

10th September 2024

Forward Planning Section,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co Louth,
A91 W20C

Re: Draft Dundalk Local Area Plan 2024-2030

A chara,

Thank you for your authority's work on preparing the Draft Dundalk Local Area Plan 2024-2030 (the draft LAP).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft LAP.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft LAP under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the Louth County Development Plan 2021-2027 (the County Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly 2019-2031, and relevant section 28 guidelines. This submission makes eight (8) recommendations and six (6) observations.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the Planning Authority is

required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The Planning Authority is requested by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The Planning Authority is requested by the Office to give full consideration to the advice contained in a submission.

Overview

The Office welcomes the preparation of the draft LAP, having regard to the statutory requirements under section 19 of the Act.

Dundalk is identified as a Regional Growth Centre under the RSES and the draft LAP will play an important role in achieving a high level of self-sustaining employment and service provision to act as a regional economic driver and play a significant role for the wider catchment area.

The settlement has benefited from significant public investment in public realm, water and road infrastructure and it is therefore critical that the full benefits of this investment are realised, providing for socially and environmentally sustainable growth and a high quality urban environment for residents, workers, visitors and Dundalk Institute of Technology (DkIT).

In this respect, the Office welcomes the selection of the Mount Avenue lands as the '*settlement consolidation site*'. The development of these lands consolidates the town, and positively leverages the funding received for the Mount Avenue Link Road under the Local Housing Infrastructure Activation Fund by reducing the delivery cost of new homes and improving connections.

The inclusion of a Masterplan for Mullagharlin within the draft LAP, and placing it on a statutory footing, as requested by the Office during the making of the County Development

Plan is also welcomed. As is the designation of the Key Development Areas for new residential development.

Dundalk is one of the principal locations for employment in Louth and accounts for c. 40% of the total jobs in the County. The RSES places a strong emphasis on the enhancing Dundalk’s role as ‘*strategic employment centre on the Dublin – Belfast Economic Corridor*’ and this vision is translated into the draft Plan in terms of the quantum of zoned economic/employment lands.

The interactive zoning and flood maps on the Planning Authority’s website are commended.

The recommendations and observations below largely focus on supporting the delivery of the vision for the draft LAP, building on the ambition of the RSES and the Louth Development Plan, including: clarifying the settlement strategy; co-ordinating infrastructure delivery and economic development; integrating transport and land-use planning; and providing effective monitoring and implementation of the Plan.

It is within this context the submission below sets out eight recommendations and six observations under the following themes:

Key theme	Recommendation	Observation
Consistency with Regional, Spatial and Economic Strategy	-	-
Consistency with Development Plan and Core Strategy	Recommendation 1	-
Residential Development Strategy	Recommendation 2 Recommendation 3	Observation 1
Transport and Accessibility	Recommendation 4	-
Economic Development and Employment	Recommendations 5	Observation 2 Observation 3
Education, Social and Community Amenities	Recommendation 6	-
Infrastructure (SUDS, Green and Blue)	Recommendation 7	-

Flood Risk Management	Recommendation 8	
Climate Action	-	Observation 4
Environment, Natural and Built Heritage	-	Observation 5
Implementation and Monitoring	-	Observation 6

1. Consistency with the Regional, Spatial and Economic Strategy

Section 19(2) of the Act requires that local area plans are consistent with any RSES that applies to the area of the plan.

The RSES recognises the importance of Dundalk, a Regional Growth Centre with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wider catchment area.

Dundalk is identified as one of the fastest growing towns in the country, with the potential to form part of a sustainable network of urban centres of scale, including Newry, connected by public transport within the region and within the Dublin – Belfast Economic Corridor.

The key priority of the RSES is to promote the continued sustainable and compact growth of Dundalk as a regional driver of city scale with a target population of 50,000 by 2031.

RPO 4.19 of RSES requires that an Urban Area Plan (UAP) is prepared for Dundalk. However, as there currently is no legislation that expressly provides for UAPs this plan is being prepared as a LAP, and this approach is accepted by the Office.

2. Consistency with Development Plan and Core Strategy

Section 19(2) of the Act requires a local area plan to be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act. The Guidance Note on Core Strategies (2010) also state that the population targets and housing requirements of lower-level plans must be consistent with the core strategy of the County Development Plan.

The Office considers that the overall approach in the draft LAP, which promotes sequential development and regeneration within the central area, is generally consistent with the strategic objectives (section 1.6.1), Policy Objective CS 10 and the core strategy (Table 2.15) of the County Development Plan.

The Office notes that the population and housing targets have been extrapolated forward as the lifetime of the LAP will be up to 2030, beyond that set out in the core strategy of the County Development Plan. The population projection for Dundalk in 2030 is 49,166 persons and 2,448 new housing units are required for the lifespan of the LAP (2024-2030).

The Office considers the population and housing targets of the draft LAP to be generally consistent with the County Development Plan and its core strategy, and with the longer term population target set out in the RSES. However, these figures should be included as a new column in Table 2.2 and Table 2.3 for clarity.

The Office welcomes the preparation of the Settlement Capacity Audit (SCA) included in Appendix 1 of the draft LAP. Further details regarding site areas, densities (having regard to the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) and estimates of housing yield should however be provided having regard to Appendix A of the Development Plans, Guidelines for Planning Authorities (2022) (Development Plan Guidelines). This would provide greater clarity for infrastructure providers, the community and developers.

The Office also welcomes the identification of potential infill opportunities, including lands zoned A1 to the east of the town centre (i.e. lands on Red Barns Road and Point Road). The draft LAP has a key role in activating and promoting residential development in areas close to the town centre in accordance with compact and sustainable growth and Policy Objective CS 10 and Policy Objective CS 11 of the County Development Plan. In this regard, greater clarity and transparency is required in relation to the potential housing yield from Existing Residential (A1) and Mixed Use zoned land with residential development potential.

Recommendation 1 - Consistency with Development Plan and Core Strategy

Having regard to the compact and sustainable growth of the town and continued support for the town centre, and in particular to:

- the core strategy of the Louth County Development Plan 2021-2027 (County Development Plan);
- the targets for compact growth under Objectives CS 10 and Policy Objective CS 11 of the County Development Plan and RPO 3.2 of the RSES;

- Policy Objective 3.1 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) to achieve appropriate densities that respond to place contexts;
- Appendix A of the Development Plans, Guidelines for Planning Authorities (2022); and
- Town Centre First: A Policy Approach for Irish Towns (2022),

the Planning Authority is required to:

- provide a clear core strategy table which sets out: population and housing growth; the area (ha) of land zoned New Residential (A2 and A3 zonings), Existing Residential and Mixed Use land with residential development potential; and the housing yield from such lands, including Existing Residential and Mixed Use, using density standards consistent with the Compact Settlements Guidelines; and
- amend section 2.3 of the draft LAP and the Settlement Consolidation Audit (Appendix 1) accordingly.

3. Residential Development Strategy

This draft LAP will be critical to Dundalk realising its full potential as a self-sustaining Regional Growth Centre through the provision of a clear development strategy for the town.

While the Office welcomes the identification and designation of key settlement consolidation sites, key development areas, character areas, masterplan areas and spot objectives, improved focus could be provided in terms of identifying priorities and providing a greater focus for implementation. This will be particularly important in terms of achieving compact growth, regeneration, and invest in infrastructure.

In this respect, the Office considers that the draft LAP would benefit from clearly setting out the overall development hierarchy and phasing of infrastructure requirements. The draft LAP should also have greater regard to section 4.2 of the Compact Settlements Guidelines and section 5 of the Local Area Plans, Guidelines for Planning Authorities (2013) (LAP Guidelines) on the level of detail for these development areas. For example, in text and graphic form, on the overall design and layout of the area, the amenities and services

needed to support the development and a phasing strategy for the delivery of infrastructure (if required) ¹.

In addition, while the draft LAP prioritises the continued rejuvenation of the town centre by placing a strong emphasis on directing development towards the urban core of the town, there is no specific policy objective targeting the town centre sites consistent with the RSES to prioritise the revitalisation and redevelopment of Dundalk town centre and the need to target the underutilised areas for regeneration and place making.

In relation to the development of the Mount Avenue Area, which has the capacity to deliver c. 1,600 new residential units, a proposed masterplan will be critical to the realisation of this objective in a sustainable manner that creates a high quality environment for future residents. The Office therefore considers that a specific policy objective in the draft LAP to prepare a masterplan should be included to provide clarity for both developers and the local community and infrastructure providers.

The Office also notes that there are a number of discrepancies regarding the exact site boundary, development area and quantum of housing this development site can generate. For example, Map 2.1 and section 2.4.3 identify two parcels of land and state the development area is 45.5ha; whereas section 3.2.1 states the development area is 35ha and also states it is 55.13ha.

The draft LAP also states that the lands at Raynoldstown Village have the capacity to deliver c. 1,450 units. In addition, the draft LAP requires the completion of a community centre within the development and available for use prior to '*no more than 800 units in Raynoldstown Village being occupied*'. Clarity is required if this requirement includes or excludes the existing 600 units.

¹ Graphics and maps could be similar to the Strategic Development and Regeneration Area maps in the Dublin City Council Development Plan 2022-2028

Recommendation 2 – Residential Development Strategy

Having regard to the compact and sustainable growth of Dundalk, the co-ordination of the housing and infrastructure delivery and to support the implementation and monitoring of the LAP, and in particular to:

- RPO 3.2 and the regeneration aims for Dundalk of the RSES; and
- section 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) and section 5 of the Local Area Plan Guidelines (2013);
- Policy Objectives CS 1, CS 2 and CS 10 of the Louth County Development Plan 2021-2027

the Planning Authority is required to:

- (i) set out an overall development hierarchy and phasing of infrastructure requirements for the key settlement consolidation sites, key development areas, character areas, masterplan areas and spot objectives, and in particular for the Mount Avenue and Raynoldstown key development areas;
- (ii) provide a specific policy objective targeting the town centre sites to deliver compact growth, and
- (iii) provide a specific policy objective to prepare the Mount Avenue Masterplan.

Observation 1 – Residential Development and Compact Growth

In the interests of clarity and having regard to:

- section 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines); and
- section 5 of the Local Area Plan Guidelines (2013),

the Planning Authority is requested to:

- (i) set out the development hierarchy for Dundalk at the start of Chapter 3;
- (ii) review the development boundary and potential housing yield for Mount Avenue which is identified as a Settlement Consolidation Site, a masterplan area and a Key Development Area, and amend accordingly throughout the draft LAP;
- (iii) utilise additional maps and graphics to set out the design intent for the development areas; and
- (iv) clarify the potential housing yield for Raynoldstown Village and if this includes or excludes the existing 600 housing units.

3.1 Densities and Heights

Table 2.5 (and repeated at Table 5.2) set out the density that underpins the draft LAP's development strategy as 35 units per ha for suburban areas / urban extensions, and 50 units per ha for town centre and urban neighbourhood locations.

However, these are the minimum standards as per Table 3.4 of the Compact Settlements Guidelines for Regional Growth Centres. Policy Objective 3.1 of these Guidelines recommends that density ranges are applied and refined based on consideration of centrality and accessibility to services and public transport and considerations of character, amenity and the natural environment. A recommendation to refine the densities and include the lower and upper density ranges for Regional Growth Centres is therefore included below.

The County Development Plan supports increased building heights in appropriate location in the Regional Growth Centre of Dundalk (Policy Objective HOU 16) and section 2.14.3 states a more detailed analysis of the preferred location for taller buildings will be carried out as part of the UAP for Dundalk. The draft LAP states a '*building of height is considered to be a building that is 4 storeys or higher*'.

Table 5.1 of the draft LAP sets out the areas suitable for buildings of height in Dundalk, including lands along the Ramparts and in the Marshes area; lands along the waterfront; public transport hubs and the Mullagharlin Employment zone. The Office considers that these areas are generally appropriate, however in order to provide greater clarity, the Planning Authority should provide a map in tandem with Table 5.1 to '*explicitly identify*,

through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development...' as per SPPR no. 1 of the Urban Development and Building Heights, Guidelines for Planning Authorities (2018) (Building Heights Guidelines).

The Office also requests the Planning Authority to review the density and height provisions in Chapter 2 (Development Strategy) and Chapter 5 (Sustainable Neighbourhoods and Communities) to ensure consistency across the LAP (for example within the development management process where buildings of height in the town are acceptable).

Recommendation 3 – Height and Density Strategy

Having regard to:

- RPO 3.3 of the RSES to ensure density standards consistent with section 28 Guidelines;
- Policy Objective 3.1 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) to achieve appropriate densities that respond to place contexts;
- SPPR 1 of the Urban Development and Building Heights, Guidelines for Planning Authorities (2018) (Building Heights Guidelines); and
- Policy Objective HOU 16 and Table 3.1 of the Louth County Development Plan 2021-2027,

the Planning Authority is required to:

- (i) review the density ranges and refine the densities as per Policy Objective 3.1 of the Compact Settlements Guidelines, and
- (ii) provide a map illustrating the locations suitable for buildings of height as per SPPR 1 of the Building Heights Guidelines.

4. Transport and Accessibility

The Office welcomes the preparation of the Local Transport Plan (LTP), as required by the RSES and Policy Objective MOV 5 of the County Development Plan to ensure the integration of land use and transport planning, setting out the transport priorities for the plan area.

A significant shift to active and sustainable modes will be necessary to enable Ireland to achieve its mandatory climate action targets under the Climate Action and Low Carbon Act 2015, as amended, that is, to reduce greenhouse gas (GHG) emissions by 51% by 2040, with a commitment to achieving carbon neutrality by 2050. Having clear modal shift ambitions will be important to achieving these targets which is supported by Policy Objective MOV 8 of the County Development Plan:

To set modal share targets in each new Local Area Plan in co-operation with the NTA, CARO, EMRA and other relevant stakeholders in accordance with any relevant Guidelines or targets published during the life of this Plan.

As such, it will be important to set ambitious but realistic targets for Dundalk in consultation with relevant stakeholders, and to include these within the draft LAP to assist in appropriate implementation and monitoring of the LAP. However, the Office notes that no targets are included in the draft LAP.

The Office welcomes the identification of active travel related measures in the LTP. However, a greater focus could be provided on: (a) prioritising the specific connectivity and active travel requirements of the key development areas identified in section 3.2 and the economic investment and employment generating uses identified in section 6.6.1 of the draft LAP; and (b) setting out their implementation timeframes.

The LTP notes there is lack of pedestrian and cycle access points into the train station, with access only available via Carrickmacross Road to the south of the station. Given the importance of the Dundalk Clarke train station to the town and the region, the Office welcomes the action to seek active travel access on the north side, connecting to Pearse Park. Connections from the west (i.e. Árd Easmuinn) should also be provided.

The Office welcomes the inclusion of Policy Objective MOV 25 to reorganise car parking spaces in the town. In tandem, Policy Objective MOV 11 encourages the provision of secure bike parking facilities. In light of the LTP findings regarding a shortage of bike

parking in the town the Office considers that this policy objective should be expanded to include dedicated bike parking at key public transport interchanges, such as this bus station, and additional on street bike parking in the town.

A significant number of local road projects and enhancements are proposed in section 5.5 of the LTP and Chapter 8 of the draft LAP. It would appear that these road projects have been carried over from the County Development Plan. A key function of the LTP process, as set out in section 8.3 of the RSES, is to set out transport investment priorities. To this end, the LTP and draft LAP should be reviewed to ensure that road projects are prioritised based on the consideration of relevant mobility and climate policy.

The Office welcomes the inclusion of policy to support the LTP, including Policy Objective MOV 3. The draft LAP should however provide more explicit support for the 18 Priority Actions identified in section 6.3 of the LTP, including illustrating these measures on maps and providing clear number referencing.

The Office also suggests some minor amendments to improve the clarity and integration of the LTP and LAP, including:

- the active travel options in Tables 5.1, 5.2, 5.3 & 5.7 of the LTP should be cross referenced with Figures 5.1 and 5.2;
- the discrepancies between the density and population projections which are shown on Figure 4.1 of the LTP and those contained within the draft LAP should be resolved (For example, figure 4.1 illustrates that the Blackrock area will have significant population growth more than the key development areas and on land zoned for open space (H1)).

Recommendation 4 – Transport & Accessibility

Having regard to the need to the integration of land use and sustainable transportation, and in particular to:

- sections 4.5 and 8.3 and RPOs 8.1, 8.2, 8.4 and 8.6 of the RSES;
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National

Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021); and

- Policy Objectives MOV 1, MOV 2, MOV 3, MOV 5 and MOV 8 of the Louth County Development Plan 2021 – 2027,

the Planning Authority is required to:

- (i) include a specific objective for modal share targets for Dundalk in Chapter 8 of the draft LAP;
- (ii) review active travel proposals to ensure measures have a clear focus on the specific connectivity and active travel requirements of key development areas and the key locations for economic investment and employment generating uses;
- (iii) provide clearer mapping of the interventions required together with implementation timeframes, to support the delivery of the transport strategy;
- (iv) review Chapter 8 of the draft LAP to provide clearer policies and objectives regarding the delivery and phasing of the 18 Priority Actions to ensure that a cohesive land use and transportation strategy is clearly set out in the draft LAP;
- (v) review and prioritise amend road projects and enhancements in accordance with the National Sustainable Mobility Policy 2022 and the National Investment Framework for Transport in Ireland (2021) with emerging project priorities and implementation timeframes indicated and integrate into the draft LAP;
- (vi) consider additional active travel connections to Dundalk Clarke train station from the west; and
- (vii) expand Policy Objective MOV 11 to provide bike parking at key public transport interchanges, such as the bus station, and additional on street bike parking in the town.

5. Economic development and employment

Dundalk is one of the principal locations for employment in Louth and accounts for c. 40% of the total jobs in the county. The regional policy of the RSES focuses on enhancing Dundalk's role as a '*strategic employment centre on the Dublin – Belfast Economic Corridor*'.

In the National Planning Framework (NPF), the jobs:resident workers for Dundalk is 0.99. It is the aim of the draft LAP to retain this ratio. To achieve this, an additional 3,506 jobs would have to be created up to 2030. In order to facilitate the delivery of these jobs, the draft LAP acknowledges that there are significant tracts of undeveloped lands zoned for employment and business and technology uses to the north, south and west of the town centre. Section 2.4 sets out the Development Strategy for Dundalk and identifies c. 422 ha of undeveloped land for economic investment and employment generating development.

As per RPO 4.21 of the RSES, the draft LAP identifies (Figure 6.3) the key locations for economic investment and employment generating uses and this formation is well-presented with an aerial map for each site, the context, the future uses and infrastructure status. A table setting out the developed and undeveloped lands, should accompany Figure 6.3 for improved clarity.

The Office considers the ambition of the RSES for Dundalk to be a driver of economic growth in the region is well translated from the County Development Plan into the draft LAP in terms of the quantum of zoned economic/employment lands. However, the Office considers that the LAP would benefit from greater integration of transport and land use planning by identifying the types of employment uses for the different locations based on their accessibility, as per section 1.4 of Appendix A of the Development Plans Guidelines:

accessibility is a central consideration in selecting employment zones and the transport provision of potential locations for development needs to be strategically considered: -

- *Low intensity employment uses such as distribution, warehouse, storage and logistics facilities will require good access to the major road network;*
- *High intensity employment uses such as offices will require the highest level of accessibility by public transport, walking and cycling. The sequential approach to land-use zoning will also apply, with lands contiguous to existing*

development within a settlement being prioritised for high-intensity employment zoning ahead of lands located further on the periphery of the settlement.

The transport measures and strategies of the LTP should be integrated into this assessment to ensure sustainable travel patterns and avoid the creation of car dependant employment zones.

In addition, the Office notes that the largest land bank is contained within the Mullagharlin lands, which alone accounts for c. 64% of the total undeveloped employment generating lands (i.e. 269 ha). Given the potential timelines involved in developing a site of this nature and scale, the LAP would benefit from further consideration of the anticipated land activation measures that will be required to facilitate the development of these lands and associated infrastructure in order to meet the employment targets set out in the draft LAP.

Further to the above, the Office has concerns regarding the assessment of the employment lands set out in Table 2 of Appendix 1 (Settlement Capacity Audit). For example:

- Site nos. E1 and T1 are placed joint second but are located on the northern outskirts of the town, immediately south of the M1, with access dependant on the provision of a new road.
- Site no. E3 (Dundalk North Business Park) is placed joint third but is located in Flood Zone A and B.

The audit of employment lands should be reviewed and revised having regard to the points above and as per section 1.4 of Appendix A of the Development Plans Guidelines.

RPO 6.30 of the RSES seeks to support the development of Smart City programmes in Athlone, Drogheda and Dundalk and cites the example of Smart Dublin and the All Ireland Smart Cities Forum. The County Development Plan includes a policy objective EE 32 to support the development of smart city programmes in the Regional Growth Centre of Dundalk.

Policy Objective INF 42 of the draft LAP seeks '*to support and promote the development of Smart City Programmes within Dundalk*'. The Office welcomes this policy objective but considers it should demonstrate more ambition and appropriate linkages to the economic development, development of skills and entrepreneurship, sites for high tech and

potential start-ups, collaborating with DkIT and the Local Economic and Community Plan. Regard should also be had to the National Smart Specialisation Strategy for Innovation 2022-2027 and the ambition for the Eastern and Midlands region (i.e. CREDIT Technology Gateway - a Renewables, Energy Optimisation and Energy Storage research group is based in Dundalk IT).

5.1 Mullagharlin Masterplan (Appendix 4)

A Masterplan for the Mullagharlin lands are contained in Appendix 4 of the draft LAP. The Masterplan area consists of 433.8ha of land between the M1 Motorway and the eastern edge of the Dublin Road (R132). The lands are c. 2km south-west of Dundalk town centre.

The inclusion of the Masterplan in the draft LAP is welcomed by the Office, following our submission on the County Development Plan.

Having regard to section 4.2 of the Compact Settlements Guidelines and given the quantum of undeveloped land in the Masterplan area (c. 312ha), the Office considers that the Masterplan should include greater detail to inform members of the public and prospective applicants in terms of urban structure and form, heights, densities, access and connectivity, active travel routes, open space, Sustainable urban Drainage Systems (SuDS), phasing and sequencing. Particular consideration should be given to how the northwestern part of the lands will be accessed having regard to the location of the railway line. The LTP should also be more fully integrated into this Masterplan with public transport and active travel routes identified.

The Planning Authority should also clarify the site boundary of the Masterplan area and quantum (ha) lands to ensure that the details set out in Appendix 4 aligns with section 6.6.1 of the draft LAP.

Recommendation 5 - Economic development and employment

Having regard to the overall economic strategy for Dundalk as a Regional Growth Centre, and in particular to:

- RPO 6.30 of the RSES, National Smart Specialisation Strategy for Innovation (2022-2027) and Policy Objective EE 32 of the Louth County Development Plan 2021-2027 (County Development Plan) regarding smart cities;
- RPO 4.21 and RPO 6.3 of the RSES for the key locations for economic investment and employment;
- section 6.2.5 and section 1.4 of Appendix A of the Development Plans, Guidelines for Planning Authorities (2022); and
- Policy Objectives SS 19, SS 20, EE 28, EE 29, EE 39, EE42, EE44 of the County Development Plan,

the Planning Authority is required to:

- (i) identify the types of employment uses for the economic investment and employment generating sites identified in Figure 6.3 locations based on their accessibility. The transport measures and strategies of the LTP should be integrated into this assessment;
- (ii) identify the key land activation measures required to facilitate the development of the four largest employment locations identified in Figure 6.3, to support their delivery within the life of the draft LAP, supported by timely infrastructure delivery, and include this information in chapter 6 of the draft LAP;
- (iii) review and revise the audit of the employment lands in the Settlement Capacity Audit in line with items (i) and (ii) above; and
- (iv) provide projects to support the development of Smart City programmes within Dundalk.

Observation 2 – Economic development and employment

Having regard to the overall economic strategy for Dundalk as a Regional Growth Centre and in particular to:

- RPO 4.21 and 6.3 and the regeneration aims for Dundalk of the RSES;
- section 6.2.5 and section 1.4 of Appendix A of the Development Plans, Guidelines for Planning Authorities (2022);
- section 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024);
- Policy Objectives SS 19, SS 20, EE 28, EE 29, EE 39, EE42, EE44 of the Louth County Development Plan 2021-2027,

the Planning Authority is advised to:

- (i) include a table setting out the developed and undeveloped lands for the economic investment and employment generating uses in section 6.6.1 to accompany Figure 6.3;
- (ii) for the Mullagharlin Masterplan (Appendix 4): -
 - a) provide greater detail for the Mullagharlin Masterplan (Appendix 4) on the urban structure and form, heights, densities, access and connectivity, active travel routes, open space, Sustainable urban Drainage Systems, phasing and sequencing;
 - b) engage with Irish Rail and clarify the accessibility to lands to the north of the railway line; and
 - c) clarify the site boundary of the masterplan area and quantum (ha) lands set out in Appendix 4 align with section 6.6.1 of the draft LAP.

5.2 Retail

Dundalk is identified as Level 2 Major Town Centre and County (Principal) Town Centre in the RSES Retail Hierarchy. The RSES requires a retail strategy to be prepared for Dundalk in order to co-ordinate land use and transportation and to provide for sustainable retail development in Dundalk and its hinterland. A qualitative assessment of the future retail

floorspace for Dundalk has been undertaken and this exercise has updated the quantitative retail analysis in the Louth Retail Strategy and is contained in Appendix 3 of the draft LAP.

The Office welcomes the inclusion of policy objectives to support the vitality and viability of the core shopping area, in accordance with the Retail Planning Guidelines for Planning Authorities (2012).

The Office also notes that the County Development Plan includes Policy Objective EE 70 to support the Town Centre First Approach and Policy Objective EE 71 to support the establishment of a Louth County Council-led Town Centre Management Team for Dundalk, although these are not addressed in the draft LAP objectives.

In addition, it is important that the draft LAP identifies the critical measures and / or actions the Planning Authority will implement to tackle the regeneration of the underutilised areas of Dundalk town centre, having regard to public funding available, among others the Town Centre First funds (e.g. Croí Cónaithe). This should apply not only to underutilised lands but also vacant shops and/or vacant buildings. In order to demonstrate the effectiveness of the Planning Authority's approach, the draft LAP should include measurable targets for the resolution of vacancy and proposals for the monitoring of same. This will be addressed in the Implementation and Monitoring section below.

The retail chapter of the draft LAP identifies two Opportunity Sites which it seeks to redevelop, namely the Former Dunnes Stores, Park Street, and Willimason's Mall. The RSES highlights the need to support development on these two sites and as such this section of the draft LAP would benefit from including more design principles, for example through permeability, dual frontages etc.

Observation 3 – Retail

Having regard to the Retail Strategy for Dundalk and in particular to:

- Regeneration principles for Dundalk set down in the Regional Spatial and Economic Strategy, and
- Policy Objectives EE 70 and EE 71 of the Louth County Development Plan 2021-2027,

the Planning Authority is requested to:

- (i) include additional design principles for the development of the two Opportunity Sites; and
- (ii) address Policy Objectives EE 70 and 71 to support the Town Centre First Approach and the establishment of a Louth County Council led Town Centre Management Team for Dundalk.

6. Education, social and community amenities

The Office welcomes the draft LAP includes a Social Infrastructure Audit in Appendix 5, and maps the key services; reference to the audit could be provided in section 5.17 of the draft LAP.

Access to quality childcare, education and health services is a National Strategic Outcome (NSO) of the NPF. In this regard the new development areas of Dundalk (i.e. Mount Avenue, Raynoldstown etc.) should be appropriately planned to include sufficient social infrastructure and supports. It is clear from a review of the Social Infrastructure Audit that there are limited childcare facilities in the immediate areas of these new development zones. As such, a new policy objective should be included in the draft LAP to provide for additional childcare facilities servicing these key development areas, and linked to the occupation of the housing units to ensure its delivery.

It is noted that the Raynoldstown Village Key Development Area includes a requirement for the community centre to be available for use prior to *'no more than 800 units being occupied'*. A similar approach should be considered for Mount Avenue given the size and scale of this key development area.

DkIT is a leading higher education institute in the north Leinster and south Ulster region. RPO 4.22 of the RSES supports the role of DkIT as a centre of excellence for education. The draft LAP notes the DkIT is pursuing a trajectory to achieve technological university status as per Policy Objective SC 33 of County Development Plan. The Office recommends that a policy objective is included in the draft LAP to support this endeavour.

NPO 31 of the NPF seeks prioritisation of targeted and planned population and employment growth with investment in higher education facilities, where this will contribute to wider regional development and programmes for lifelong learning, especially in areas of higher education and further education and training where skills gaps are identified. RPO

4.24 of the RSES requires measures to improve educational attainment, up-skilling in key competencies and skills acquisition. Dundalk is identified as a Regional Growth Centre and education, learning and skills development are all important areas for the Planning Authority to focus on in conjunction with other agencies, such as the Louth and Meath Education and Training Board and DkIT. The draft LAP should therefore give consideration to how these policy objectives can be achieved.

Recommendation 6 - Education, social and community amenities

Having regard to: -

- National Strategic Outcome 10 – Access to Quality Childcare, Education and Health Services and NPO 31 of the NPOF;
- RPO 4.22 and RPO 4.24 of the RSES; and
- Policy Objective SC 33 of the Louth County Development Plan 2021-2027,

the Planning Authority is required to:

- (i) review the need for additional childcare facilities as part of the build-out of the key development areas and include a policy objective linking their delivery to the occupation of the housing units;
- (ii) include a new policy objective to support DkIT achieving technological university status, and
- (iii) provide measures to improve educational attainment, up skilling in key competencies and skills acquisition in collaboration with relevant agencies such as the Louth and Meath Education and Training Board and DkIT.

7. Infrastructure (SuDS, Green & Blue)

The draft LAP supports the use of SuDS and nature based solutions with appropriate policy provided under Policy Objectives INF 7, 11, 12 and 13. Policy objective INF 17 refers to the Dundalk and Blackrock Flood Relief Scheme (FRS) and is welcomed. Having regard to the proximity of the draft LAP to the coast, Policy Objectives INF 22-26 of the draft LAP, protecting against coastal erosion, are also noted and welcomed.

The Office is however concerned that there is not sufficient consideration of green (and blue infrastructure) in the draft LAP, consistent RPO 7.22 and RPO 7.23 of the RSES, and with Policy Objective NBG 45 of the County Development Plan:

To prepare specific Green Infrastructure Strategies for the Regional Growth Centres of Drogheda and Dundalk and integrate into the local area plan for each settlement.

Integrating these strategies into the plan-making process produces better outcomes by informing the other plan elements, such as the design of open spaces, parks, public realm etc. This in turn contributes to the creation of healthy, low carbon, resilient and connected settlements and places (see section 4.4 of the Compact Settlements Guidelines. This point is especially prevalent for the large development sites, such as Mount Avenue, Raynoldstown Village and Mullagharlin etc. The Office of Public Works (OPW) has raised the same point in its submission and this matter is addressed below in the flooding section.

Recommendation 7 - Green and Blue Infrastructure

Having regard to the provision of sustainable infrastructure and nature based water management solutions, and in particular to:

- Policy Objective NBG 45 of the Louth County Development Plan 2021-2027;
- RPO 7.22 and 7.23 of the RSES; and
- section 4.4 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024),

the Planning Authority is required to:

- (i) prepare a Green Infrastructure Strategy for Dundalk and integrate this into the draft LAP, and
- (ii) review and amend the sustainable infrastructure policy framework, to include both green and blue infrastructure.

8. Flood risk management

The Office welcomes Policy Objective INF 17 and 18 of the draft LAP to progress the Dundalk and Blackrock FRS, an objective of the CDP (Policy Objective IU 29).

The Office also welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) and accompanying Plan Making Justification Tests (Justification Test) (section 4.5) to inform the policies and objectives of the draft LAP and the indication of Flood Risk Zones A and B on the land use zoning maps for the draft LAP.

However, the Office notes the submission from the OPW and its concerns that some of the undeveloped areas have not satisfied all criteria of the Justification Test, but have retained their zoning on the grounds that Policy Objective INF 21 of the draft LAP would limit future development / grants of permission.

It is acknowledged that the land use zonings for Dundalk were prepared as part of the County Development Plan, and the draft LAP must be in compliance with this Development Plan. The Planning Authority is however advised to actively engage with the OPW on these matters when preparing its new County Development Plan, work on which is due to commence in 2025. In particular, greater consideration of the precautionary approach for climate change impacts and future scenario mapping at the plan making stage will be required.

The Planning Authority should also ensure that the flood risk management provisions identified below are addressed.

Recommendation 8 – Flood Risk Management

Having regard to flood risk management, and in particular to: -

- RPO 7.12 of the RSES;
- Policy Objective IU 29 of the Louth County Development Plan 2021-2027; and
- the Planning System and Flood Risk Management Guidelines (2009),

the Planning Authority is requested to:

- (i) review the SFRA and the Neagh Bann River Basin Flood Risk Management Plan on additional measures to include in the draft LAP regarding maintenance of the arterial drainage schemes and maintenance of drainage districts, including ensuring that access requirements are preserved for maintenance, and that

applications for development on land identified as benefiting land may be prone to flooding and require site-specific flood risk assessments;

- (ii) include a register of key flood risk infrastructure in the draft LAP;
- (iii) provide greater consideration of climate change impacts and overlay these maps on the land use zoning maps;
- (iv) review the Plan Making Justification Test for zoned land in areas at risk of flooding having regard to (i)-(ii) above and with particular regard to the mitigation measures required; and
- (v) demonstrate how Sustainable urban Drainage Systems should be integrated into the key development sites, character areas and masterplan areas.

The Planning Authority is advised to engage with the Office of Public Works.

9. Climate action mitigation and adaption

The Office welcomes the inclusion of Chapter 4 on climate change in the draft LAP and the additional supporting chapters on flooding (Chapter 9) and Green Infrastructure (Chapter 10).

The Office supports the inclusion of Policy Objective CA 1 of the draft LAP in achieving the Government Targets as set out in the Climate Action Plan 2024 and NPO 54 of the NPF (seeks to reduce carbon footprint by integrating climate action into the planning system).

As part of the Louth Climate Action Plan 2024-2029 (Louth CAP), Dundalk / Blackrock Decarbonising Zone (DZ) has been established. The extent of the DZ includes the towns of Dundalk and Blackrock and matches the settlement boundary of Dundalk as set out in the draft LAP. For the DZ a baseline emissions inventory was undertaken and industry had the largest share of emissions (44%) and transport with the second largest (24%). The Louth CAP includes 16 specific actions to target a reduction in these baselines emissions within the DZ. The draft LAP includes Policy Objective CA 4 to support the implementation of the DZ and 16 actions contained in the Louth CAP.

There is however, an opportunity for the draft LAP to include more specific policy measures and actions to give effect to and complement the objectives and actions from the respective Louth CAP which are specific to the Decarbonisation Zone and have a strong relationship

to planning such as transport and the built environment (for example the smarter mobility strategy).

Observation 4 – Climate action mitigation and adaption

Having regard to: -

- NPO 54 of the National Planning Framework;
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%; and
- the Louth Climate Action Plan 2024-2029,

the Planning Authority is requested to review and revise the draft LAP to include additional and more specific climate action policy objectives which support and relate to the Dundalk / Blackrock Decarbonisation Zone.

10. Environment and natural and built heritage

The draft LAP sets out a strategy for culture and built and natural heritage of the town in Chapter 10. The draft LAP designates views and prospects of special amenity value and Policy Objective CH 12 protects these views and prospects from inappropriate development. It separately highlights the importance of the Coast Road in Blackrock Village as a designated scenic route. The draft LAP also designates zones of archaeological potential, trees and woodlands of special amenity value and wetland sites, all of which is in compliance with NPO 60 of the NPF (natural and cultural heritage).

The draft LAP identifies a number of Architectural Conservation Areas (ACA) in accordance with NPO 17 of the NPF (built heritage). The County Development Plan intends to carry out further ACA Character Appraisals during its lifetime, including Clanbrassil Street in Dundalk. The draft LAP should include reference to this.

The Office also recommends that the draft LAP make reference to the extra provision within the County Development Plan for additional tree replacements if required to facilitate development, as per Policy Objective NBG 31 of the County Development Plan.

Observation 5 – Environment and natural and built heritage

Having regard to Policy Objective NBG 31 and section 9.6.1 of the Louth County Development Plan 2021-2027, the Planning Authority is advised to make reference to the forthcoming ACA Character Appraisal for Clanbrassil Street and the additional tree replacement ratios required for Dundalk.

11. Implementation and Monitoring

Section 6.5 of the LAP Guidelines states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effective monitoring systems such as reviewing the progress in securing the objectives of the development plan in accordance with section 15 of the Act.

The draft LAP addresses implementation and monitoring in Chapter 11. It does not set out any actions for implementing the objectives of the draft LAP and states that the monitoring procedures are *'being developed in line with the Louth County Development Plan'*. The draft LAP states that the Planning Department will be the lead section for implementing and monitoring the LAP, primarily through the application of the Development Management process.

It is considered, however, that a more systematic approach to monitoring would better assist the Planning Authority in implementing the key objectives/actions of the draft LAP, and by identifying lead responsibility and a timeline for implementation of actions.

Observation 6 – Monitoring and Implementation

Having regard to section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, the Planning Authority is requested to review the proposed provisions of the draft LAP concerning implementation and monitoring to provide a more detailed systematic approach to monitoring the implementation of key objectives and/or actions of the draft LAP.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above.

As you are aware, the report of the chief executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed. Where your authority decides not to comply with the recommendations of the Office, made in the draft LAP and report, please outline the reasons for the decision in the chief executive's report.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
