support of the proposed zoning and masterplan framework under Variation No. 4. These demonstrate landowner support for the proposed zonings, site availability and a clear intention to bring the lands forward for development.

The Chief Executive is satisfied that sufficient capacity and flexibility exist within the settlement to accommodate the revised housing growth requirements and additional residential lands is not required at this time. Having regard to the peripheral location of the Ravel lands and the findings of the Settlement Capacity Audit which indicate that there are more appropriate lands available to accommodate the revised housing allocation, the rezoning of the subject lands is not required at this time. The lands can be reconsidered as part of a future review of the County Development Plan.

Chief Executive's Recommendation:

No change.

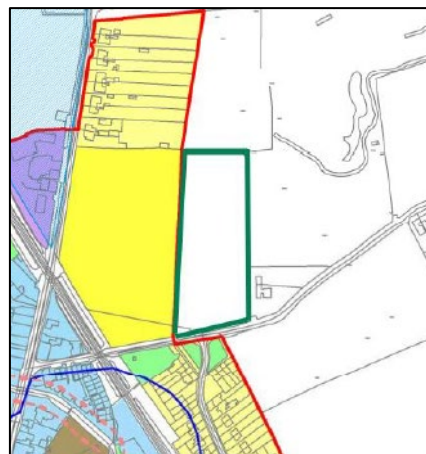
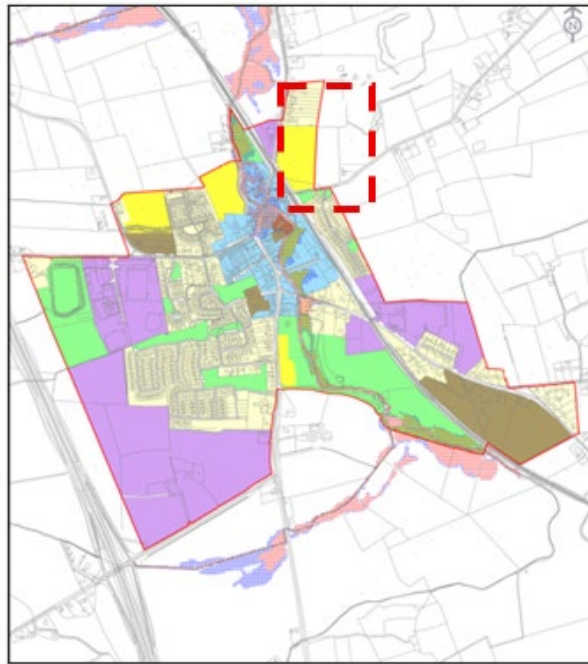
Submission Ref. No.

LH-C208-82

Submitted by:

Brady Hughes Consulting on behalf of Eugene Matthews

Maps showing the location of the subject lands:



Current zoning – subject lands outlined in green

Summary of Main Issues Raised:

The submission seeks the inclusion of approximately 1.86ha of land at Mountain View Road, Dunleer. The submission contends that the subject lands were not appropriately assessed as part of the Settlement Capacity Audit and that they should have been considered separately from the wider lands identified as Site 2. It is submitted that the lands directly adjoin an existing residentially zoned site which benefits from planning



permission for 84 dwellings and that the approved layout was designed to facilitate a future extension onto the subject lands.

The submission further contends that the subject lands benefit from a high degree of serviceability and deliverability arising from the permitted residential development on adjoining lands, including proposed roads, services and infrastructure connections. It is argued that the lands represent a logical and sequential extension to the settlement and would contribute to compact growth and housing delivery in the short term.

The submission also states that Dunleer has underperformed in terms of housing delivery and population growth and argues that additional residential lands are required to provide flexibility and ensure that the revised housing growth requirements can be met. It is contended that the proposed zoning would provide an opportunity for immediate housing delivery on lands in the ownership of a landowner with a proven track record of bringing residential lands forward for development.

Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges the information submitted regarding the location of the lands, the adjoining permitted residential development and the potential for future servicing and access connections arising from that development. However, the Chief Executive does not accept the contention that the subject lands should have been assessed independently.

While the lands adjoin the permitted residential development to the west and may benefit from future servicing and access opportunities arising from that development, the Chief Executive remains satisfied that the main conclusions of the Settlement Capacity Audit still apply. In particular, the assessment identified that there are other, more suitable lands available within Dunleer capable of accommodating the revised housing allocation and which better support compact growth and the consolidation of development within the settlement.

The submission further contends that the permitted development on adjoining lands materially alters the suitability of the subject site and demonstrates a high level of deliverability. The Chief Executive acknowledges that planning permission has been granted for 84 dwellings on adjoining lands and that this represents a positive indication of development activity in the area. However, the existence of a planning permission on adjoining lands does not, in itself, justify the extension of the settlement boundary nor the rezoning of additional lands. The Chief Executive remains satisfied that the assessment of Site 2 appropriately considered the suitability, availability and deliverability of the lands.

The submission also raises concerns regarding the sufficiency of residential land supply within Dunleer and contends that additional lands should be identified to provide greater flexibility. The Chief Executive has considered this matter. However, the revised housing allocation for Dunleer increased from 146 units to 216 units under Variation No. 4, representing an additional housing requirement of 70 units. The Settlement Capacity Audit identified that planning permission had been granted or was under consideration for approximately 336 residential units within the settlement. In addition, Variation No. 4 identifies Dunleer Site 3 for C1 Mixed Use zoning, which has the potential to accommodate approximately 90 residential units as part of a coordinated mixed-use development.

Accordingly, the Chief Executive is not satisfied that there is a deficiency in residential development capacity within Dunleer. Having regard to the suitability, availability and deliverability of lands assessed through the Settlement Capacity Audit, the Chief Executive remains satisfied that sufficient capacity has been identified to accommodate the future growth requirements of Dunleer and that additional residential lands are not required at this time. However, the matters raised can be considered in a future review of the County Development Plan.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

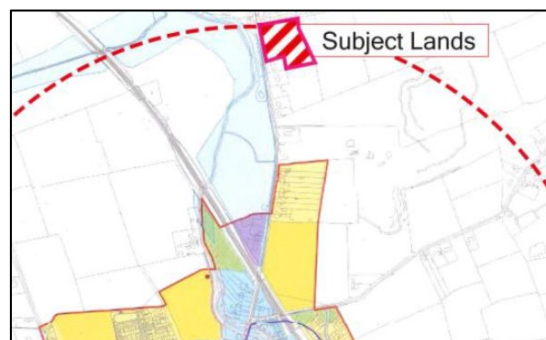
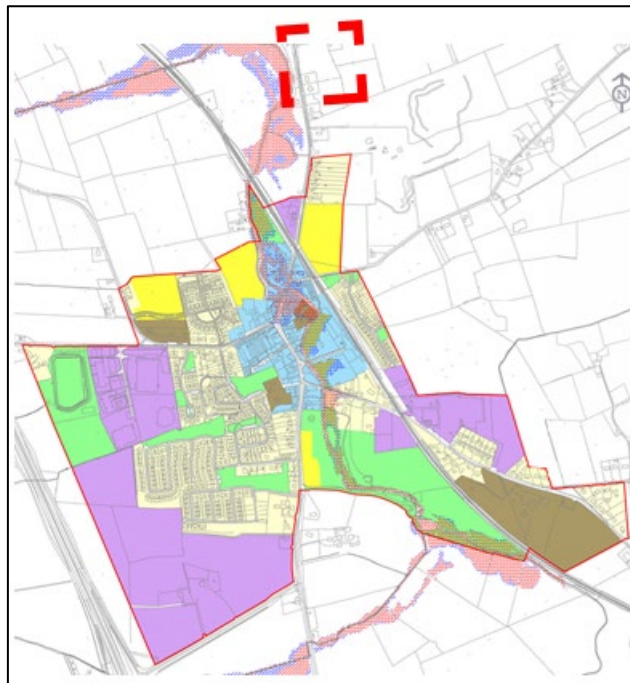
Submission Ref. No.

LH-C208-114

Submitted by:

Comma Architects and Genesis Planning
Consultants on behalf of Peal Developments Ltd

Maps showing the location of the subject lands:



Map included within the submission - subject lands in dashed red.



Summary of Main Issues Raised:

The submission seeks the rezoning of lands at Cluide, Dunleer to A2 New Residential Phase 1.

It is submitted that Dunleer has not received a proportionate increase in residentially zoned lands relative to its role within the settlement hierarchy. The submission argues that the proposed Variation reduces the extent of residentially zoned lands within the settlement and fails to provide sufficient flexibility or headroom to accommodate future housing growth.

The submission states that the subject lands are sequentially located, available for development, benefit from existing infrastructure and are not subject to flood risk. It is argued that the lands represent an appropriate location for residential development and could contribute towards the delivery of housing within the lifetime of the current Development Plan.

Chief Executive's Response:

The submission is noted. It contends that Dunleer has not been provided with a sufficient increase in residentially zoned lands under Variation No. 4 and that additional lands should be identified to support future housing growth within the settlement. The submission further seeks the rezoning of lands at Cluide, Dunleer, identified as Site 6 through the Settlement Capacity Audit process, to A2 New Residential Phase 1. However, the Chief Executive does not accept this position. The revised housing allocation for Dunleer has increased from 146 units to 216 units, representing an additional housing requirement of 70 units. The Settlement Capacity Audit identified approximately 12ha of residentially zoned land within the settlement and noted that planning permission has been granted or is under consideration for 336 residential units on approximately 11ha of these lands. The Chief Executive therefore remains satisfied that Dunleer possesses sufficient residential development capacity to accommodate the revised housing allocation arising from the National Planning Framework First Revision (2025) and associated Section 28 Guidelines.

The submission seeks the rezoning of lands identified as Site 6 through the Settlement Capacity Audit undertaken in support of Variation No. 4. The subject lands were assessed through the Settlement Capacity Audit and were subsequently discounted. The assessment concluded that the site is located outside the settlement boundary of Dunleer and that its development for residential purposes would not contribute to compact growth or the consolidation of development within the settlement.

Furthermore, the Settlement Capacity Audit identified other, more suitable lands within the settlement boundary capable of accommodating the revised housing allocation for Dunleer. Accordingly, the Chief Executive remains satisfied that sufficient capacity and flexibility exist within the settlement to accommodate the revised housing growth requirements and that the rezoning of the subject lands is not required at this time. The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.



2.3.6 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Self-Sustaining Towns – Carlingford

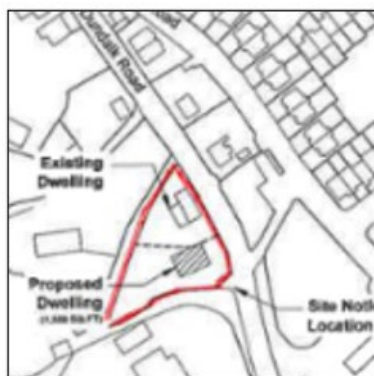
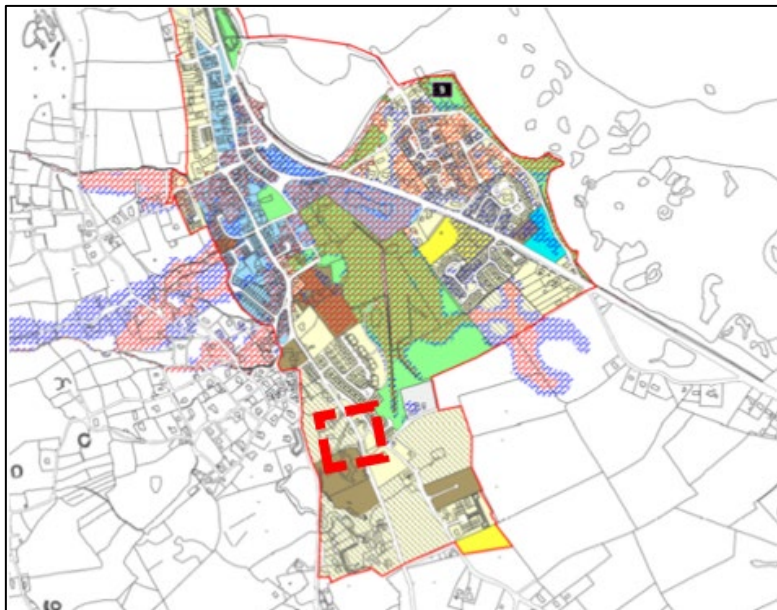
Submission Ref. No.

LH-C208-14

Submitted by:

Aidan McCarron

Maps showing the location of the subject lands:



Map included within submission
– subject lands outlined in red



Current zoning – subject lands
outlined in red

Summary of Main Issues Raised:

The submission seeks the rezoning of lands at St. Jude's, Carlingford from L1 Strategic Reserve to A2 New Residential Phase 1 to facilitate the construction of a single dwelling. It is argued that the lands are located within the settlement boundary, adjoin existing residential development and would represent a logical extension of the existing built-up area.



Chief Executive's Response:

As part of Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and to identify sites capable of contributing towards housing delivery. A number of sites were assessed in Carlingford including lands identified as Site 7. The lands subject to this submission form part of Site 7.

The site was subject to both a desktop assessment and site inspection. A number of constraints were identified including the fragmented nature of the lands, the presence of existing dwellings within the wider site, multiple ownerships and significant trees and hedgerows along the site boundaries, particularly along the elevated western boundary adjoining Rooskey Road. It was also considered that the extent of land available for development was limited. While portions of the lands could have been considered potentially suitable for residential development, the overall site was not considered appropriate for rezoning through Variation No. 4 and was subsequently discounted.

Whilst this submission relates to a smaller section of the larger site, it is considered that the proposed rezoning is not warranted. Alternative lands within Carlingford were identified for residential development which were considered more suitable having regard to their overall development potential and ability to contribute towards the housing allocation identified for Carlingford. Accordingly, it is not considered appropriate to rezone these lands under this variation.

Chief Executive's Recommendation:

No change.



2.3.7 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Self-Sustaining Towns – Clogherhead

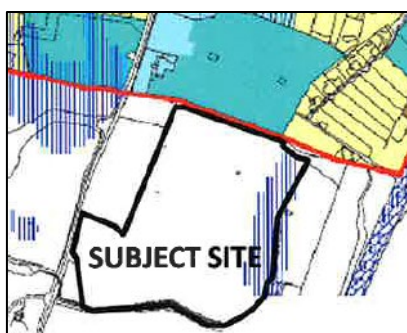
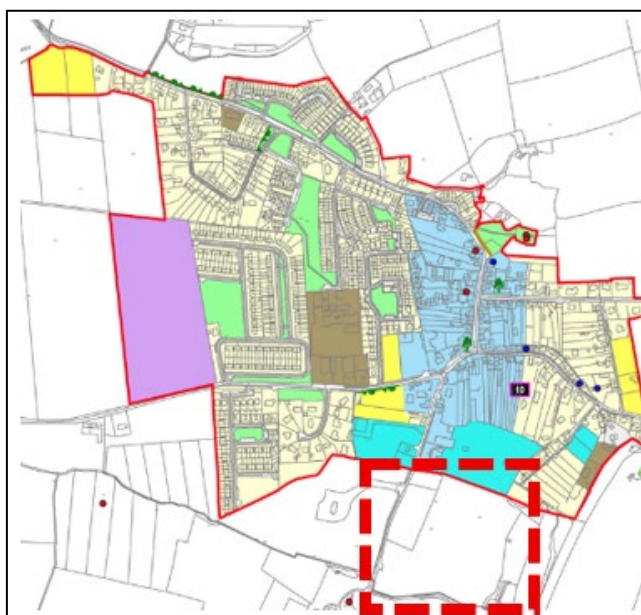
Submission Ref. No.

LH-C208-153

Submitted by:

EHP Services on behalf of Narc Property Ltd

Maps showing the location of the subject lands:



Map illustrating subject lands outlined in black (outside of settlement boundary)

Summary of Main Issues Raised:

Request to include lands at Glaspistol, Clogherhead within the settlement boundary and rezone to A2 New Residential Phase 1. The lands are located off the Drogheda Road (R166), south of Ashling Caravan Park and behind St. Denis' Cemetery. The site extends to approximately 5.33ha.

The submission concurs with the Settlement Capacity Audit findings that Clogherhead has an insufficient supply of serviced residential land however questions the suitability and deliverability of the lands proposed for rezoning:

- A long-standing residentially zoned site on Chapel Road has remained undeveloped despite being zoned in previous plans. An application was made in 2022 and there has been no attempt in the intervening years to resubmit; this raises questions regarding deliverability.



- Regarding the Ard Na Mara and The Beeches land there is no evidence to suggest that the lands can deliver housing and if re-zoned they may now be subject to Residential Land Tax. Concern is expressed regarding road access arrangements, road capacity and the practicalities of servicing the proposed lands.
- The development of either proposed land bank will alter the character and setting of the area.

The submission lands are deemed to be more suitable, for the following reasons:

- The lands are under the control of a single owner willing to develop them.
- The re-zoning is supported by experts in the property field (letters of support from 2no. estate agents).
- Re- zoning of the site would provide housing immediately thereby eliminating incremental sprawl.
- Site adjoins the town centre and is closer to existing services etc. than the other land banks. Access to the site is readily available and its development would improve connectivity to facilities such as the Dreadnots GAA Club.
- The lands adjoin the existing Strand Hill housing development and would be a logical extension of the village.
- Rezoning would help meet both immediate and long-term housing needs while avoiding fragmented growth elsewhere.

Chief Executive's Response:

The lands on Chapel Road referenced in the submission were zoned for residential development under the Louth County Development Plan 2021-2027. As part of the preparation of Variation No. 4, a Settlement Capacity Audit was undertaken to evaluate residential land supply and identify suitable lands capable of contributing to future housing delivery within Level 1-4 settlements.

In Clogherhead, several sites were assessed, including the lands referred to in the submission as the Ard na Mara lands (Site 1a) and The Beeches lands (Site 2). Following assessment, both sites were considered suitable for rezoning to residential use. Site 1a represents a consolidation and infill opportunity within the existing urban structure and was also the subject of a Call for Sites submission (Submission No. 23). Site 2 is contiguous with the existing settlement boundary, benefits from an existing footpath connection to the north, and both sites are served by existing water and wastewater infrastructure. Accordingly, the Chief Executive is satisfied that these lands are deliverable and can contribute towards the sustainable growth of Clogherhead.

The lands which are the subject of this submission are located to the south of the established settlement boundary and would constitute an outward extension of the settlement into the surrounding countryside. Furthermore, part of the site may be subject to flooding along the eastern boundary. While the submission contends that the site is available and capable of development, it is considered that the sites identified through the Settlement Capacity Audit represent a more sequential approach to accommodating future residential growth, consistent with the compact growth objectives of the National Planning Framework- First Revision (2025) and the Regional Strategic Economic Strategy. Additionally, it is considered that there is sufficient land proposed to be rezoned to residential in Clogherhead having regard to the Section 28 Guidelines NPF Implementation: Housing Growth Requirements.

Chief Executive's Recommendation:

No change.



2.3.8 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Self-Sustaining Towns – Termonfeckin

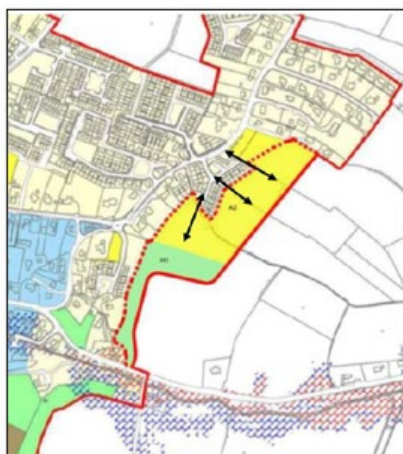
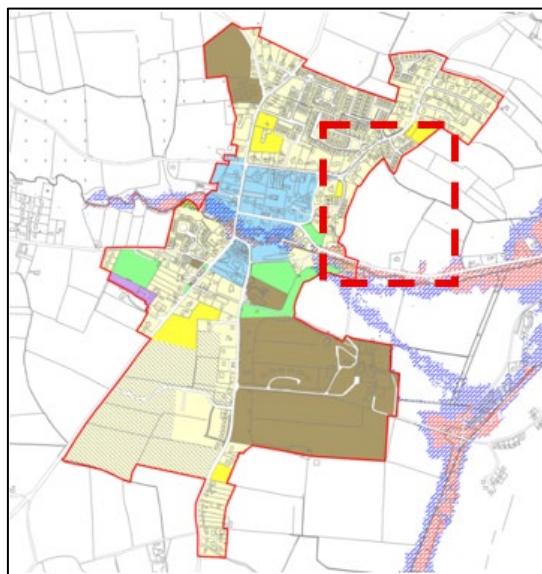
Submission Ref. No.

LH-C208-81

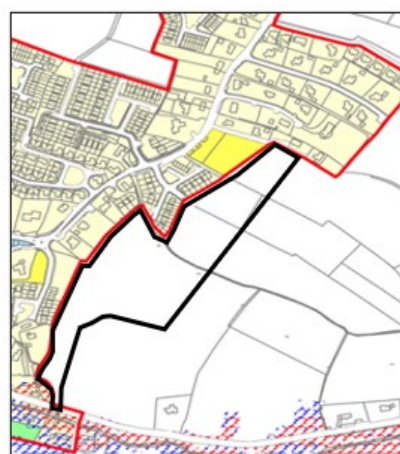
Submitted by:

Brady Hughes Consulting on behalf of Andrew Purcell and Des Campbell

Maps showing the location of the subject lands:



Map included with submission –
subject lands outlined in red



Current zoning – subject lands
outlined in black

Summary of Main Issues Raised:

The submission seeks the rezoning of lands at Duffsfarm, Termonfeckin, identified as Site 3 within the Settlement Capacity Audit, for residential development and open space.

It is contended that the northern portion of the lands represents a logical extension of the existing settlement and is contiguous with the existing built-up area of Termonfeckin. The submission further argues that the lands are sequential in nature, are available for development and are capable of being serviced by existing water and wastewater infrastructure.



The submission disputes the decision to discount the lands at Stage 1 through the Settlement Capacity Audit and argues that the lands should have progressed to a more detailed assessment stage. It is submitted that the lands contribute to compact growth, are capable of accommodating residential development in the short term and do not exhibit any significant infrastructural or environmental constraints which would warrant their exclusion.

The submission further contends that Termonfeckin has experienced significant population growth and housing delivery in recent years and that additional residential lands are required to support the future growth of the settlement. Concerns are also raised regarding the deliverability of certain existing residentially zoned lands within the settlement, and it is argued that a broader range of sites should be identified to provide greater flexibility and choice.

The submission therefore requests that the settlement boundary be extended and that the northern portion of the lands be zoned A2 New Residential Phase 1, together with associated H1 Open Space lands.

Chief Executive's Response:

The submission is noted. The Chief Executive does not accept the contention that the lands were incorrectly discounted through the Settlement Capacity Audit. While the submission contends that the lands should have progressed to a more detailed stage of assessment, the Chief Executive remains satisfied that the approach adopted through the Settlement Capacity Audit was appropriate and consistent with the methodology applied across all settlements.

The Settlement Capacity Audit assessed sites having regard to their suitability, availability and deliverability. While the subject lands are available for development, they are located outside the settlement boundary and the assessment concluded that the proposed extension of residential and open space zoning at this location would further extend development into the surrounding rural area and would not represent the most appropriate form of settlement expansion having regard to the existing built form.

The Settlement Capacity Audit identified other lands within the existing settlement boundary of Termonfeckin which were considered more appropriate to accommodate the revised housing growth requirements at this time. In this regard, the Chief Executive remains satisfied that sufficient capacity has been identified to accommodate the revised housing allocation for the settlement and that the zoning of additional lands beyond those identified through Variation No. 4 is not required at this time.

The submission further contends that existing residentially zoned lands may not come forward for development and that additional lands should therefore be identified to provide greater flexibility. The Chief Executive acknowledges this concern and has considered this matter through the preparation of Variation No. 4. However, the purpose of the Settlement Capacity Audit was to identify the most appropriate lands required to accommodate the revised housing growth requirements of the settlement having regard to their suitability, availability and deliverability.

The Chief Executive notes that Termonfeckin has experienced strong housing delivery in recent years, with 61 dwellings completed between Q4 2021 and Q1 2026. The Settlement Capacity Audit also identified approximately 4 hectares of serviced residentially zoned land remaining within the settlement and concluded that more suitable lands located within the existing settlement boundary were available to accommodate the revised housing allocation.

While the submission raises concerns regarding the potential delivery of some residentially zoned sites, the Chief Executive is not satisfied that sufficient evidence has been provided to demonstrate that the identified land supply is incapable of meeting the revised housing requirements for Termonfeckin. Having regard to the strong level of housing delivery already occurring within the settlement, the existing residential land supply available within the settlement boundary and the suitability, availability and deliverability of lands assessed through the

Settlement Capacity Audit, the Chief Executive remains satisfied that the lands identified through Proposed Variation No. 4 represent the most appropriate locations for future growth and that the inclusion of additional residential lands is not warranted at this time

While the Chief Executive acknowledges that the lands possess a number of positive attributes and could be capable of accommodating development in the future, it is not satisfied that sufficient justification has been provided to extend the settlement boundary or amend the proposed zoning for Termonfeckin as part of Variation No. 4. These lands can be re-evaluated as part of the County Development Plan review at which time it is likely there will be a requirement to identify additional lands for residential development.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

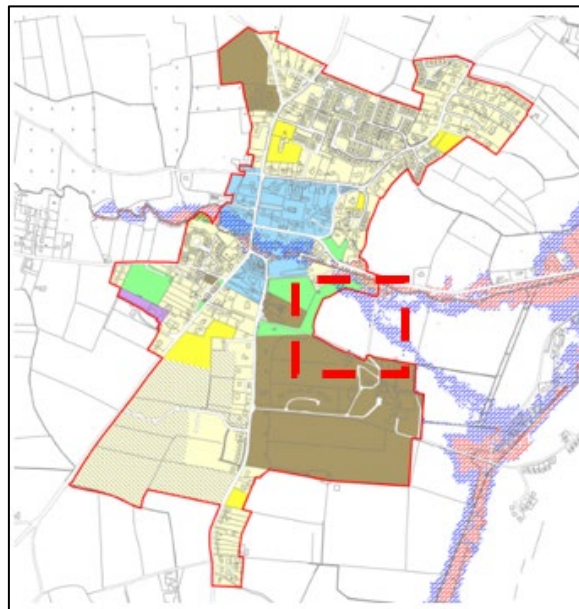
Submission Ref. No.

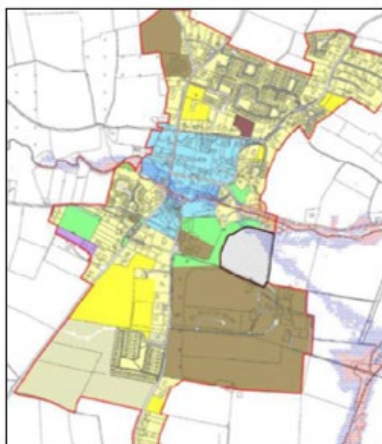
LH-C208-108

Submitted by:

Brady Hughes Consulting on behalf of the Smith Family

Maps showing the location of the subject lands:





Map included within the submission – subject lands outlined in black



Current zoning – subject lands outlined in black (lands outside of settlement boundary)

Summary of Main Issues Raised:

The submission seeks the rezoning of lands identified as Site 8 in Termonfeckin within the Settlement Capacity Audit to A2 New Residential Phase 1.

The submission states that the lands were assessed through the Settlement Capacity Audit process and argues that they represent a logical and sequential extension of the existing settlement and are capable of delivering housing during the lifetime of the current Development Plan.

The submission disputes the conclusions reached in the Settlement Capacity Audit and argues that access can be provided to the site and that the lands would contribute to the compact and orderly growth of Termonfeckin. It is further argued that the lands are available for development, are not subject to significant constraints and should have progressed to further assessment through the Settlement Capacity Audit process.

The submission also highlights the level of recent housing delivery in Termonfeckin and contends that additional residential lands should be identified to support the growth of the settlement and provide flexibility for future housing supply.

Chief Executive's Response:

The submission is noted. The subject lands were assessed as Site 8 in Termonfeckin as part of the Settlement Capacity Audit undertaken in support of Variation No. 4 and were subsequently discounted at Stage 1 of the assessment process. While it is acknowledged that access could be provided and that the lands represent a logical extension of the settlement, the Chief Executive remains of the view that there are other, more suitable lands available within the settlement to accommodate the revised housing allocation.

The purpose of Variation No. 4 is to identify the most appropriate lands required to accommodate the revised housing growth requirements arising from National Planning Framework- First Revision (2025) and associated Section 28 Guidelines. In this regard, lands were assessed having regard to their suitability, availability and deliverability and as a result, sufficient lands have been identified to accommodate the housing requirements of the settlement during the lifetime of the current County Development Plan.

Whilst the submission contends that the lands represent a logical and sequential extension of the settlement, the Chief Executive considers that priority should be given to other more suitable lands located within the existing settlement boundary where sufficient capacity already exists to accommodate future growth.

The Chief Executive acknowledges that the lands may have a role to play in the future growth of Termonfeckin. However, having regard to the findings of the Settlement Capacity Audit and the quantum of lands already identified through Variation No. 4, the rezoning of the subject lands is not considered necessary at this time. However, this can be reconsidered as part of a future review of the County Development Plan.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

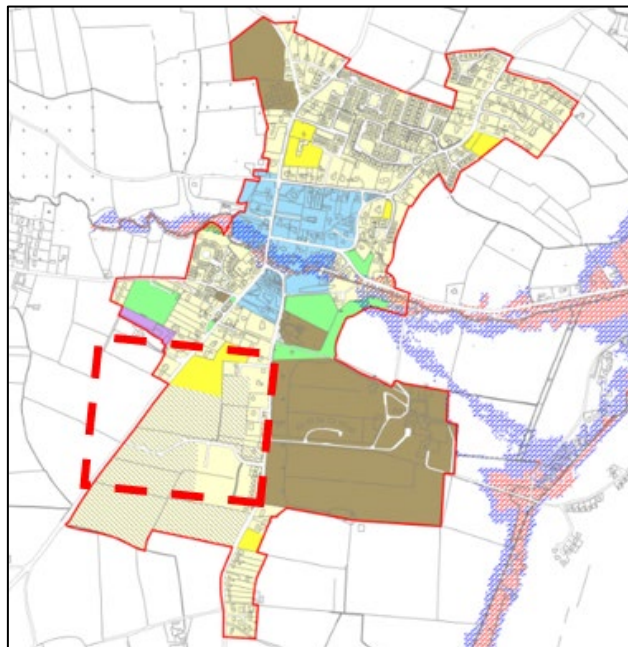
Submission Ref. No.

LH-C208-120

Submitted by:

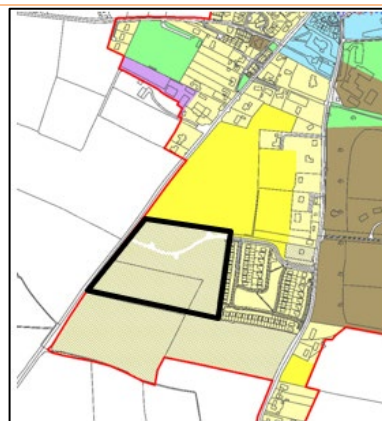
Hughes Planning and Development Consultants on behalf of J. Murphy Developments Ltd. and Ravala Ltd

Maps showing the location of the subject lands:





Map included within the submission – subject lands outlined in red



Proposed Variation No. 4 zoning map – subject lands outlined in black (no change proposed to current zoning)

Summary of Main Issues Raised:

The submission relates to lands south of Termonfeckin and seeks the extension of the proposed A2 New Residential Phase 1 zoning to include the remainder of the landholding not identified for rezoning under Variation No. 4.

The submission welcomes the inclusion of part of the landholding within the proposed A2 New Residential Phase 1 zoning and contends that there is no justification for excluding the balance of the lands. It is submitted that the lands are serviceable, well located in proximity to the village centre, public transport and community facilities and are capable of delivering housing within the lifetime of the current Development Plan.

The submission further argues that the lands are suitable for residential development, support compact growth and would make efficient use of existing and planned infrastructure.

Chief Executive's Response:

The submission is noted. The subject lands form part of the wider landholding identified as Site 1 in the Settlement Capacity Audit undertaken in support of Variation No. 4. The full extent of Site 1 extends to approximately 11.16ha and was considered to be in excess of the lands required to accommodate the revised housing allocation for Termonfeckin. Accordingly, the Chief Executive identified an area of approximately 5.5ha for rezoning, having regard to the revised housing requirements for Termonfeckin.

Whilst it is acknowledged that the remaining lands could be developed in conjunction with the lands proposed for rezoning, the purpose of Variation No. 4 is not simply to identify lands capable of accommodating residential development, but to identify the most suitable lands required to accommodate the revised housing growth requirements arising from the National Planning Framework First Revision (2025) and associated Section 28 Guidelines during the lifetime of the current Development Plan. In this regard, the Settlement Capacity Audit identified sufficient residential development capacity to accommodate the revised housing allocation for Termonfeckin.

While the Chief Executive acknowledges that the remaining lands may be capable of accommodating residential development in the future and could form part of the longer-term growth of Termonfeckin, it is not considered necessary to identify additional residential lands beyond those already proposed under Variation No. 4. The Chief Executive therefore remains satisfied that the extent of lands proposed for rezoning is appropriate having regard



to the revised housing allocation for the settlement and the findings of the Settlement Capacity Audit. The subject lands can be reconsidered as part of a future review of the County Development Plan.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.



2.3.9 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Self-Sustaining Towns – Tullyallen

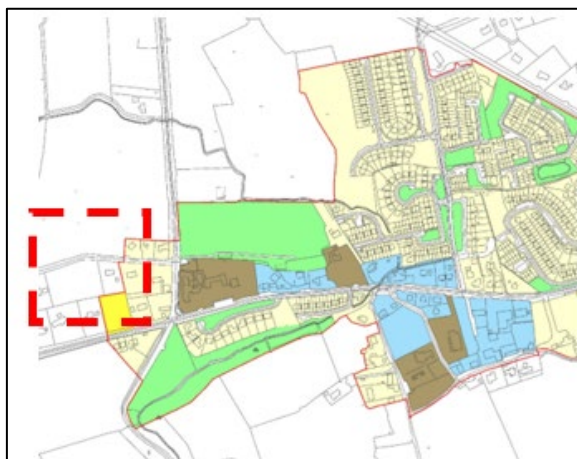
Submission Ref. No.

LH-C208-154

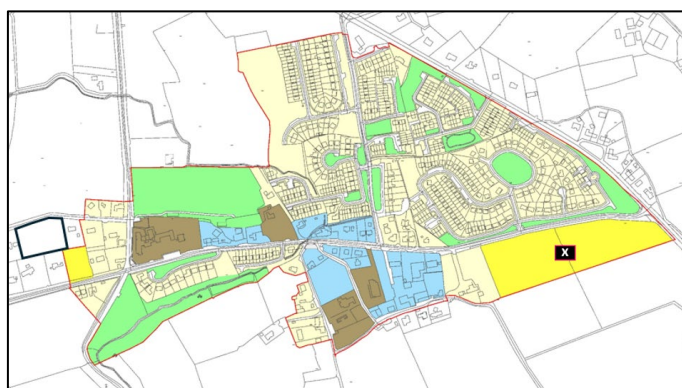
Submitted by:

A1 Design Services on behalf of Noel Russell

Maps showing the location of the subject lands:



Google Aerial Image – subject
lands outlined in red



Tullyallen Proposed Variation No. 4 zoning map –
subject site outlined in black (lands are outside of
settlement boundary)

Summary of Main Issues Raised:

The submission seeks the rezoning of land parcel 'Plot A' to residential shown on the maps above. It is stated that the site is located immediately adjacent to the existing village and is surrounded by housing on three sides. The residential zoning would represent a logical extension of the village and infill development. Given the size of the site (1ha) it would not be economically viable for farming purposes. However, it is estimated that the site could accommodate 10no. dwellings.

Public water and foul sewer infrastructure is available and a way leave can be provided to facilitate sewer connection alternatively a foul sewer pipe can be provided which would benefit other properties in the vicinity.

It is stated that the site would not adversely affect the World Heritage landscape associated with Newgrange, Knowth and Dowth, due to existing screening by trees and landform.

Furthermore, the site is within walking distance of a variety of local amenities, and the village is served by a local link bus service.



Chief Executive's Response:

As part of Proposed Variation No. 4, a Settlement Capacity Audit was undertaken to assess lands within Level 1-4 settlements and to identify sites capable of contributing towards housing delivery. Several sites were assessed in Tullyallen including lands identified as Site 7 (the lands to which the submission pertains)

The site was subject to both a desktop assessment and site inspection. It was determined that the nearest water and wastewater services are some 135m to the east of the site, and as such it was discounted at Stage 1 of the assessment process, as the site was not readily serviced.

Alternative lands were identified for residential development which were considered more suitable having regard to their overall development potential and ability to contribute towards the housing allocation identified for Tullyallen. Accordingly, it is not considered appropriate to rezone these lands under this variation.

Chief Executive's Recommendation:

No change.



2.3.10 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Small Towns and Villages – Baltray

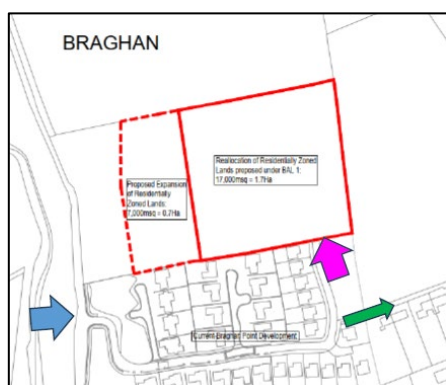
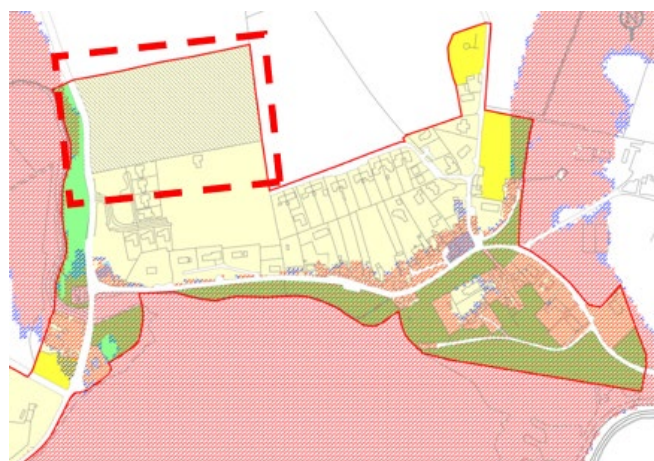
Submission Ref. No.

LH-C208-98

Submitted by:

Stephen Ward Town Planning & Development
Consultants Ltd on behalf of Agrio Limited

Maps showing the location of the subject lands:



Maps included with the submission indicating the location and indicative layout of the subject lands

Summary of Main Issues Raised:

The submission relates to lands in Baltray identified as BAL 1 in the Settlement Capacity Audit. The submission supports the proposed rezoning of additional lands from L1 Strategic Reserve to A2 New Residential Phase 1 under Variation No. 4. However, they are requesting that the configuration and extent of the proposed zoning should be amended.

The submission states that the proposed A2 zoning should be reconfigured to include the eastern portion of the landholding rather than the western portion identified in the draft Variation. It is submitted that the residential development of the lands has always been envisaged as an extension of the existing Braghan Point development and that successive planning permissions relating to that development have provided for future vehicular, pedestrian and service connections to lands to the north.

It is further submitted that an access road, footpaths and associated infrastructure designed to facilitate future development of the northern lands are currently under construction. The submission contends that the proposed



zoning configuration does not fully reflect the infrastructure now being delivered on the ground and that the eastern portion of the landholding can be more efficiently served through existing and permitted infrastructure.

The submission also seeks an increase in the extent of lands proposed for A2 New Residential Phase 1 zoning. It is submitted that the additional lands would facilitate a logical extension of the existing residential development while remaining broadly consistent with the scale of development envisaged under Variation No. 4. The submission states that the proposed amendment would support the efficient use of existing infrastructure, facilitate a coordinated pattern of development and contribute to the vitality of Baltray by supporting local services and facilities.

Chief Executive's Response:

The submission is noted. The subject lands were assessed as Baltray Site 1 within the Settlement Capacity Audit undertaken in support of Variation No. 4. The Settlement Capacity Audit concluded that the lands are suitable, available and capable of accommodating residential development and recommended the rezoning of a portion of the overall landholding to A2 New Residential Phase 1.

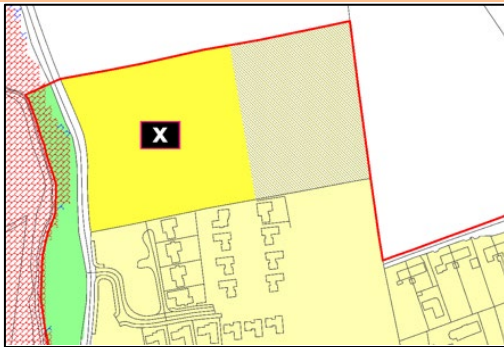
The Chief Executive notes that the Settlement Capacity Audit did not identify any fundamental constraint affecting the remainder of the landholding. Rather, the extent of lands proposed for rezoning was informed by the housing requirements of the settlement and the need to ensure that an appropriate quantum of land was identified to accommodate future growth. In this regard, the Settlement Capacity Audit concluded that the full extent of the landholding exceeded the residential land requirements identified for Baltray and therefore only part of the site was considered necessary to accommodate the revised housing allocation.

The Chief Executive acknowledges the content of the submission regarding the configuration of the proposed zoning boundary and, in particular, that the eastern portion of the landholding could benefit from permitted and developing infrastructure associated with the adjoining Braghan Point development.

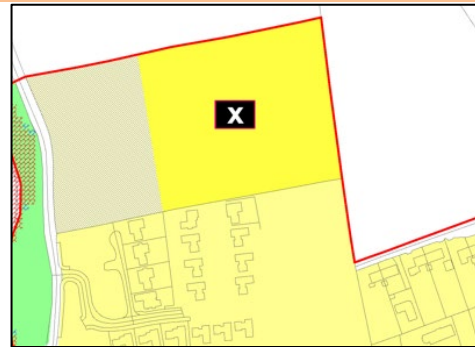
Having considered the information submitted, the Chief Executive is satisfied that a modification to the configuration of the BAL 1 zoning may be appropriate, subject to the rezoned area remaining consistent with the extent of land identified through the Settlement Capacity Audit. While the Chief Executive acknowledges the applicant's request for an enlarged residential zoning, the full extent of the landholding was previously deemed to be in excess of the housing requirements of the settlement. It is considered that no justification or evidence has been provided to depart from this conclusion and so it is proposed that the subject lands zoning is reconfigured whilst retaining the same quantum of lands.

Chief Executive's Recommendation:

1. Modify the proposed BAL 1 zoning to reconfigure the location of the lands identified for A2 New Residential Phase 1 zoning having regard to the existing and permitted access arrangements associated with the adjoining Braghan Point development, while maintaining the overall quantum of residentially zoned land as proposed under Variation No. 4.



Zoning Proposed under Variation No. 4



Amended proposed zoning

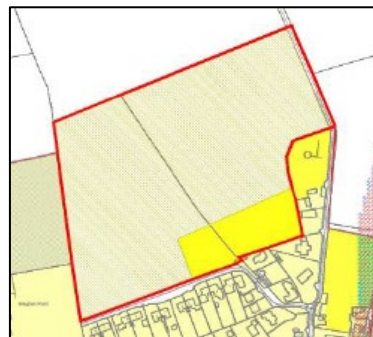
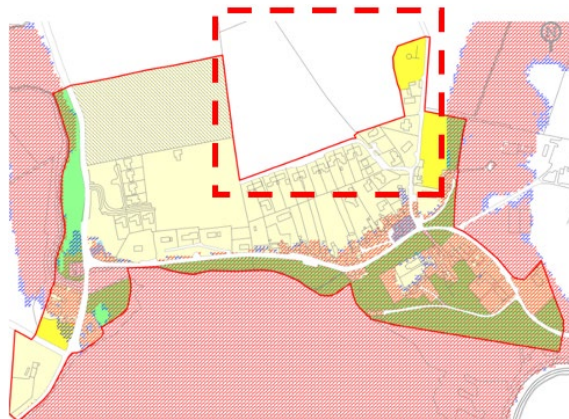
Submission Ref. No.

LH-C208-100

Submitted by:

Brady Hughes Consulting on behalf of the
Hartigan Family

Maps showing the location of the subject lands:



Map included within the submission – illustrating requested
rezoning (A2 New Residential Phase 1 and L1 Strategic Reserve)

Summary of Main Issues Raised:



The submission relates to lands in Baltray identified as BAL 2 in the Settlement Capacity Audit. It seeks the following:

- Extend the settlement boundary of Baltray to include the entire area of the lands;
- Rezone part of the lands previously granted 4no. dwellings under Reg Ref 11/120 to A2 New Residential Phase 1 (as a minimum);
- Rezone the remaining lands to L1 Strategic Reserve.

It is submitted that the lands are available for development are well located within the settlement and have previously benefited from planning permissions for residential development. The submission contends that the lands are capable of accommodating housing growth within the settlement and should be included as part of the residential land supply identified through Proposed Variation No. 4.

The submission further states that the lands were previously identified within the settlement boundary and argues that the current proposal does not fully recognise the development potential of the site.

Chief Executive's Response:

The submission is noted. The subject lands were assessed as Site 2 as part of the Settlement Capacity Audit undertaken in support of Variation No. 4. The Assessment concluded that while the lands are generally suitable and available for residential development, there are access constraints associated with the existing access arrangements from Collier's Lane and The Cottages which were not currently suitable to cater for a residential development of this scale. The Chief Executive acknowledges that alternative access arrangements have been suggested. However, the Settlement Capacity Audit identified Baltray Site 1 as the most appropriate location to accommodate the revised housing allocation for Baltray having regard to the criteria of suitability, availability and deliverability.

The submission also refers to previous planning permissions on the lands; however, this permission expired a number of years ago and does not alter the conclusions reached in the Settlement Capacity Audit.

The Chief Executive acknowledges that the subject lands may be appropriate for the future residential growth of Baltray, however, having regard to the findings of the Settlement Capacity Audit and the sufficiency of lands identified through BAL 1, it is not considered necessary to rezone Site 2 lands as part of Variation No. 4. This can be reconsidered in a future review of the County Development Plan.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

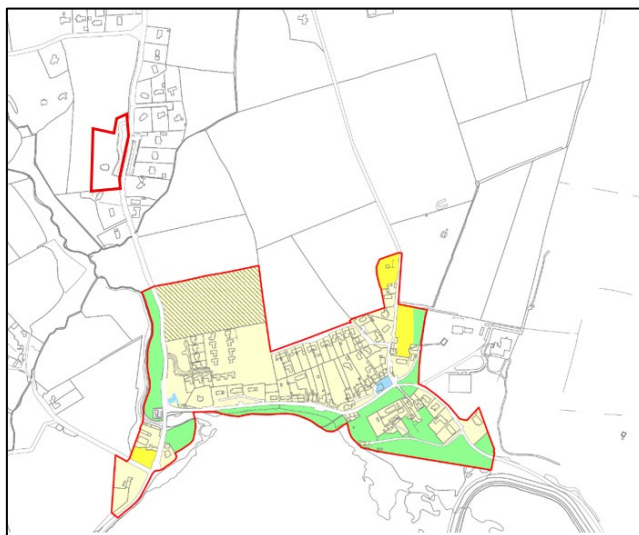
Submission Ref. No.

LH-C208-111

Submitted by:

Brady Hughes Consulting on behalf of Olan McNeece

Maps showing the location of the subject lands:



Location of subject lands (outlined in red) c.250m to the north of the settlement boundary of Baltray



Aerial image included with the submission identifying the subject lands (outlined in red). The lands are some 250m outside of the settlement boundary of Baltray.

Summary of Main Issues Raised:

The submission relates to lands located north of the settlement of Baltray. It is submitted that the lands should be reconsidered for residential development and included within the Baltray settlement boundary under an appropriate low-density residential or serviced sites zoning objective. The submission states that the lands benefit from an established access, existing infrastructure and a planning history which included residential development on the site. It is further argued that the lands represent a serviced development opportunity and should not have been discounted at Stage 1.



Chief Executive's Response:

The submission is noted. The site is physically separated from both Baltray and Termonfeckin and the extension of either settlement to include these lands would result in urban sprawl and an ad-hoc pattern of land use zoning and would therefore not be in the interest of proper planning and sustainable development.

While the Chief Executive acknowledges the presence of some existing infrastructure and residential development in the area, it remains satisfied that the rezoning of lands at this location would not contribute to compact growth or the consolidation of development within either settlement.

In addition, the Settlement Capacity Audit identified sufficient and more appropriate lands to accommodate the revised housing allocation for Baltray. The purpose of Variation No. 4 is to identify the most appropriate lands required to accommodate the revised housing growth requirements and it is not its role to identify all lands capable of supporting residential development. Accordingly, the Chief Executive does not consider it appropriate to extend the settlement boundary or rezone the lands as part of Variation No. 4. The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.



2.3.11 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Small Towns and Villages – Collon

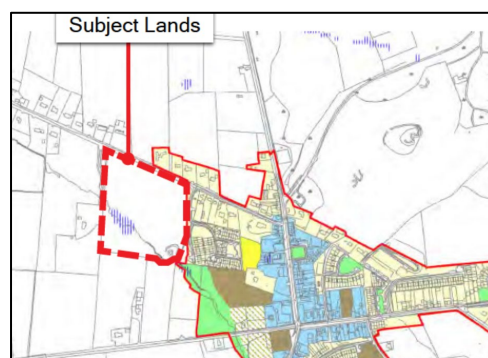
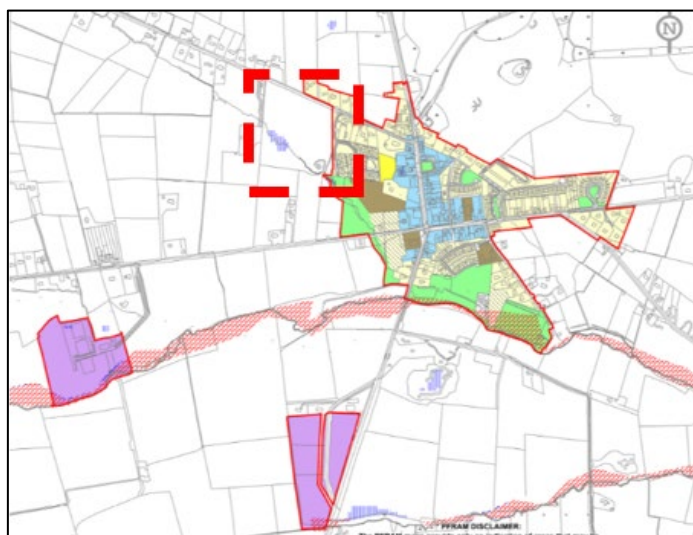
Submission Ref. No.

LH-C208-59

Submitted by:

Genesis Planning Consultants on behalf of
Boyne Ventures Ltd

Maps showing the location of the proposed lands:



Maps included within the submission - subject lands outlined in red (lands situated outside of the settlement boundary of Collon).

Summary of Main Issues Raised:

The submission relates to Site 7 in Collon, which was assessed and discounted as part of the Settlement Capacity Audit undertaken in support of Variation No. 4. The submission requests that the Planning Authority reconsider this assessment and re-evaluate the site for residential development.

It is submitted that the lands represent a sequentially appropriate infill opportunity immediately adjoining existing residential development and within walking distance of the village centre, school, community facilities and public transport services. The submission contends that the site performs favourably when assessed against a range of planning and sustainability criteria, including proximity to services, contribution to compact growth, accessibility and potential for infill development.



The submission also states that the lands are available for development, benefit from road frontage, have access to existing infrastructure and are capable of contributing to housing delivery within the settlement. Supporting information has also been submitted regarding developer interest in the site and the ability to bring the lands forward for residential development. The submission therefore requests that the Planning Authority reconsider its decision to discount Site 7 and include the lands within the proposed zoning changes under Proposed Variation No. 4.

Chief Executive's Response:

The submission is noted. The Chief Executive notes that the assessment of sites was not based solely on any single criterion or scoring exercise from an infrastructure assessment, but rather on a comprehensive evaluation of planning, environmental, and settlement strategy considerations. The purpose of the Settlement Capacity Audit was to objectively assess and identify the most appropriate lands required to accommodate the revised housing growth requirements for each settlement arising from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines, rather than all lands capable of accommodating residential development. The conclusions reached reflect the overall outcome of that assessment process rather than any individual criterion in isolation.

While the Chief Executive has given careful considerations to Site 7, the Settlement Capacity Audit concluded that the development of these lands for residential purposes would not contribute to the consolidation or compact growth of Collon and would instead result in further outward expansion of the settlement. The Chief Executive remains satisfied with this conclusion. Furthermore, the Audit identified other lands which were considered more appropriate to accommodate future residential growth within the settlement.

The submission also contends that additional residential lands should be identified in Collon and that Site 7 should form part of this land supply. The Chief Executive does not accept this viewpoint. The quantum and location of lands proposed under Variation No. 4 was determined having regard to the revised housing growth requirements and the findings of the Settlement Capacity Audit. The Chief Executive remains satisfied that sufficient lands have been identified to accommodate the revised housing requirements of Collon and that the inclusion of Site 7 is not required at this time.

The matters raised therefore do not give rise to any amendment to Proposed Variation No. 4, but they can be reconsidered in the context of a future review of the County Development Plan.

Chief Executive's Recommendation:

No change.

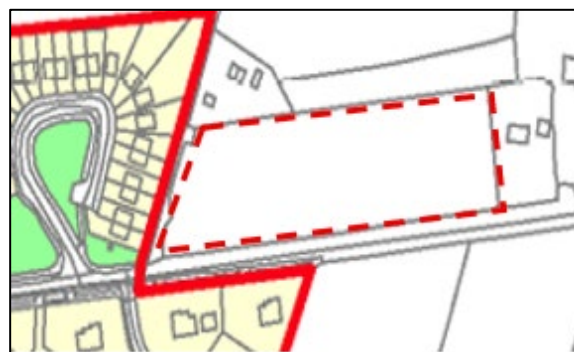
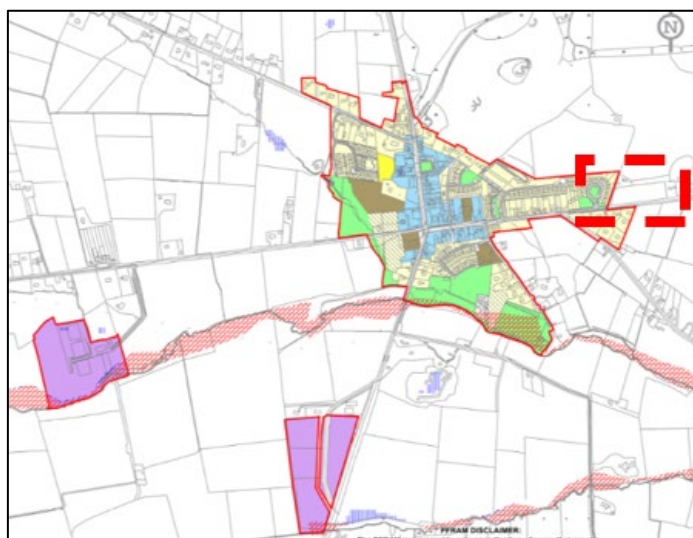
Submission Ref. No.

LH-C208-64

Submitted by:

Calmont Ventures Limited

Maps showing the location of the subject lands:



Maps illustrating the subject lands outlined in red (lands situated outside of the settlement boundary of Collon).

Summary of Main Issues Raised:

The submission relates to Site 10 in Collon, which was assessed and discounted as part of the Settlement Capacity Audit undertaken in support of Variation No. 4. The submission requests that the Planning Authority reconsider this assessment and review the decision to exclude the site from the proposed zoning changes.

It is submitted that the subject lands are available for development, are accessible to local services and facilities and are capable of contributing towards the delivery of housing within the settlement. The submission therefore requests that Site 10 be reconsidered for residential zoning as part of Variation No. 4.

Chief Executive's Response:

The submission is noted. Whilst the submission seeks the rezoning of Site 10 for residential development, the Chief Executive remains satisfied that the development of these lands would not contribute to the consolidation

or compact growth of Collon and would instead result in further outward expansion of the settlement. The Chief Executive is therefore satisfied that it would not be appropriate to extend the settlement boundary to include these lands.

Furthermore, the purpose of the Settlement Capacity Audit was not to identify every site capable of accommodating residential development, but rather to identify the most appropriate lands required to accommodate the revised housing growth requirements of the settlement from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines. In this regard, the Chief Executive remains satisfied that sufficient lands have been identified to accommodate the growth of Collon. The matters raised can be reconsidered in the context of a future review of the County Development Plan.

The issues raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

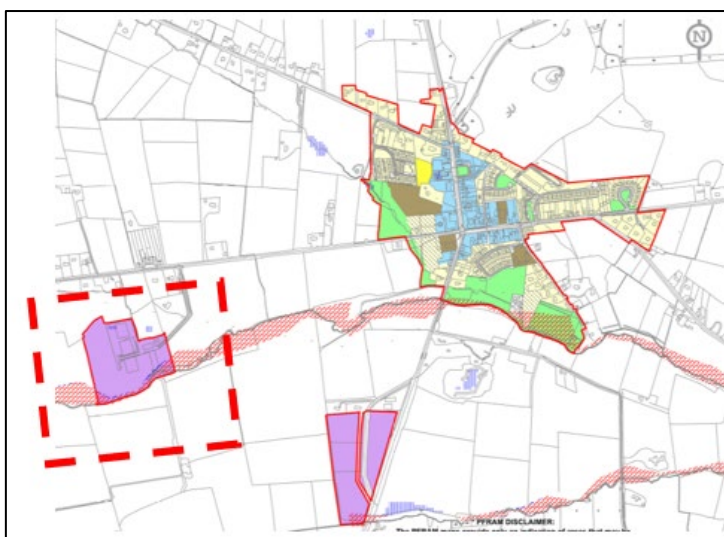
Submission Ref. No.

LH-C208-95

Submitted by:

Brady Hughes Consulting on behalf of Tom Condon

Maps showing the location of the subject lands:





Map included within the submission - subject lands outlined in red



Current zoning – subject lands outlined in dashed red (lands outside of settlement boundary)

Summary of Main Issues Raised:

The submission seeks the extension of the existing E1 Employment / Enterprise zoning at Collon Business Park to include lands immediately west of the existing business park.

It is submitted that Collon Business Park is an established employment location that supports a significant number of jobs and has a proven record of investment and expansion. The submission states that the existing business park is nearing full capacity and that additional lands are required to facilitate future business growth and attract further investment.

The submission further states that the lands immediately west of the business park represent a logical extension of the business park, can build upon existing infrastructure and services and would support a balanced pattern of growth in Collon.

Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges the information submitted regarding Collon Business Park and the contribution it makes to employment and economic activity within the area. However, the purpose of Variation No. 4 is to align the Core Strategy and associated land use zonings with the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and the associated Section 28 Guidelines. In this regard, Variation No. 4 is focused on identifying lands required to accommodate the revised housing allocations for settlements through the Settlement Capacity Audit process. A review of employment land requirements and employment zonings across the County does not form part of the scope of the Variation.

These matters can be considered in a future review of the County Development Plan.

Chief Executive's Recommendation:

No change.

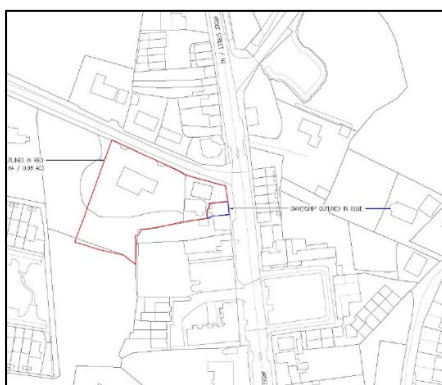
Submission Ref. No.

LH-C208-125

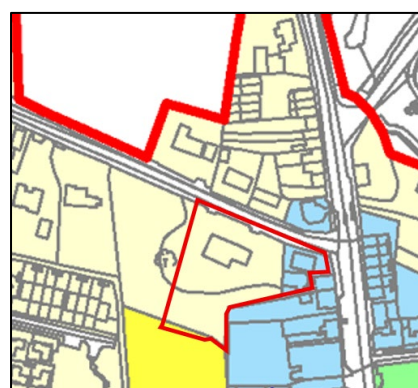
Submitted by:

Coakley O'Neill Town Planning on behalf of Tony Coffey CPS Ireland Ltd

Maps showing the location of the subject lands:



Map included within the submission
- subject lands outlined in red



Current zoning – subject lands
outlined in red

Summary of Main Issues Raised:

The submission seeks the rezoning of lands at Oriel Road, Collon from A1 Existing Residential to B1 Town or Village Centre.

1. Site Location and Description

The submission relates to two adjoining parcels of land in Collon comprising an existing Applegreen service station and an adjoining bungalow site on Oriel Road. The surrounding area contains a mix of residential and village centre uses and is located at the junction of the N2 and Oriel Road.



2. Planning Policy Context

The submission references policies in the Louth County Development Plan supporting compact growth, infill and brownfield development, town centre living, and the consolidation of village centres.

The bungalow site is currently zoned A1 Existing Residential, while the service station is zoned B1 Town or Village Centre.

The proposal aligns with objectives COL 1, COL 3 and COL 4, which support village centre consolidation, infill development and mixed-use development within the village core

3. Proposed Variation No. 4

No zoning changes are proposed for Collon under Variation No. 4.

4. Submission

The lands adjoin the existing village centre and that extending the B1 zoning would facilitate the comprehensive redevelopment of the overall landholding.

The proposal is a logical and sequential extension of the village centre that would support mixed-use development.

The lands are in a sustainable location, are serviceable, are under single ownership and could deliver retail, commercial, employment and residential development.

5. Conclusion

The rezoning the lands to B1 Town or Village Centre would facilitate a mixed-use redevelopment that would contribute to the vitality and viability of Collon, provide additional residential units and commercial opportunities, and support investment in the village centre.

Chief Executive's Response:

The purpose of Variation No. 4 to the Louth County Development Plan 2021-2027 (as varied) is to identify additional lands for residential development in order to ensure consistency with the National Planning Framework (First Revision, 2025) and to give effect to the Housing Growth Requirements Guidelines for Planning Authorities.

The subject site comprises lands zoned B1 Town or Village Centre, reflecting the existing Applegreen service station, and A1 Existing Residential, reflecting the existing bungalow on the site. Both zoning designations facilitate opportunities for residential development and, therefore, it is not considered necessary to rezone the lands at this time.

In addition, it should be noted that a shop of less than 200 sq.m is *Open for Consideration* on lands zoned A1 Existing Residential.

A comprehensive review of all land use zonings will be undertaken as part of the preparation of the next County Development Plan. Any proposed amendments to the zoning of these lands can be considered as part of that statutory review process.

Chief Executive's Recommendation:

No change.



2.3.12 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Small Towns and Villages – Dromiskin

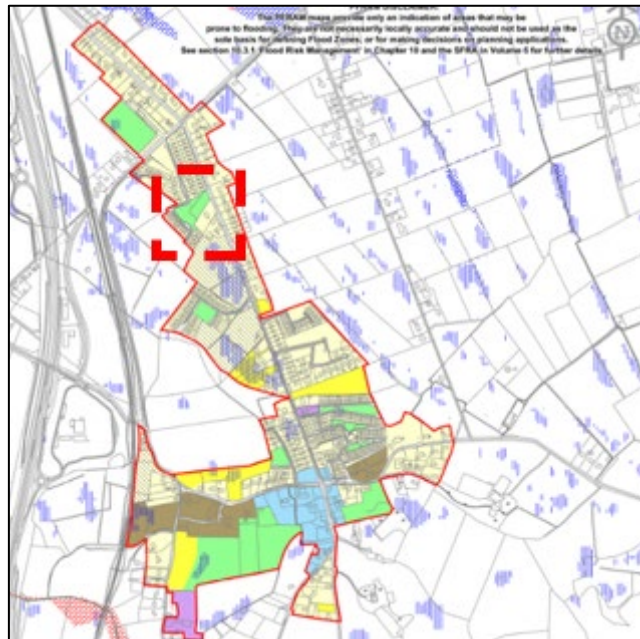
Submission Ref. No.

LH-C208-42

Submitted by:

Dolores Haigh Hadfield

Maps showing the location of the subject lands:



Current zoning - subject lands outlined in blue

Summary of Main Issues Raised:

The submission seeks the rezoning of lands at Commons Road, Dromiskin from H1 Open Space to residential. It is stated that the lands are located within the settlement boundary, are served by existing infrastructure and represent a natural infill opportunity within the existing built-up area. The submission highlights the proximity of the site to local services, community facilities and recreational amenities and contends that the lands would support compact growth and the sustainable development of Dromiskin.



Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges that the subject lands are an infill opportunity within the settlement boundary of Dromiskin and that they are situated in proximity to existing residential development and services within the settlement.

A Settlement Capacity Audit was carried out as part of the Variation. These involved lands being assessed having regard to suitability, availability and deliverability. While the subject lands may have the potential to accommodate residential development, the Chief Executive considers that there are other lands within Dromiskin that are more appropriate in terms of their relationship to the town/village centre, accessibility to services and contribution to the consolidation of the existing settlement pattern. Accordingly, the request to amend the zoning of this site is therefore not recommended.

Chief Executive's Recommendation:

No change.

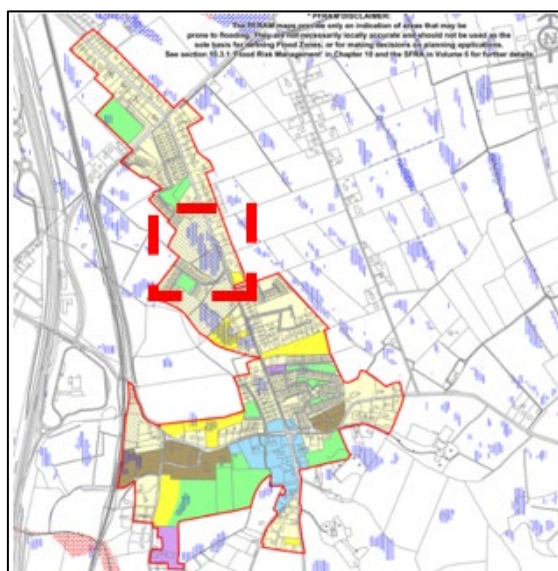
Submission Ref. No.

LH-C208-68

Submitted by:

Genesis Planning Consultants on
behalf of Hollywood Developments
Ltd

Maps showing the location of the subject lands:





Map included within the submission
- subject lands outlined in red



Current zoning – subject lands
outlined in black dash

Summary of Main Issues Raised:

The submission relates to Site 2 in Dromiskin, which was assessed and discounted at Stage 1 as part of the Settlement Capacity Audit undertaken in support of Variation No. 4.

It is submitted that the lands represent an appropriate infill opportunity within the settlement and are located adjacent to existing residential development and local services. The submission states that the lands are capable of accommodating approximately 84 residential units and can be brought forward in the short term by an established property developer.

The submission disputes the findings of the Settlement Capacity Audit in relation to flood risk and contends that the majority of the site is located within Flood Zone C and should not have been discounted at Stage 1. It is submitted that the lands are affected by pluvial flooding only, and that any flood-related issues can be addressed through site design measures.

The submission further states that housing delivery within Dromiskin has lagged behind demand and that the subject lands can address this.

Chief Executive's Response:

The submission is noted. The submission contends that the majority of the lands are located within Flood Zone C and that the primary issue relates to pluvial flood risk. Whilst this is acknowledged the Strategic Flood Risk Assessment prepared as part of the proposed Variation analysed the potential flood risk of lands under the OPW Mid-Range and High-End Future Climate Risk Scenario Area Mapping. These maps identified the subject lands as being at risk under the 'High End Future Scenario'.

A precautionary approach has been undertaken to avoid the potential risk of flooding as a result of climate change. National planning policy and the Planning System and Flood Risk Management Guidelines (2009) require flood risk to be avoided and managed through the application of the sequential approach which seeks to direct development away from areas at risk of flooding. Should any updated guidance be provided in the future as to how to deal with flood risk as a result of climate change, this will be incorporated into the Plan review process.

While the Chief Executive has considered the arguments advanced in support of the subject lands, it is not considered that is appropriate to zone these lands for residential use.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

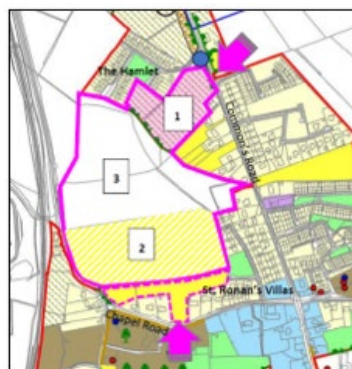
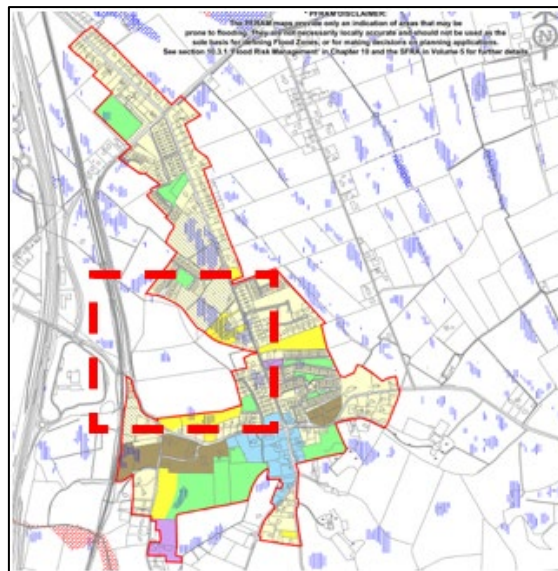
Submission Ref. No.

LH-C208-101

Submitted by:

Stephen Ward Town Planning & Development
Consultants Ltd on behalf of E. Fallon

Maps showing location of subject lands:



Map included within the submission
- subject lands outlined in pink.



Current zoning – subject lands outlined in
dashed black (lands outside of settlement
boundary)



Summary of Main Issues Raised:

The submission asserts that the level of additional residential zoning proposed for Dromiskin under Variation No. 4 is insufficient having regard to the size of the settlement, the range of services available and the growth proposed for other settlements within the same tier of the settlement hierarchy.

The submission seeks the rezoning of Parcel 1 and 2 to residential and Parcel 3 to Strategic Reserve.

It is submitted that the lands are centrally located, capable of being serviced and would contribute to compact growth. The submission further contends that the subject lands are suitable for residential development having regard to their proximity to the village centre, existing infrastructure, public transport and community facilities.

Chief Executive's Response:

The submission is noted. The lands identified as Parcel 1, (Drom Site 1) Parcel 2 (Drom Site 5) and Parcel 3 (Drom Site 5) were assessed through the Settlement Capacity Audit

In terms of Parcel 1, (Drom Site 1), the assessment identified significant flood risk constraints affecting the lands and concluded that no change to the existing L1 Strategic Reserve zoning was warranted.

In regard to Parcel 2 (Drom Site 5), while the lands were considered generally suitable and available for residential development, it was concluded that there were other, more suitable lands available within the settlement to accommodate the revised housing allocation. Accordingly, the site was discounted.

The submission also requests that Parcel 3 (Drom Site 5) be identified as L1 Strategic Reserve. However, the purpose of Variation No. 4 is to identify the lands required to accommodate the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines during the lifetime of the current Development Plan.

The Chief Executive remains satisfied that sufficient residentially zoned land has been identified within Dromiskin through Variation No. 4 to meet the housing allocations and that the rezoning of additional lands is not required at this time.

While the Chief Executive acknowledges that some of these lands may have a role to play in the future growth of the settlement, they are not required to meet the current housing requirements identified through Variation No. 4. The future role, function and zoning of these lands may be considered as part of a future review of the County Development Plan when the longer-term growth of Dromiskin can be assessed in a comprehensive and cohesive manner.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.



2.3.13 Chief Executive's Summary, Response and Recommendation on Zoning Submissions - Small Towns and Villages – Tallanstown

Submission Ref. No.

LH-C208-65

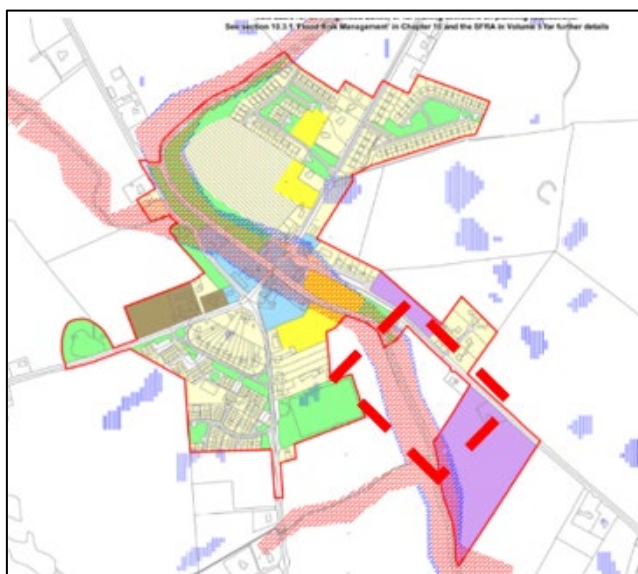
Submitted by:

Clermont
Partnership

Park

Enterprises

Maps showing the location of the subject lands:



Map included within the submission
- subject lands outlined in red



Current zoning – subject lands outlined in dashed
black (lands outside settlement boundary)

Summary of Main Issues Raised:

The submission relates to Site 3 in Tallanstown, which was assessed and discounted at stage 1 of the Settlement Capacity Audit undertaken in support of Variation No. 4. The submission requests that the Planning Authority reconsider this assessment and zone the subject lands for residential development.

It is submitted that the subject site represents a suitable infill opportunity adjoining the existing settlement boundary and benefits from access to local services, facilities, public transport and existing water and wastewater



infrastructure. The submission further contends that flood risk can be appropriately managed through site-specific assessment and design measures.

The submission also argues that the proposed strategy for Tallanstown relies on a single site to deliver the settlement's future housing growth and that additional residential lands should be identified to provide flexibility and choice. It is submitted that the subject lands are available for development and that there is no evidence that other sites considered through the Settlement Capacity Audit are similarly available.

Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges the information submitted regarding the location of the lands, their availability for development and their proximity to the town/village centre. However, following assessment through the Settlement Capacity Audit, the lands were discounted. In reaching this conclusion, regard was had to a range of considerations including the location of the lands relative to the existing settlement pattern, the lack of pedestrian connectivity to the town/village centre, flood risk, the presence of significant roadside trees and hedgerows as well as the availability of alternative lands which were considered more appropriate to accommodate future residential growth. Having regard to the above, it is not considered appropriate to rezone the lands at this time.

The submission contends that the proposed zoning strategy for Tallanstown relies on a single site to accommodate future residential growth and that additional lands should be identified to provide greater flexibility and choice if that site does not come forward for development. The Chief Executive acknowledges this concern. However, the objective of the Settlement Capacity Audit was to identify the most appropriate lands required to accommodate the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines. A number of sites were assessed within Tallanstown, and one site was identified as the most appropriate location to accommodate the settlement's future housing growth requirements. The Chief Executive remains satisfied that the lands proposed under Variation No. 4 are sufficient to accommodate the revised housing allocation for Tallanstown and that the inclusion of additional residential lands is not required at this time.

The issues raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.



2.3.14 Chief Executive's Summary, Response and Recommendation on Zoning Submissions – Rural Nodes

Dromin

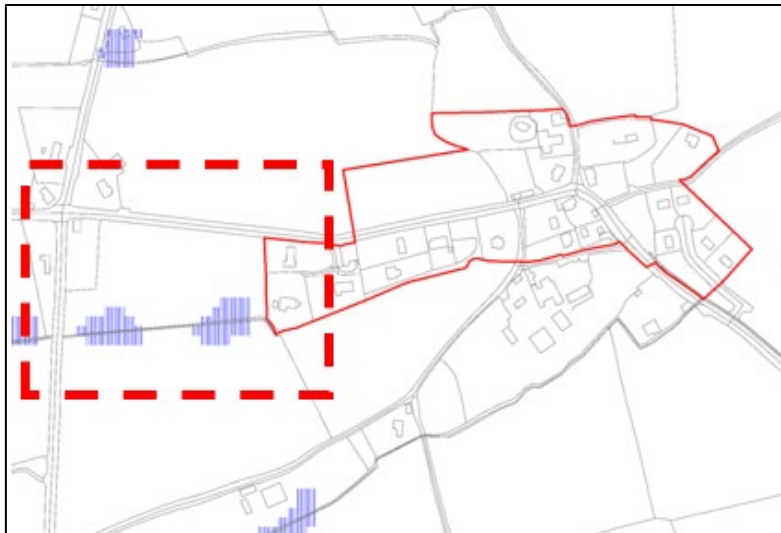
Submission Ref. No.

LH-C208-58

Submitted by:

Steven Peck Chartered Town Planners on behalf
of Daragh King

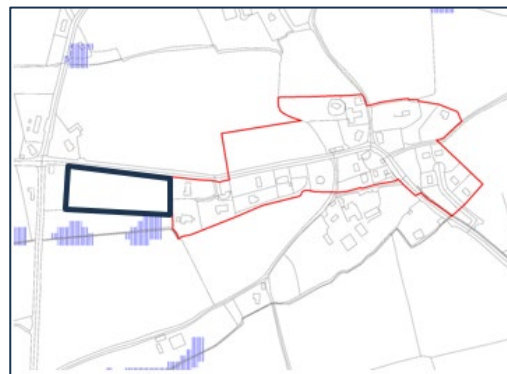
Maps showing the location of the subject lands:



Dromin Settlement Boundary and Flood Zones Map



Map included within submission –
subject lands outlined in red



Location of subject lands (outlined in black)
shown on Settlement Boundary Map

Summary of Main Issues Raised:

The submission seeks an extension of the Dromin Rural Node boundary to include approximately 1.26 ha of land. It is stated that having regard to the increased rural housing allocation proposed under Variation No. 4, the Council should enlarge rural node boundaries to facilitate additional rural housing development.



The submission contends that rural nodes are relevant to the implementation of the National Planning Framework housing growth requirements and should play a greater role in accommodating rural housing needs. It notes that an additional 215 housing units are proposed for rural areas but that no rural node boundary extensions are proposed.

The submission states that the Dromin Rural Node has not delivered any rural needs housing permissions under the current Development Plan and that the settlement should be expanded to enable it to contribute meaningfully to rural housing provision.

In support of the requested boundary extension, it is asserted that the subject lands adjoin the existing node boundary, have road frontage, could facilitate pedestrian links to Dromin National School, are not affected by heritage or archaeological constraints, are not identified as being at flood risk, and are available for development. The submission further notes that the lands are served by the Uisce Éireann water network and that wastewater servicing options could be assessed.

The submission therefore requests that the Dromin Rural Node boundary be extended to include the subject lands, or alternatively other lands within the wider landholding, to facilitate rural needs housing development.

Chief Executive's Response:

The submission is noted.

There are 24 Rural Nodes identified within Level 5 of the Louth Settlement Hierarchy. These Rural Nodes have no or limited water and wastewater infrastructure, services, and facilities. In accordance with national and regional planning policy, the Chief Executive considers that the focus of residential growth should be directed towards the higher-tier settlements, where there is a broader availability of amenities, services, and infrastructure. Rural Nodes are intended to support local communities and their rural hinterlands through limited locally based development rather than accommodate planned population growth.

The lands identified in the submission are not serviced in terms of wastewater infrastructure. Additionally, there is presently undeveloped land available within Dromin thus the inclusion of this site would result in leapfrogging and urban sprawl.

Having regard to the aforementioned it is considered that additional lands should not be included within Dromin

Chief Executive's Recommendation:

No change.

Gyles Quay

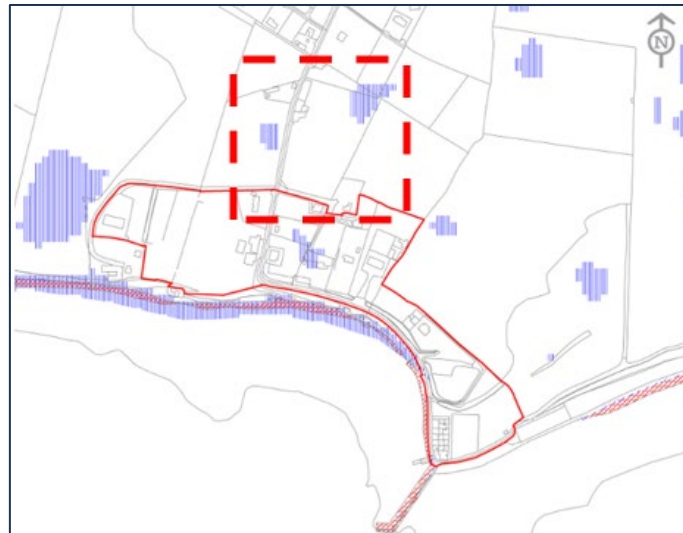
Submission Ref. No.

LH-C208-62

Submitted by:

Steven Peck Chartered Town Planners on behalf
of Alltec Fibre Ltd

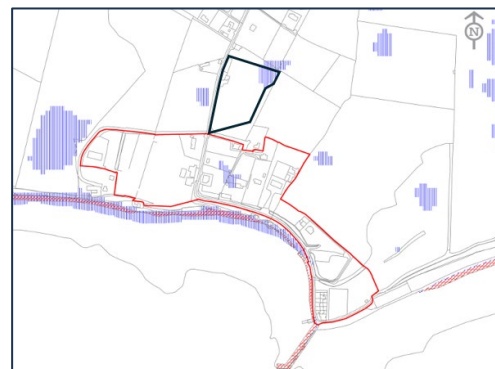
Maps showing the location of the subject lands:



Gyles Quay Settlement Boundary and Flood Zones Map



Map included within submission –
subject lands outlined in red



Settlement boundary map –
subject lands outlined in black

Summary of Main Issues Raised:

The submission, made on behalf of Alltec Fibre Ltd, requests that the boundary of the Gyles Quay Rural Node be extended to include approximately 1.45ha of land at Maddoxland, Riverstown, Co. Louth, in order to facilitate rural needs housing development.

The submission states that rural nodes have an important role to play in accommodating future rural housing demand and contends that the increased rural housing allocation proposed under Variation No. 4 should be



supported by the expansion of rural node boundaries. It notes that the proposed variation allocates an additional 215 housing units to rural areas but does not propose the enlargement of any rural nodes.

The submission states that no rural needs dwelling permissions have been granted within the Gyles Quay Rural Node during the current Development Plan period and that the settlement is therefore not contributing meaningfully to rural housing delivery. It is submitted that additional land should be incorporated within the node boundary to assist in meeting rural housing needs.

The submission highlights that the site adjoins the existing rural node boundary and represents a logical and sequential extension of the settlement along the L7079 road. The site benefits from existing road access, is available for development, and is not identified as being affected by archaeological, built heritage or flood risk considerations. aerial view showing subject lands adjoining Gyles Quay

The submission further notes that the lands are served by the Uisce Éireann water network, while wastewater servicing would require confirmation or alternative on-site treatment solutions. Reference is also made to the site's proximity to local amenities, including Gyles Quay beach and pier, and its future connectivity to the proposed Carlingford-Dundalk Greenway.

The submission therefore requests that the Gyles Quay Rural Node boundary be extended to include the subject lands to facilitate future rural needs housing development. site in relation to existing Gyles Quay settlement boundary.

Chief Executive's Response:

The submission is noted.

There are 24 Rural Nodes identified within Level 5 of the Louth Settlement Hierarchy. These Rural Nodes have no or limited water and wastewater infrastructure, services, and facilities. In accordance with national and regional planning policy, the Chief Executive considers that the focus of residential growth should be directed towards the higher-tier settlements, where there is a broader availability of amenities, services, and infrastructure. Rural Nodes are intended to support local communities and their rural hinterlands through limited locally based development rather than accommodate planned population growth.

The lands identified in the submission are not serviced in terms wastewater infrastructure.

Having regard to the aforementioned it is considered that additional lands should not be included within Gyles Quay.

Chief Executive's Recommendation:

No change.

Lordship

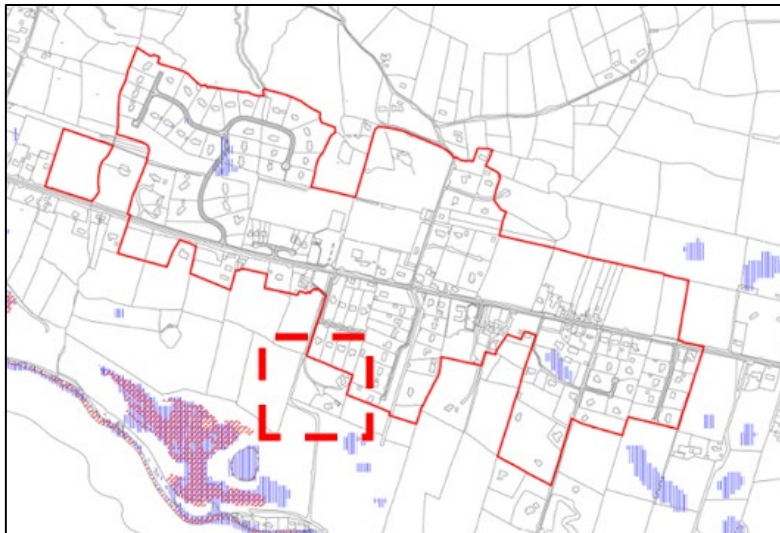
Submission Ref. No.

LH-C208-60

Submitted by:

Steven Peck Chartered Town Planners on behalf
of Niall Keenan and Thomas Keenan

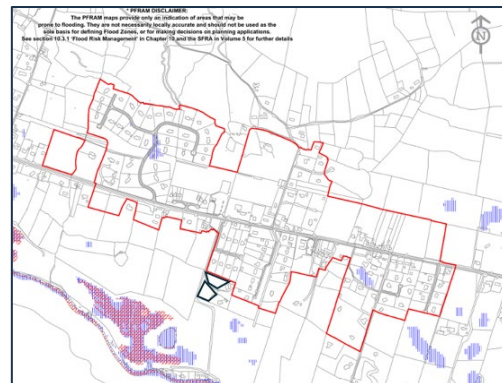
Maps showing the location of the subject lands:



Lordship Settlement Boundary and Flood Zones Map



Map included within submission –
subject lands outlined in red



Settlement boundary map –
subject lands outlined in black

Summary of Main Issues Raised:

The submission, made on behalf of Niall Keenan and Thomas Keenan, requests that the boundary of the Lordship Rural Node be extended to include approximately 0.55ha of land in order to facilitate rural needs housing development.



The submission states that rural nodes are an important mechanism for accommodating rural housing growth and contends that the increased housing allocation proposed under Variation No. 4 should be accompanied by an expansion of rural node boundaries. It notes that an additional 215 housing units are proposed for rural areas but that no corresponding extensions to rural nodes have been identified.

The submission states that the Lordship Rural Node has delivered only three rural needs dwellings under the current Development Plan and contends that the settlement is not making a meaningful contribution to meeting local rural housing needs. Consequently, additional lands should be incorporated within the node boundary.

In support of the request, the submission highlights that the site adjoins the existing Lordship Rural Node boundary, benefits from established access via the Cherrymount estate road network, and forms part of lands previously granted outline permission for four dwellings. It is submitted that the lands represent a logical extension of the settlement and an opportunity to complete previously permitted development.

The submission further states that the site is not affected by archaeological, built heritage or flood risk issues, is available for development, and can be served by existing water infrastructure, subject to confirmation of wastewater servicing arrangements. It also notes proximity to local services and facilities, including a primary school, community facilities and public transport.

The submission therefore requests that the Lordship Rural Node boundary be enlarged to include the subject lands and facilitate future rural needs housing development.

Chief Executive's Response:

The submission is noted.

There are 24 Rural Nodes identified within Level 5 of the Louth Settlement Hierarchy. These Rural Nodes have no or limited water and wastewater infrastructure, services, and facilities. In accordance with national and regional planning policy, the Chief Executive considers that the focus of residential growth should be directed towards the higher-tier settlements, where there is a broader availability of amenities, services, and infrastructure. Rural Nodes are intended to support local communities and their rural hinterlands through limited locally based development rather than accommodate planned population growth. The lands identified in the submission are not serviced in terms of wastewater infrastructure.

Having regard to the aforementioned, it is considered that additional lands should not be included within Lordship.

Chief Executive's Recommendation:

No change.

Mountbagnall

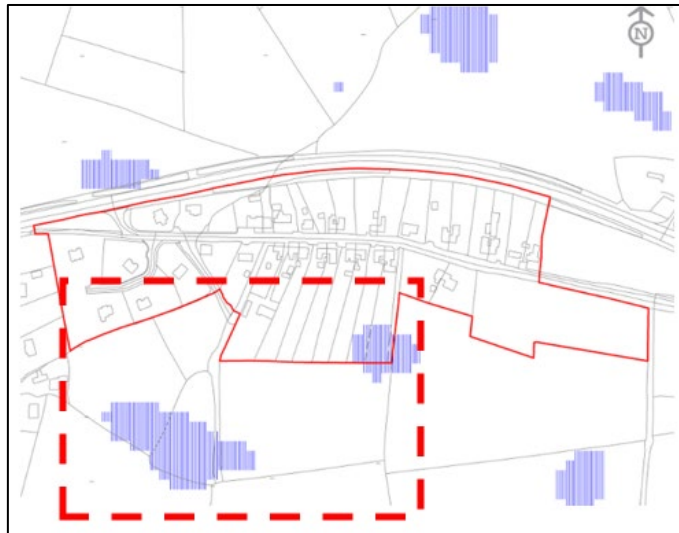
Submission Ref. No.

LH-C208-61

Submitted by:

Steven Peck Chartered Town Planners on behalf
of Alltec Fibre Ltd and Elizabeth Keenan

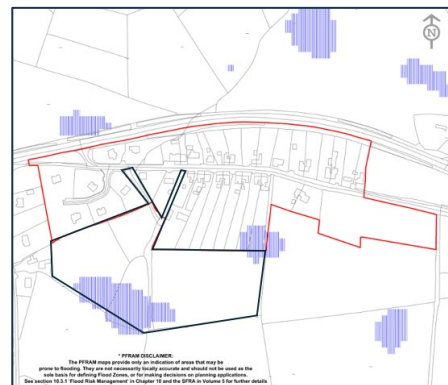
Maps showing the location of the subject lands:



Mountbagnall Settlement Boundary and Flood Zones Map



Map included within submission –
subject lands outlined in red



Settlement boundary map –
subject lands outlined in black



Summary of Main Issues Raised:

The submission, made on behalf of Alltec Fibre Ltd and Elizabeth Keenan, requests that the boundary of the Mountbagnall Rural Node be extended to include approximately 4.2ha of land. The lands are located immediately adjacent to the existing rural node boundary.

The submission states that rural nodes have an important role to play in accommodating future rural housing demand and contends that the increased rural housing allocation proposed under Variation No. 4 should be supported by the expansion of rural node boundaries. It notes that the proposed variation allocates an additional 215 housing units to rural areas but does not propose the enlargement of any rural nodes. The submission states that no rural needs dwelling permissions have been granted within the Mountbagnall Rural Node during the current Development Plan period and the settlement is therefore not contributing meaningfully to rural housing delivery. It is submitted that additional land should be incorporated within the node boundary to assist in meeting rural housing needs.

In support of the request, the submission highlights that the site adjoins the existing rural node boundary and represents a logical and sequential extension of the settlement. The site benefits from existing road access onto the L30813 and is available for development.

In addition, the site is not identified as being affected by archaeological, built heritage or flood risk considerations.

The submission further notes that the lands are served by the Uisce Éireann water network, while wastewater servicing would require confirmation or alternative on-site treatment solutions.

The submission therefore requests that the Mountbagnall Rural Node boundary be extended to include the subject lands to facilitate future rural needs housing development.

Chief Executive's Response:

The submission is noted.

There are 24 Rural Nodes identified within Level 5 of the Louth Settlement Hierarchy. These Rural Nodes have no or limited water and wastewater infrastructure, services, and facilities. In accordance with national and regional planning policy, the Chief Executive considers that the focus of residential growth should be directed towards the higher-tier settlements, where there is a broader availability of amenities, services, and infrastructure. Rural Nodes are intended to support local communities and their rural hinterlands through limited locally based development rather than accommodate planned population growth.

The lands identified in the submission are not serviced in terms wastewater infrastructure, they would result in urban sprawl, and a portion of the lands are subject to pluvial flooding.

Having regard to the aforementioned it is considered that additional lands should not be included within the settlement limit of Mountbagnall.

Chief Executive's Recommendation:

No change.

Philipstown

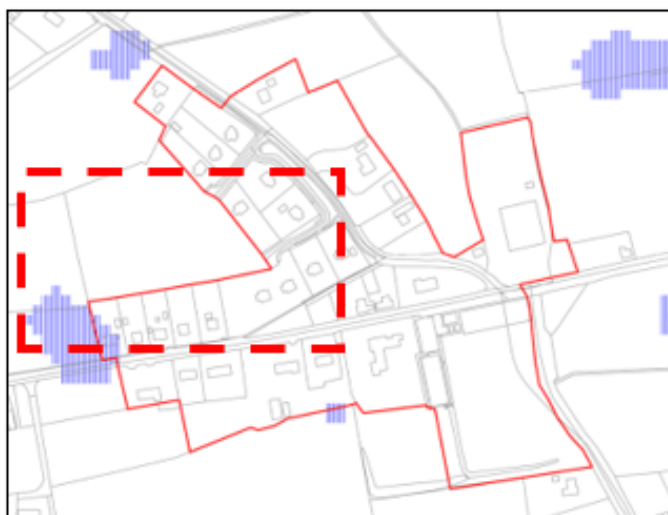
LH-C208-107

Submission Ref. No.

Brady Hughes Consulting on behalf of Lorrac Developments

Submitted by:

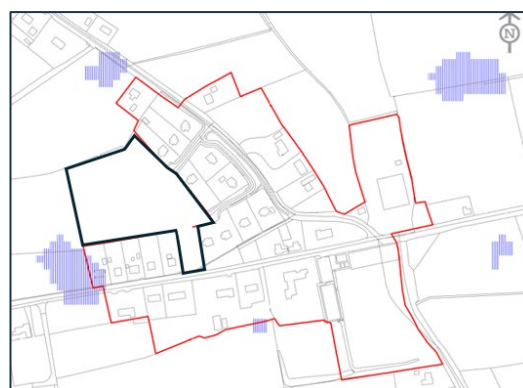
Maps showing the location of the subject lands:



Philipstown Settlement Boundary and Flood Zones Map



Map included within submission – subject lands outlined in red



Settlement boundary map – subject lands outlined in black

Summary of Main Issues Raised:

The submission seeks the extension of the settlement boundary of Philipstown Rural Node to incorporate lands in the ownership of Lorrac Developments and requests the inclusion of a site-specific objective to facilitate a developer-led serviced sites housing development.



The submission states that Philipstown performs an established settlement function and contains a range of community facilities and services. It is submitted that the subject lands adjoin the existing settlement and represent a logical and sustainable extension of the Rural Node.

It is stated that the lands are capable of supporting a coordinated serviced development and that a Developer Led Infrastructure (DLI) solution could provide an appropriate wastewater servicing arrangement. It is submitted that serviced sites within a defined settlement boundary would provide a more sustainable alternative to dispersed one-off housing and contribute towards rural regeneration and housing delivery.

Chief Executive's Response:

The submission is noted.

There are 24 Rural Nodes identified within Level 5 of the Louth Settlement Hierarchy. These Rural Nodes have no or limited water and wastewater infrastructure, services, and facilities. In accordance with national and regional planning policy, the Chief Executive considers that the focus of residential growth should be directed towards the higher-tier settlements, where there is a broader availability of amenities, services, and infrastructure. Rural Nodes are intended to support local communities and their rural hinterlands through limited locally based development rather than accommodate planned population growth.

The lands identified in the submission are not serviced in terms wastewater infrastructure, they would result in urban sprawl, and a portion of the lands are subject to pluvial flooding.

The submission refers to the potential use of Developer Led Infrastructure (DLI) and a serviced-sites model to facilitate development at Philipstown. A serviced sites initiative in Philipstown is not considered appropriate. The Chief Executive is unaware of any proposals by Uisce Éireann to provide wastewater treatment in Philipstown therefore any proposal to identify additional lands that would require private wastewater treatment would be considered ad hoc and unsustainable.

Having regard to the aforementioned it is considered that additional lands should not be included within the settlement limit of Philipstown.

Chief Executive's Recommendation:

No change.

Reaghstown

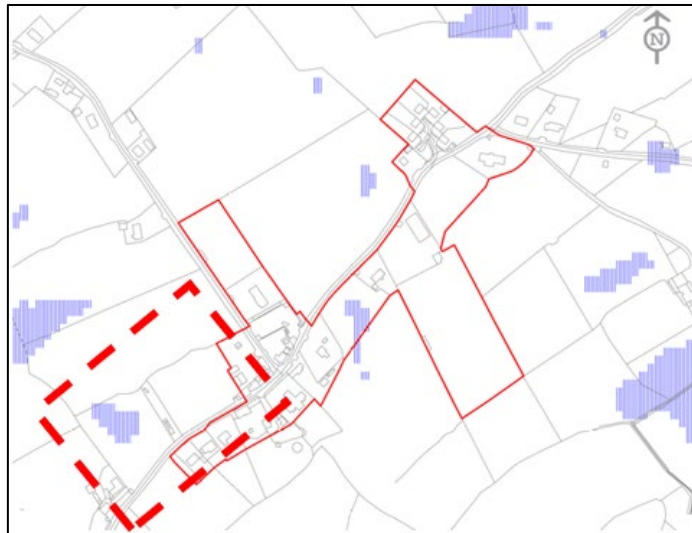
Submission Ref. No.

LH-C208-84

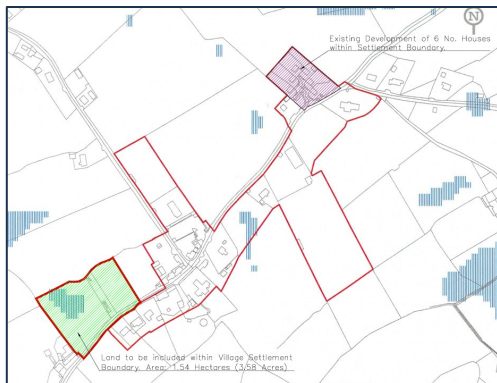
Submitted by:

Finnegan Jackson Building Surveyors Limited on
behalf of Tom Durnin

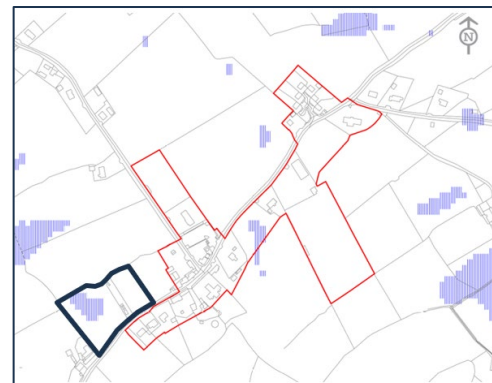
Maps showing the location of the subject lands:



Reaghstown Settlement Boundary and Flood Zones Map



Map included within submission – subject
lands shaded in green



Settlement boundary map – subject lands
outlined in black

Summary of Main Issues Raised:

The submission requests that lands shaded in green in the map provided, be included within the Rural Node Settlement Boundary of Reaghstown to facilitate future residential development. The lands are described as having significant road frontage and good accessibility, including direct access to the local road network and proximity to the N2 national route.



The submission refers to the objectives of the Louth County Development Plan 2021–2027 relating to Rural Nodes and the provision of housing in rural settlements. It highlights the role of Rural Nodes in supporting the "New Homes in Small Towns and Villages" initiative and in meeting rural-generated housing demand while strengthening and rejuvenating rural communities.

The submission contends that the subject lands can contribute to addressing housing demand and support the sustainable growth of Reaghstown by providing additional residential development opportunities within the settlement. Reference is also made to an existing residential development known as Mountain View, located within the current settlement boundary, as a precedent for residential development in the village.

Chief Executive's Response:

The submission is noted.

There are 24 Rural Nodes identified within Level 5 of the Louth Settlement Hierarchy. These Rural Nodes have no or limited water and wastewater infrastructure, services, and facilities. In accordance with national and regional planning policy, the Chief Executive considers that the focus of residential growth should be directed towards the higher-tier settlements, where there is a broader availability of amenities, services, and infrastructure. Rural Nodes are intended to support local communities and their rural hinterlands through limited locally based development rather than accommodate planned population growth.

The lands identified in the submission are not serviced in terms wastewater infrastructure, they would result in urban sprawl, and a portion of the lands are subject to pluvial flooding.

The submission refers to the potential use of Developer Led Infrastructure (DLI) and a serviced-sites model to facilitate development at Reaghstown

A serviced sites initiative in Reaghstown is not considered appropriate. The Chief Executive is unaware of any proposals by Uisce Éireann to provide wastewater treatment in Philipstown therefore any proposal to identify additional lands that would require private wastewater treatment would be considered ad hoc and unsustainable.

Having regard to the aforementioned it is considered that additional lands should not be included within Reaghstown.

Chief Executive's Recommendation:

No change.

Tinure

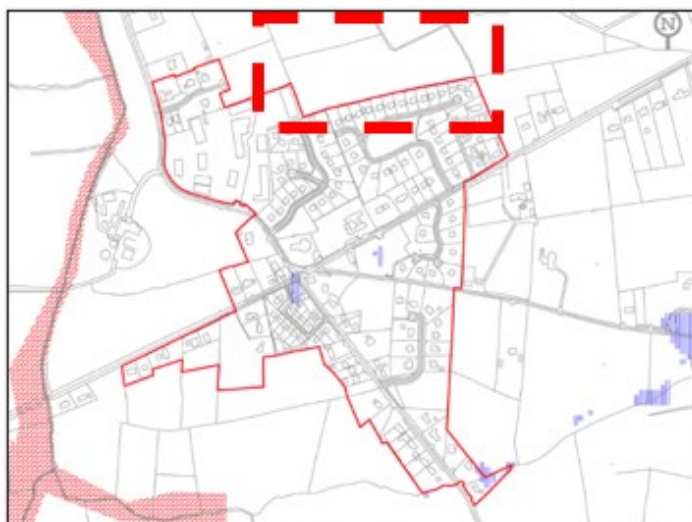
Submission Ref. No.

LH-C208-63

Submitted by:

Leamai Properties Ltd

Maps showing the location of the subject lands:

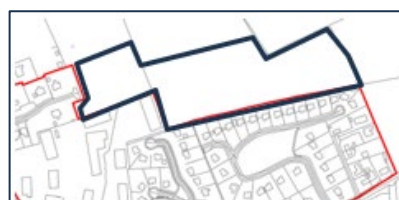


Tinure Settlement Boundary and Flood Zones Map



Map included within the submission

- subject lands outlined in red



Settlement boundary map – subject lands

outlined in black

Summary of Main Issues Raised:

The submission seeks the redesignation of Tinure from a Rural Node to a Level 4 Settlement as part of Variation No. 4 and requests that the settlement be allocated an appropriate level of population and housing growth together with additional residentially zoned lands.

It is submitted that Tinure performs more strongly than a number of existing Level 4 Settlements when assessed against criteria including population, employment, services and facilities, education, accessibility, public transport and water services infrastructure. The submission contends that the current Rural Node designation inappropriately constrains the growth potential of the settlement and limits its ability to contribute towards meeting the housing requirements arising from the Revised National Planning Framework and the Housing Growth Requirements.



In the alternative, should Tinure not be redesignated as a Level 4 Settlement, the submission is seeking an extension to the existing Tinure Rural Node boundary to include the subject lands. It is submitted that Rural Nodes should form part of the Council's response to the Housing Growth Requirement Guidelines and that the additional housing allocation assigned to rural areas should be reflected through the expansion of Rural Nodes. The submission states that the subject lands adjoin the existing settlement boundary, are available for development and could accommodate either residential development or rural needs housing.

Chief Executive's Response:

The submission is noted. However, the Chief Executive does not consider it appropriate to redesignate Tinure from a Rural Node to a Category 4 Settlement through Variation No. 4. The purpose of this Variation is to ensure that sufficient capacity is available within the settlements already identified for residential growth under the Core Strategy having regard to the housing growth requirements arising from the National Planning Framework-First Revision (2025) and associated Section 28 Guidelines.

The assessment undertaken in support of Variation No. 4 did not include a review of the settlement hierarchy and the Chief Executive does not consider it appropriate to introduce new growth settlements or alter the role of existing settlements through this process. Such matters would require a broader review of the Core Strategy, settlement hierarchy and overall development strategy which can be more appropriately completed through a full review of the County Development Plan.

The submission also seeks an extension to the Tinure settlement boundary as an alternative measure. However, Rural Nodes are intended to support local communities and their rural hinterlands through limited locally based development rather than accommodate planned population growth. There are currently constraints at the Tinure Wastewater Treatment Plant, with no projects in place to upgrade same therefore there would be no capacity to serve additional lands in Tinure.

Having regard to the above, it is considered that additional lands should not be included within Tinure.

Chief Executive's Recommendation:

No change.



2.4 Submissions received in relation to General Issues and Chief Executive's Response and Recommendation

Submission Ref. No.	LH-C208-1
Submitted by:	Lisa Corr
Summary of Main Issues Raised:	
The submission supports the Council's consideration of policies that can help address housing need while allowing appropriate, well designed residential development on existing family-owned land. The submission further supports the potential for carefully managed back land development and the provision of small-scale residential units within existing residential curtilages to meet family housing needs, including accommodation for adult children and those wishing to remain in close proximity to relatives. The submission requests that the Council consider the inclusion of policy provisions, having regard to any emerging national or local guidance, in respect of back garden dwellings, modular homes, cabin-style units and similar forms of small-scale residential development. It is noted that any such development should be subject to appropriate standards relating to access, privacy, drainage, wastewater, safety and environmental protection. The submission considers that this approach could support more efficient use of serviced land and contribute to addressing housing supply challenges, while emphasising that proposals should continue to be assessed on their merits to ensure proper planning and sustainable development, including the protection of residential amenity and the surrounding environment.	
Chief Executive's Response:	
The submission is noted. The Chief Executive acknowledges the contribution that backland and small-scale infill development can make to housing supply and compact growth. However, the purpose of Proposed Variation No. 4 is to align the Core Strategy and associated land use zonings with the housing growth requirements of the Revised National Planning Framework and the associated Section 28 Guidelines. While the Variation includes a number of supporting policy objective and amendments to the text of the County Development Plan, its primary purpose is to ensure that sufficient serviced and suitably zoned lands are available to accommodate projected housing growth. The Chief Executive notes the evolving national policy and legislative framework relating to residential development within existing residential curtilages and associated exempted development provisions. These matters are more appropriately addressed through a future review of the County Development Plan.	
Chief Executive's Recommendation:	
No change.	



Submission Ref. No.

LH-C208-7

Submitted by:

Ewan Heaphy

Summary of Main Issues Raised:

Increased residential capacity must be tied with delivery of community infrastructure. Request that the following principles are incorporated into variation:

1. Mandatory Phasing of Neighbourhood Centres.

Large-Scale Residential Developments, the provision of commercial and civic spaces must be phased alongside housing construction.

New communities require immediate access to local convenience retail, childcare, and community spaces to prevent early reliance on private vehicles and avoid creating isolated dormitory estates.

2. Integration of Primary Healthcare Facilities

Existing healthcare infrastructure is under significant pressure. The population growth projected under Variation No. 4 will accelerate this strain. Planning Frameworks must actively reserve or provide dedicated space suitable for General Practitioners pharmacies, and primary care teams.

3. Proposed Policy Recommendation

To require all Large-Scale Residential Developments (LRDs) to demonstrate infrastructure-led growth. The delivery of housing units shall be strictly phased and linked via planning conditions to the concurrent physical delivery of designated neighbourhood centres, childcare provisions, and dedicated medical/primary care spaces.

Chief Executive's Response:

The Chief Executive fully recognises the importance of ensuring that social and community infrastructure is delivered in a timely manner alongside new housing development, thereby supporting the creation of sustainable neighbourhoods.

With regard to health care facilities Policy Objective 39 of Chapter 4 of the Louth County Development Plan 2021–2027 (as varied) seeks to:

“Co-operate with the HSE, other statutory and voluntary agencies, and the private sector in the provision of appropriate healthcare facilities for all sections of the community, subject to proper planning considerations and the principles of sustainable development.”

Each Large-Scale Residential Development (LRD) planning application is assessed on its individual merits, having regard to the relevant policy objectives of the Louth County Development Plan 2021–2027 (as varied), including those relating to the provision of social and community infrastructure. The phasing of development to ensure the requisite social, community and physical infrastructure is delivered in tandem with residential development can be more effectively managed as part of the Development Management process.

Chief Executive's Recommendation:

No change.



Submission Ref. No.	LH-C208-16
Submitted by:	Community Campaigner David Barton
Summary of Main Issues Raised:	
The submission outlines Mr Barton's experience and is supported by a number of appendices. The main themes of the submission are outlined below: <u>Section 1: Design Codes</u> Promote traditional architectural styles in new development, restore and retain historic buildings, prepare stronger design codes based on local character and, support traditional building skills and materials <u>Section 2: Heritage Assets</u> Strengthen protection of designated and non-designated heritage assets, expand local heritage registers, provide funding and incentives for restoration and, encourage community and stakeholder involvement <u>Section 3: Conservation Areas</u> Improve and expand conservation area, retain traditional features and street furniture, simplify heritage consent processes and support authentic restoration works. <u>Section 4 Climate Change</u> Retain existing buildings to reduce carbon emissions, encourage retrofit and reuse rather than demolition, promote biodiversity, tree planting and sustainable development and link heritage conservation with climate action objectives. <u>Section 5: Historic Buildings</u> Protect buildings at risk, encourage restoration and adaptive reuse, reconstruct significant lost historic buildings where feasible and provide financial and technical support for owners. <u>Section 6: Traditional Vernacular Architecture</u> Promote traditional construction methods and layouts, use traditional styles in new housing developments, provide training in heritage skills and, maintain traditional streetscapes and façades <u>Section 7: Making an Application</u> Discourage unnecessary demolition, strengthen enforcement for neglected heritage buildings, improve community consultation, and increase collaboration between councils and heritage groups <u>Section 8: Miscellaneous</u> Support reconstruction of historic buildings, improve infrastructure and public realm works, maintain accessible archives and heritage information and establish registers of buildings at risk.	
Chief Executive's Response:	
The purpose of Proposed Variation No. 4 is to align the Core Strategy and associated land use zonings with the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and the associated Section 28 Guidelines. This Variation seeks to ensure that sufficient capacity is available to accommodate projected housing growth whilst supporting the sustainable development of Level 1-4 settlements across the County.	



The submission advocates a heritage-led planning approach, with a strong emphasis on conserving historic buildings, promoting traditional architecture, reducing demolition, and integrating heritage considerations into future planning policy.

The submission is noted; however, many of the issues raised seek to address issues beyond the scope of this Variation. These issues would be more appropriately considered as part of a Development Plan Review. Accordingly, no change is recommended.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

LH-C208-36

Submitted by:

Cllr. Shane McGuinness

Summary of Main Issues Raised:

The submission highlights the need for additional community zoning and community facilities within Blackrock. It is submitted that the area has experienced significant development and that additional lands should be identified for community purposes. The submission refers to the need for facilities that support recreation, sport, health and wellbeing for all age groups, together with age-friendly housing and accommodation options for older persons wishing to remain within their local community. The submission requests that greater consideration be given to the provision of community-zoned lands to support the future needs of the growing population of Blackrock.

Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges the importance of providing an appropriate range of community, recreational and social infrastructure to support existing and future populations.

However, the primary purpose of Variation No. 4 is to align the Core Strategy and associated land use zonings with the housing growth requirements of the National Planning Framework- First Revision (2025) and the associated Section 28 Guidelines. The variation is focused on ensuring that sufficient residentially zoned land is available to accommodate projected housing growth and does not involve a comprehensive review of community zonings within individual settlements. Whilst it is acknowledged that these matters are important strategic planning considerations, these are more appropriately considered as part of a wider review of the County Development Plan.

The issues raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

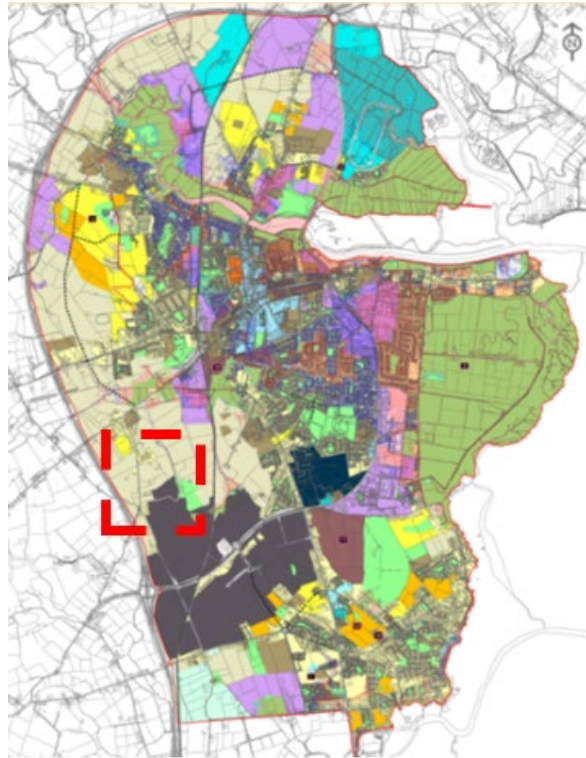
Submission Ref. No.

LH-C208-41

Submitted by:

Dundalk Famine Graveyard Association/ Local resident in the Killally townland

Map showing the location of the subject lands:



Map showing the approximate location of the subject lands.



Summary of Main Issues Raised:

The submission requests that the Council consider the future development and maintenance of the Sidella Greenway as a recreational and heritage amenity. It is proposed that the route be developed as a nature walk, linked to the Dundalk Famine Graveyard and in the future, connected to the adjoining Industrial Development Authority lands and wider area. The submission highlights its recreational, heritage and educational value and requests that the Council engage with relevant landowners to explore opportunities to improve access and connectivity for the benefit of the local community.

Chief Executive's Response:

The submission is noted. The Chief Executive acknowledges the recreational, heritage and amenity value of the Sidella Greenway and the Dundalk Famine Graveyard, together with the benefits that enhanced walking and green infrastructure connections can provide for Dundalk and across the county.

However, the purpose of Proposed Variation No. 4 is to align the County Development Plan with the revised housing growth requirements arising from the National Planning Framework-First Revision (2025) and associated Section 28 Guidelines. The matters raised do not fall within the scope of the proposed variation. However, these matters raised can be reconsidered in the context of a future review of the County Development Plan.

The issues raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

LH-C208-54

Submitted by:

Carolyn Matthews

Summary of Main Issues Raised:

N/A

Chief Executive's Response:

N/A – No information was included with this submission.

Chief Executive's Recommendation:

No change.



Submission Ref. No.	LH-C208-67
Submitted by:	Aiveen Robinson
Summary of Main Issues Raised:	
The submission supports the provision of additional housing in Dundalk and emphasises the importance of climate resilience, infrastructure capacity and environmental sustainability. It highlights the potential impacts of climate change, including flood risk, and requests that future planning decisions are informed by long-term climate resilience considerations. The submission also emphasises the need for supporting infrastructure, including water services, transport, education, healthcare and community facilities, to keep pace with future growth. The submission further supports the integration of green infrastructure, sustainable drainage systems, biodiversity measures and nature-based solutions, together with the delivery of the Dundalk/Blackrock Decarbonising Zone objectives and the protection of heritage assets.	
Chief Executive's Response:	
The Chief Executive notes the submitter's support for the provision of additional housing in Dundalk together with the emphasis placed on climate resilience, infrastructure capacity, flood risk management, green infrastructure and heritage protection. The Chief Executive is satisfied that these matters have been considered through the preparation of Variation No. 4 and are addressed through the policy objectives contained in the Louth County Development Plan 2021-2027 (as varied) and the accompanying environmental assessments. The matters raised do not give rise to any amendment to the Proposed Variation.	
Chief Executive's Recommendation:	
No change.	

Submission Ref. No.	LH-C208-85
Submitted by:	Leah Matthews
Summary of Main Issues Raised:	
The submission is not in relation to any specific location. The submission notes that the area is important for wildlife.	
Chief Executive's Response:	
Having regard to the lack of detail included with the submission it is unclear what 'area' the submitter is referring to. All proposed zonings as part of the Variation have been subject to environmental assessment.	



Any planning applications on the subject lands on which a proposed re-zoning is agreed will be assessed against the County Development Plan, which contains robust policy objectives relating to the protection of wildlife, biodiversity and ecosystems in Chapters 8 – Natural Heritage, Biodiversity and Green infrastructure, Chapter 11 – Environment, Natural Resources and the Coast, Chapter 12 – Climate Action and Chapter 13 – Development Management Guidelines which details the assessment of ecological impact of proposed development.

Chief Executive's Recommendation:

No change.

Submission Ref. No. LH-C208-86

Submitted by: Martin O'Connor

Summary of Main Issues Raised:

The submission is not in relation to any specific location.

The submission notes that the area is important for biodiversity and pollinators.

Chief Executive's Response:

Having regard to the lack of detail included with the submission it is unclear what 'area' the submitter is referring to.

All proposed zonings as part of the Variation have been subject to Environmental Assessment.

Any planning applications on the lands on which a proposed re-zoning is agreed will be assessed against the County Development Plan, which contains robust policy objectives relating to the protection of wildlife, biodiversity and ecosystems in Chapters 8 – Natural Heritage, Biodiversity and Green infrastructure, Chapter 11 – Environment, Natural Resources and the Coast, Chapter 12 – Climate Action and Chapter 13 – Development Management Guidelines which details the assessment of ecological impact of proposed development.

Chief Executive's Recommendation:

No change.

Submission Ref. No. LH-C208-91

Submitted by: Jaki McCarrick

Summary of Main Issues Raised:

The submission raises concerns regarding the approach taken in the preparation of Variation No. 4. It contends that greater emphasis should be placed on communities and community wellbeing and expresses concern regarding the use of the term "settlement".



The submission further raises concerns that housing delivery targets are being prioritised over infrastructure provision and community needs. The submission also raises concerns regarding flood risk, climate resilience, biodiversity protection and the cumulative impacts of additional zoned lands on the environment.

The submission requests greater transparency regarding proposed zoning amendments and seeks justification for such amendments.

The submission further raises concerns regarding the recently approved Mount Avenue development in Dundalk. It is submitted that greater emphasis should be placed on heritage protection, ecological conservation and infrastructure-led development.

Chief Executive's Response:

The submission is noted. The purpose of Variation No. 4 is to align the Core Strategy and associated land use zonings with the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and the associated Section 28 Guidelines. This Variation seeks to ensure that sufficient capacity is available to accommodate projected housing growth whilst supporting the sustainable development of Level 1-4 settlements across the County.

The Chief Executive does not agree that the Variation places the delivery of housing ahead of infrastructure provision, environmental protection or community wellbeing. The Variation has been informed by a Settlement Capacity Audit which assessed lands having regard to their suitability, availability and deliverability. The assessment process considered infrastructure capacity, accessibility, environmental constraints, flood risk, settlement strategy and the overall suitability of lands to accommodate future growth.

The Chief Executive further notes that Variation No. 4 is accompanied by a Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment, all of which assessed the potential environmental impacts of the proposed rezonings. Any future development proposals arising from these zoning amendments will also be subject to detailed assessment through the development management process.

The Chief Executive also acknowledges the concerns raised in relation to heritage, biodiversity and landscape protection. There are existing policy objectives and development management standards contained within the Louth County Development Plan 2021-2027(as varied) which addresses these matters. The Chief Executive remains satisfied that the existing framework provides for their protection.

The submission's observations regarding the Mount Avenue development are noted. However, planning applications are a separate statutory process outside the scope of Variation No. 4. The purpose of Variation No. 4 is to align the Core Strategy and associated land use zonings with the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and the associated Section 28 Guidelines.

Accordingly, the Chief Executive is satisfied that Variation No. 4 provides an appropriate balance between housing delivery, infrastructure provision, environmental protection and the sustainable growth of communities throughout the County.

The matters raised therefore do not give rise to any amendment to the Proposed Variation

Chief Executive's Recommendation:

No change.



Submission Ref. No.

LH-C208-110

Submitted by:

Hermione Duffy

Summary of Main Issues Raised:

The submission raises concerns regarding the cumulative impact of recent residential development in Blackrock and contends that existing infrastructure and community facilities are under increasing pressure. Reference is made to water services, traffic congestion, school capacity and the availability of sports and recreational facilities.

The submission requests that consideration be given to lands currently zoned A3 and argues that future development should be delivered at lower densities. The submission also highlights the need for additional community, leisure and sporting facilities within Blackrock and suggests that lands should be identified for G1 Community Facilities zoning to accommodate uses such as sports pitches, courts, clubs, community facilities and care-related development.

Chief Executive's Response:

The submission is noted. However, the purpose of Variation No. 4 is to align the Core Strategy and associated zonings with the revised housing growth requirements arising from the National Planning Framework- First Revision (2025) and associated Section 28 Guidelines. In this regard, the Variation focuses on identifying lands required to accommodate revised housing allocations and does not undertake a comprehensive review of existing residential zoning, density standards or the wider community and recreational zonings within individual settlements.

Whilst the matters raised are acknowledged, they would be more appropriately considered as part of a wider review of the County Development Plan, where the overall land use strategy can be assessed in a comprehensive and cohesive manner.

The matters raised therefore do not give rise to any amendment to the Proposed Variation.

Chief Executive's Recommendation:

No change.

Submission Ref. No.

LH-C208-119

Submitted by:

Drogheda City Status Group

Summary of Main Issues Raised:

Introduction

Support for proposed Variation No. 4 and its alignment with the revised National Planning Framework and updated housing requirements. However, continuing to consider Drogheda within County Louth's administrative boundaries, limits its growth across both Louth and Meath.

1. Revised Housing Allocation Recognises Drogheda's Wider Regional Role



The allocation of 3,518 additional dwellings to Drogheda, is equal to the allocation for Dundalk despite Drogheda having a smaller administrative population within County Louth, acknowledges Drogheda's wider functional role. Drogheda serves communities in both Louth and Meath and forms a key part of the Dublin-Belfast Economic Corridor. As such, future planning should recognise Drogheda as a cross-boundary Regional Growth Centre and explicitly acknowledge the need for coordinated planning with Meath County Council. The Variation reinforces the need for a Joint Urban Area Plan.

Recommendation: Text should acknowledge that Drogheda's revised housing allocation reflects its wider functional urban role as a cross-boundary Regional Growth Centre, not merely a Louth settlement.

2. The Variation Reinforces the Need for the Joint Urban Area Plan

The incorporation of amendments arising from the Dundalk Local Area Plan demonstrates the benefits of a contemporary planning framework for a Regional Growth Centre. As Drogheda grows, planning must increasingly integrate housing, employment, transport, regeneration, community infrastructure, climate resilience and placemaking across the entire urban area. The revised housing allocations strengthen the case for progressing the Joint Urban Area Plan.

Recommendation: Louth County Council should reaffirm its commitment, in partnership with Meath County Council, to the early preparation of the Drogheda Joint Urban Area Plan.

3. Planning Must Move Beyond Housing Numbers

Variation No. 4 successfully identifies where future housing growth can be accommodated but planning must now focus on the type of urban environment being created. Strong housing delivery figures in Drogheda demonstrates that growth is already occurring at scale. Consequently, future planning should prioritise placemaking and urban quality, including brownfield regeneration, compact neighbourhoods, mixed-use development, sustainable transport, high-quality public realm, green infrastructure, community facilities and enhanced employment opportunities. These elements are essential for creating a successful regional city.

Recommendation: The Variation should explicitly recognise that future planning priorities for Drogheda will increasingly focus on placemaking, regeneration, urban quality and integrated growth alongside continued housing delivery.

4. Ensure the Long-Term Strategic Opportunity Area Is Guided by a Comprehensive Masterplan

The designation of the Long-Term Strategic Opportunity Area north of the PANCR is one of the most significant elements of the Variation. The area should not be treated as just a housing reserve. Instead, it should be planned as a complete urban neighbourhood under a comprehensive masterplan. This framework should address development phasing, infrastructure delivery, transport integration, community facilities, employment provision, biodiversity, green infrastructure and urban design.

Recommendation: The Variation should state that the area will only be developed through such a comprehensive planning framework linked to the future Joint Urban Area Plan.

5. Maintain a Balanced Relationship Between Housing and Employment

The submission notes that the Variation proposes the rezoning of three employment sites to residential use, c. 2.72 hectares. It is stated that these could be justified on the basis of compact growth objectives, however accompanying documentation should demonstrate the loss of employment land has been assessed against Drogheda's long-term employment needs. As outward commuting remains high, maintaining an appropriate balance between residential growth and local employment opportunities is critical for economic sustainability, reducing commuting and strengthening Drogheda's role as a self-sustaining urban centre.



Recommendation: Confirm within the Variation that the loss of approximately 2.72 hectares of E1 employment land has been assessed against Drogheda's long-term employment land strategy.

6. Recognise That Drogheda Is Entering a New Stage of Development

The revised housing allocations, additional residential zoning and the identification of strategic growth lands collectively indicate that Drogheda has entered a new phase of development. The key challenge is to ensure growth is managed. Future planning should prioritise quality over quantity, regeneration before expansion, accessibility over car dependency, integrated transport, mixed-use neighbourhoods, public realm improvements, civic identity and economic resilience. While the Variation updates housing figures, the submission suggests it does not adequately address broader issues such as governance, transport coordination and cross-county planning arrangements necessary for a city-scale urban area.

Conclusion

Proposed Variation No. 4 appropriately responds to revised national policy and population projections and provides sufficient land to accommodate growth. However, Drogheda has reached a critical stage in its evolution where the focus should shift from simply managing growth to shaping a successful city-scale urban place. The Joint Urban Area Plan is identified as the key opportunity to integrate housing, employment, transport, regeneration, placemaking, community facilities and environmental quality into a coherent long-term vision for Drogheda.

Chief Executive's Response:

The submission is noted.

1. Revised Housing Allocation Recognises Drogheda's Wider Regional Role

The housing allocations for Drogheda and Dundalk reflect their designation as Regional Growth Centres under both the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midland Region, as well as the continued development pressures experienced in both settlements.

The Chief Executive is fully aware of the importance of adopting a coordinated approach to the future development of Drogheda, which straddles the administrative boundaries of Counties Louth and Meath. Accordingly, the Council remains fully committed to continue to work in partnership with Meath County Council to deliver an integrated strategy for the sustainable and coordinated development of the town.

2. The Variation Reinforces the Need for the Joint Urban Area Plan

As a point of clarity Variation No.3 updated the Louth County Development Plan 2021-2027 to take account of the Dundalk Local Area Plan.

As indicated in the preceding paragraphs Louth County Council are committed to working with Meath County Council on the preparation of a Joint Plan for Drogheda.

3. Planning Must Move Beyond Housing Numbers

The Louth County Development Plan 2021-2027(as varied) contains a range of policy objectives that support the provision of community facilities in tandem with housing development and prioritise brownfield and infill development in line with compact growth principles. The Chief Executive recognises the importance of creating a sustainable, high-quality and climate-resilient urban environment and is committed to fostering the development of sustainable 10-minute neighbourhoods that promote healthy, inclusive and resilient communities. These principles, together with a strong focus on placemaking, sustainable mobility, climate action and quality of life, will form a central theme of any future strategy for Drogheda.



4. **Ensure the Long-Term Strategic Opportunity Area Is Guided by a Comprehensive Masterplan**

The Long-Term Strategic Opportunity Area will be guided by a comprehensive masterplan to ensure the coordinated and sustainable development of the area. As part of this process, a detailed assessment of the capacity of existing social and physical infrastructure, including schools, community facilities, recreational amenities, neighbourhood services, energy infrastructure, transport networks, water services and wastewater infrastructure, will be undertaken to identify any existing deficits and determine future investment and upgrade requirements.

The masterplan will also be informed by an integrated transport planning approach, ensuring that future development is supported by sustainable mobility measures, including public transport, walking and cycling infrastructure, and the principles of compact growth and 10-minute neighbourhoods.

5. **Maintain a Balanced Relationship Between Housing and Employment**

The Louth County Development Plan 2021-2027 contains a range of policy objectives that support and facilitate the delivery of employment opportunities throughout the County, including within Drogheda.

The Chief Executive recognises the importance of maintaining a strong balance between housing and employment provision and continues to support and promote economic development and job creation within Drogheda. Under the Louth County Development Plan 2021-2027, approximately 230 hectares of land are zoned for employment uses within Drogheda and available for development, providing significant capacity to accommodate future employment growth.

Given that the proposed rezoning relates to a relatively small area of land and represents only a minor proportion of the overall employment lands available within the settlement, it is not considered necessary to undertake a separate assessment or justification of its impact on the town's long-term employment land supply. The Chief Executive is satisfied that sufficient employment-zoned lands remain available to support future economic growth and investment within Drogheda.

6. **Recognise That Drogheda Is Entering a New Stage of Development**

The Chief Executive concurs that the focus of future planning should extend beyond simply accommodating housing growth and should instead prioritise the creation of sustainable, well-connected and vibrant communities. While matters relating to governance and administrative arrangements fall outside the scope of this Variation, the Chief Executive recognises the importance of adopting a coordinated approach to the future development of Drogheda and is committed to advancing integrated transport planning and the preparation of an overarching strategy to guide development.

Chief Executive's Recommendation:

No change.



3. Appendix One – List of Submissions Received

A total of 162 submissions were received by Louth County Council in relation to Proposed Variation No. 4 of the Louth County Development Plan 2021-2027 (as varied). Two submissions were subsequently withdrawn. The submissions are detailed in Table No. 1 hereunder:

Table No. 1 – List of Submissions Received

	Submission Reference	Name	Page on Chief Executive Report
1	<u>LH-C208-1</u>	Lisa Corr	197
2	<u>LH-C208-2</u>	Nicola Bishop	55
3	<u>LH-C208-3</u>	Stephanie McArdle (Kent)	55
4	<u>LH-C208-4</u>	Deidre Mac Dermot	55
5	<u>LH-C208-5</u>	Yohan Riou	55
6	<u>LH-C208-6</u>	Ghazzali Ahmed	55
7	<u>LH-C208-7</u>	Ewan Heaphy	198
8	<u>LH-C208-8</u>	Noeleen Ahmed	55
9	<u>LH-C208-9</u>	Tara Tine	93
10	<u>LH-C208-10</u>	John O'Reilly	55
11	<u>LH-C208-11</u>	Louise Shaw	55
12	<u>LH-C208-12</u>	Niall McCourt	55
13	<u>LH-C208-13</u>	Sonya McEneaney	55
14	<u>LH-C208-14</u>	Aidan McCarron	142
15	<u>LH-C208-15</u>	Jimmy Flynn	60
16	<u>LH-C208-16</u>	Community Campaigner David Barton	199
17	<u>LH-C208-17</u>	Genesis Planning Consultants on behalf of Rosemount Homes & Arabtec Capital Group	112
18	<u>LH-C208-18</u>	Fintan McCaffrey	60
19	<u>LH-C208-19</u>	Ceinwen Fergus	60
20	<u>LH-C208-20</u>	Transport Infrastructure Ireland	16
21	<u>LH-C208-21</u>	John Agnew	60
22	<u>LH-C208-22</u>	V P Mathews Developments Limited	115



	Submission Reference	Name	Page on Chief Executive Report
23	LH-C208-23	Inland Fisheries Ireland	34
24	LH-C208-24	Deborah Hoey	60
25	LH-C208-25	Ceinwen Fergus	60
26	LH-C208-26	Enda Bergin	60
27	LH-C208-27	Ewan Heaphy	117
28	LH-C208-28	Submission Withdrawn	-
29	LH-C208-29	Bill Baldwin	62
30	LH-C208-30	Brian O'Donoghue	60
31	LH-C208-31	Gerard Coleman	60
32	LH-C208-32	Genesis Planning Consultants on behalf of IJM Timber Engineering Ltd	64
33	LH-C208-33	Department for Infrastructure	34
34	LH-C208-34	Genesis Planning Consultants on behalf of PJ & EJ Doherty Ltd	39
35	LH-C208-35	Environmental Protection Agency	35
36	LH-C208-36	Cllr. Shane Mc Guinness	200
37	LH-C208-37	Justyna O'Reilly	60
38	LH-C208-38	Darragh O'Reilly	60
39	LH-C208-39	Cllr Shane Mc Guinness	55
40	LH-C208-40	Dubhaltach Mulvenna	55
41	LH-C208-41	Dundalk Famine Graveyard Association/ Local resident in the Killally townland	201
42	LH-C208-42	Dolores Haigh Hadfield	174
43	LH-C208-43	Health and Safety Authority (HSA)	36
44	LH-C208-44	Seamus Fallon	66
45	LH-C208-45	Cait Monagher	60
46	LH-C208-46	Annette MhicArdaíl	60
47	LH-C208-47	Uisce Éireann	24
48	LH-C208-48	Willow Grove Residents Association	60



	Submission Reference	Name	Page on Chief Executive Report
49	LH-C208-49	CBRE Advisory (IRL) Ltd on behalf of Glen Dimplex Ireland	133
50	LH-C208-50	Michael Cunningham	41
51	LH-C208-51	Una Cleary	55
52	LH-C208-52	Fiona Mullen	60
53	LH-C208-53	Mary Murray	60
54	LH-C208-54	Carolyn Matthews (void)	202
55	LH-C208-55	Olwen Matthews	60
56	LH-C208-56	Nuala Mullen	60
57	LH-C208-57	Planning Solutions	119
58	LH-C208-58	Steven Peck Chartered Town Planners on behalf of Daragh King	183
59	LH-C208-59	Genesis Planning Consultants on behalf of Boyne Ventures Ltd	166
60	LH-C208-60	Steven Peck Chartered Town Planners on behalf of Niall Keenan and Thomas Keenan	187
61	LH-C208-61	Steven Peck Chartered Town Planners on behalf of Alltec Fibre Ltd and Elizabeth Keenan	189
62	LH-C208-62	Alltec Fibre Ltd	185
63	LH-C208-63	Leamai Properties Ltd	195
64	LH-C208-64	Calmot Ventures Limited	168
65	LH-C208-65	Clermont Park Enterprises Partnership	180
66	LH-C208-66	Dermot Breen	68
67	LH-C208-67	Aiveen Robinson	203
68	LH-C208-68	Genesis Planning Consultants on behalf of Hollywood Developments Ltd	175
69	LH-C208-69	Office of Public Works	21
70	LH-C208-70	Fiona Henry	60
71	LH-C208-71	Brendan Ryder	60
72	LH-C208-72	Stephen Ward Town Planning and Development Consultants on behalf of Michael Gregory	134



	Submission Reference	Name	Page on Chief Executive Report
73	LH-C208-73	David Byrne	60
74	LH-C208-74	Clara Kumagai	60
75	LH-C208-75	Niamh Moran	60
76	LH-C208-76	Frank Lynch	128
77	LH-C208-77	Peter Farren	60
78	LH-C208-78	Department of Education and Youth	30
79	LH-C208-79	RMLA Planning Consultants on behalf of Tesco Ireland Limited	95
80	LH-C208-80	MKO Planning and Environmental Consultants on behalf of Philomena Kirk	70
81	LH-C208-81	Brady Hughes Consulting on behalf Andrew Purcell and Des Campbell	148
82	LH-C208-82	Brady Hughes Consulting on behalf of Eugene Matthews	137
83	LH-C208-83	Therese O Rourke	60
84	LH-C208-84	Finnegan Jackson Building Surveyors Limited on behalf of Tom Durnin	193
85	LH-C208-85	Leah Matthews	203
86	LH-C208-86	Martin O'Connor	204
87	LH-C208-87	Lisa O'Hagan	72
88	LH-C208-88	Emer Brennan	55
89	LH-C208-89	Sinead Gordon	60
90	LH-C208-90	Colette Brennan	55
91	LH-C208-91	Jaki McCarrick	204
92	LH-C208-92	Colette Brennan	55
93	LH-C208-93	Claire Brigid Byrne	60
94	LH-C208-94	Brady Hughes Consulting on behalf of Apolloseven Properties One Ltd	43
95	LH-C208-95	Brady Hughes Consulting on behalf of Tom Condon	169
96	LH-C208-96	Brady Hughes Consulting on behalf of The Callan Family	97
97	LH-C208-97	Colin Lloyd	60



	Submission Reference	Name	Page on Chief Executive Report
98	LH-C208-98	Stephen Ward Town Planning & Development Consultants Ltd on behalf of Agrio Limited	159
99	LH-C208-99	Stephen Ward Town Planning & Development Consultants Ltd on behalf of Dundalk Grammar School	74
100	LH-C208-100	Brady Hughes Consulting on behalf of The Hartigan Family	161
101	LH-C208-101	Stephen Ward Town Planning & Development Consultants Ltd on behalf of E Fallon	177
102	LH-C208-102	Seamus Rogers	130
103	LH-C208-103	National Transport Agency	18
104	LH-C208-104	Submission Withdrawn	-
105	LH-C208-105	Brady Hughes Consulting	99
106	LH-C208-106	ESB	33
107	LH-C208-107	Brady Hughes Consulting on behalf of Lorrac Developments	191
108	LH-C208-108	Brady Hughes Consulting on behalf of The Smith Family	150
109	LH-C208-109	JSA Planning on behalf of LAJONA Limited	76
110	LH-C208-110	Hermione Duffy	206
111	LH-C208-111	Brady Hughes Consulting on behalf of Olan McNeece	163
112	LH-C208-112	Brady Hughes Consulting on behalf of Flaxton Commercial Ltd	44
113	LH-C208-113	Mary Mullen	55
114	LH-C208-114	Comma Architects and Genesis Planning Consultants on behalf of Peal Developments Ltd	139
115	LH-C208-115	CSR Land Planning and Design on behalf of Donal Carroll	178
116	LH-C208-116	Mary Mullen	55
117	LH-C208-117	Mary Mullen	55
118	LH-C208-118	Brady Hughes Consulting on behalf of Propchain Solutions, Conn Sands and Imelda Sands	105



	Submission Reference	Name	Page on Chief Executive Report
119	<u>LH-C208-119</u>	Drogheda City Status Group	206
120	<u>LH-C208-120</u>	Hughes Planning & Development Consultants on behalf of J Murphy Development Ltd and Ravala Ltd	152
121	<u>LH-C208-121</u>	Brady Hughes Consulting on behalf of Barney Flannery	46
122	<u>LH-C208-122</u>	Patrick Andrews	55
123	<u>LH-C208-123</u>	Office of The Planning Regulator	7
124	<u>LH-C208-124</u>	Carol Hoey	60
125	<u>LH-C208-125</u>	Coakley O'Neill Town Planning on behalf of Tony Coffey CPS Ireland Ltd	171
126	<u>LH-C208-126</u>	Hughes Planning & Development Consultants on behalf of J Murphy Developments Ltd and Ravala Ltd	48
127	<u>LH-C208-127</u>	JSA Planning on behalf of LJW Properties	123
128	<u>LH-C208-128</u>	Stephen Ward Town Planning & Development Consultants Ltd on behalf of Conor McArdle & Tom Quigley	80
129	<u>LH-C208-129</u>	Aideen McCormack	60
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137	<u>LH-C208-137</u>	Stephen Little & Associates on behalf of Castlethorn	109
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144	<u>LH-C208-144</u>	Ray Kenny	60
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146	<u>LH-C208-146</u>	Stephen Ward Planning & Development Consultants on behalf of B.N & B Carroll	88
147	<u>LH-C208-147</u>	Brenda Brennan	55
148	<u>LH-C208-148</u>	Shirley O Hanlon	60
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4. Appendix Two— Previous Variations to the Louth County Development Plan 2021-2027

This is the fourth Proposed Variation to the Louth County Development Plan 2021-2027.

Variation No. 1

Variation No. 1 was proposed for the following reasons:

1. To update the County Development Plan to take account of the methodology and housing projections as set out in the Section 28 Guidelines 'Housing Supply Target Methodology for Development Planning' and the 'Projected Housing Demand by Local Authority Area 2020-2031 – ESRI NPF Scenario Housing Supply Target' provided by the Department of Housing, Local Government and Heritage in December 2020. This will ensure that the housing provision in the Development Plan is consistent with, and aligned with, national and regional policy.
2. To update the County Development Plan to ensure it is consistent with Part V of the Planning and Development Act as amended by the Affordable Housing Act 2021.

Variation No.1 to the Louth County Development Plan 2021-2027 was adopted on the 18th July 2022.

Variation No. 2

Variation No. 2 was proposed for the following reasons:

1. To update the County Development Plan to take account of the Guidelines 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' published by the Department of Housing, Local Government and Heritage in January 2024 and issued under Section 28 of the Planning and Development Act 2000 (as amended).

Section 28 provides that planning authorities shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended), in the performance of their functions.

Variation No. 2 to the Louth County Development Plan 2021-2027 was adopted on the 20th of May 2024.

Variation No. 3

The reason for Variation No. 3 was proposed for the following reasons:

To take account of the Dundalk Local Area Plan 2025-2031, as adopted on 6th March 2025 and to ensure consistency between the Plans.



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