

DOWNEY

29 Merrion Square, D02RW64

PLANNING STATEMENT & STATEMENT OF CONSISTENCY

**Proposed Large-scale Residential Development
Amendment**

**Cois Farraige, Old Golf Links Road,
Blackrock, Dundalk,
Co. Louth**

Applicant: Westdalk (ROI) Ltd.

July 2025

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INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this Planning Statement and Statement of Consistency with Planning Policy on behalf of our client and the applicant, Westdalk (ROI) Ltd., to accompany a proposed Large-scale Residential Development (LRD) application on lands located at Cois Ferraige, Old Golf Links Road, Blackrock, Dundalk, Co. Louth. The LRD application is for modifications to a previously permitted Strategic Housing Development (ABP Ref. 303253-18) located on lands at Old Golf Links Road & Tuites Lane, Blackrock, Dundalk, Co Louth. The naming of the development has been approved as 'Cois Ferraige' by Louth County Council under Condition 11 of ABP Ref. 303253-18. The amendments, subject to this proposal, relates to open space and 4 no. units in total, located at the front of the site on Old Golf Links Road.

The proposed development, as per the description contained within the statutory planning notices, provides for:

"We, Westdalk (ROI) Ltd., intend to apply for permission for development at Cois Ferraige, Old Golf Links Road, Blackrock, Dundalk, Co. Louth. The development will consist of proposed modifications to the previously permitted Strategic Housing Development (SHD) (158 no. units permitted under Refs. ABP-303253-18 and extended under Reg. Ref. 23406, and under construction) which includes the proposed relocation to the east of a previously permitted western open space area and the proposed relocation to the west of 4 no. previously permitted 3-bed two storey semi-detached houses (Nos. 69-72), with revised 3-bed two storey semi-detached house types in this new location with associated car parking, landscaping and boundary treatment modifications to accommodate this relocation, and all associated site works necessary to facilitate the development. The application may also be inspected online at the following website set up by the applicant: www.coisferraigeblackrock.com/lrd"

This development project has been shaped by insights gained from a Stage 1 Pre-Planning meeting held under Section 247 of the Planning and Development Act, 2000 (as amended), between Louth County Council and members of the design team.

At this juncture, it must also be noted that the Planning Authority issued a determination under Section 247 (7) and states that *"it is considered that the proposed development is substantially the same as the "permitted development". It is therefore concluded that no consultation is required under Section 247(7)(a) and (b) of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 prior to a modification application being lodged."*

Pre-planning consultation therefore concluded at this stage of the process and this application is now being submitted for the consideration of the Council as a result.

This LRD application emerged after a Strategic Housing Development (SHD) application (ABP Ref. 303253-18) was granted for development on site. Permission was initially sought for 166 no. housing units, with Condition 2 of An Bord Pleanála granting permission for 158 no. houses. This development is in the process of being implemented, with construction completed on a large number of houses (now occupied) and a large number of houses substantially complete. During the course of the

construction, archaeological remains were found within an area intended to accommodate 4 no. houses. As such, these houses were not built, and a Public Open Space area is being developed instead. The applicant is now seeking to re-instate these 4 no. houses in an alternative location, as per the subject LRD application. These 4 no. houses will still provide a total of 158 no. housing units within Cois Ferraige, as has been permitted within the parent permission application (ABP Ref. 303253-18).

This Planning Statement outlines the context of the subject site and the background and rationale of the proposed development along with a statement of compliance with all relevant national, regional, and local planning policies. This document will be separated into two different sections: Part A will include a Planning Statement for the proposed development, with Part B outlining the Statement of Consistency with Planning Policy.

It is noted this report should be read in conjunction with the accompanying detailed documentation prepared by the design team, all of which are submitted under separate covers.

PART A – PLANNING REPORT

1.0 SITE LOCATION & DESCRIPTION

The subject lands are located along the Old Golf Links Road, on a site area of 0.1043ha. The application site area is located within the wider Cois Farrage residential development. The site is located within the suburb of Blackrock, approximately 4km south from Dundalk.

Golf Links Road is a low-density residential area characterised by single-family detached homes on large plots, such as those established on Tuites Lane and Old Golf Links Road to the north-west and west of the site, and those established at the Hamilton Drive and Rock Road to the north-east and east of the site. To the south and south-east, the range of housing typologies broadens with semi-detached and terraced housing, recently developed at Gort na Glaise and Cois Farrage residential developments, the latter of which is being developed by the applicant and is subject to this amendment application.

Access to the site is currently achieved via Old Golf Links Road, from Dublin Road (R132) heading towards Dundalk. The proposed development will be located within the growing Blackrock suburb and is within walking/cycling distance of a wide range of services and facilities for future residents. There is a good pedestrian network throughout the area with extensive footpaths and walkways which the proposed development will connect directly to via the entrance share with the adjoining Cois Farrage scheme.

Cois Farrage is currently under construction and nearing completion. The total houses within the estate will provide for 158 no. units, with various typologies of residential units to cater for the future population of the area.

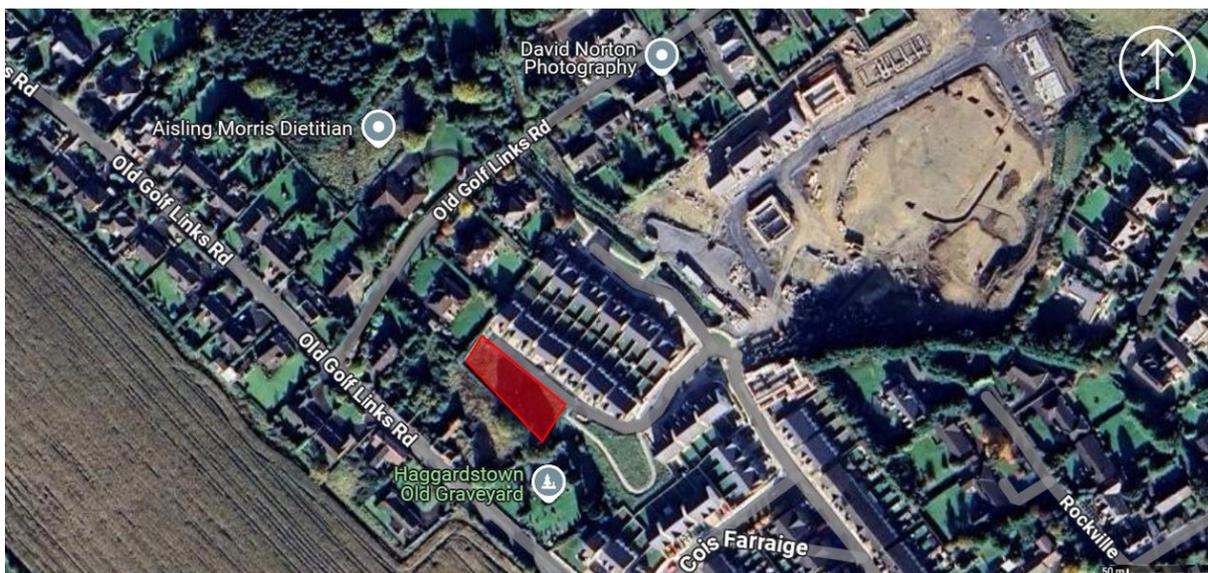


Figure 1. Aerial View of the Subject Site (approximate boundaries of the site outlined in red)



Figure 2. Access to Cois Farrage from Old Golf Links Road



Figure 3. Existing Site to the left, with existing houses to the right



Figure 4. Aerial View of the Subject Site in wider context

2.0 PLANNING HISTORY

DOWNEY have researched into the planning history of the subject site and noted 1 no. application pertaining to the subject site and the wider landholding in the ownership of the applicant, relating to the SHD application under Ref. **ABP-303253-18**, whereby as per the statutory planning notices provides for:

“Housing Development Application to An Bord Pleanála: Westdalk (ROI) Ltd. intend to apply to An Bord Pleanála for permission for a strategic housing development at a site at Old Golf Links Road and Tuite’s Lane, Blackrock, Dundalk, Co. Louth. The development will consist of 166 no. residential units comprising of 67 no. 1-3 bed apartments/duplexes within 12 no. 2-3 storey blocks, and 99 no. 2-storey, 2-4 bed, semi-detached/detached/terraced houses. Provision of a creche (c. 250sq.m), bike and bin stores, 294 no. car parking spaces. Provision of open space and completion of street network and link roads. Main access to Old Golf Links Road via existing estate road shared with the adjoining Cois Farraige estate. Separate access via Tuite’s Lane and extension of public footpath along Old Golf Links Road (on the land in ownership of application). All associated site development works, landscaping, boundary treatments and services provision. A Natura Impact Statement has been prepared as part of the application.”

This application is considered the parent permission for the subject development with construction on-going for the above development. Under Condition 2 of the Board Order, permission was granted

for a total of 158 no. housing units on site, through the removal of Block G3.

Under **Reg. Ref. 23406**, by Order dated 26th October 2023, permission was granted for the Extension of Duration of this application. Recently, the applicant has applied for a further Extension of Duration of this application under **Reg. Ref. 2589**, to allow for construction to be completed by December 2026. A decision on this application is due on 17th August 2025.



Figure 5. ABP-303253-18 Houses complete at the front of the estate



Figure 6. ABP-303253-18 Under Construction



Figure 7. ABP-303253-18 Under Construction to the left, with houses completed to the right

3.0 PRE-APPLICATION CONSULTATION

Stage 1 – Section 247 Pre-Application Consultation with Louth County Council

The first Pre-Application Consultation with the Planning Authority required under the Section 247 of the Planning and Development Act, 2000 (as amended), took place on the 22nd of August 2022 @14.00 via Microsoft Teams.

Attendees included:

Rueben Kirrane - Denis Williams Design Services

Yegor Korolovych - Denis Williams Design Services

Patricia Hughes, Senior Executive Planner, LCC

The purpose of the meeting was to discuss a proposal for the provision of 4 dwellings proposal on an area that was designated public open space in the permitted SHD development (ABP 3030253-18).

At this juncture, it must also be noted that the Planning Authority issued a determination under Section 247 (7) and states that *“it is considered that the proposed development is substantially the same as the “permitted development”. It is therefore concluded that no consultation is required under Section 247(7)(a) and (b) of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 prior to a modification application being lodged.”*

Pre-planning consultation therefore concluded at this stage of the process and this application is now being submitted for the consideration of the Council as a result.

Part V Engagement

Part V of the Planning and Development Act, 2000 (as amended) applies to the proposed development. In order to reach an agreement regarding compliance with Section 96 of Part V of the Planning and Development Act, 2000 (as amended), the applicant has been in on-going discussions with Louth County Council to provide appropriate Part V provisions within the wider Cois Ferraige housing estate permitted under Ref. ABP-303253-18. The agreed housing units within this application are located elsewhere within this estate, and under ABP-303253-18, it was never intended for the subject units to be allocated for Part V. As such, the applicant (developer) remains compliant with Part V provisions intended under the parent permission, Ref. ABP-303253-18.

4.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The proposed development, as per the description contained within the statutory planning notices, provides for:

“We, Westdalk (ROI) Ltd., intend to apply for permission for development at Cois Ferraige, Old Golf Links Road, Blackrock, Dundalk, Co. Louth. The development will consist of proposed modifications to the previously permitted Strategic Housing Development (SHD) (158 no. units permitted under Refs. ABP-303253-18 and extended under Reg. Ref. 23406, and under construction) which includes the proposed relocation to the east of a previously permitted western open space area and the proposed relocation to the west of 4 no. previously permitted

3-bed two storey semi-detached houses (Nos. 69-72), with revised 3-bed two storey semi-detached house types in this new location with associated car parking, landscaping and boundary treatment modifications to accommodate this relocation, and all associated site works necessary to facilitate the development. The application may also be inspected online at the following website set up by the applicant: www.coisfarraiigeblackrock.com/lrd”

4.1 Key Characteristics of the Proposal

The key characteristics of the proposed development are set out below for the convenience of the Council:

Table 1. Key Characteristics of the Proposed Development

Gross Site Area	0.1043
No. of Residential Units	4
Car Parking Spaces	4 One space per dwelling
Bicycle Parking Spaces	Bicycle parking spaces/storage will be provided in the curtilage of each dwelling.
Private Open Space	Ranging from 46 sq. m. to 107 sq. m.

For further details in this regard, the Planning Authority are invited to refer to the architectural drawings and reports prepared by Denis Williams Design Services Architects and Engineers, enclosed with this application.

4.2 Proposed House Type

The proposed housing types include 4 no. 3-bedroom two storey semi-detached units, with 3 no. house types proposed, House Type C4, House Type F, and House Type K. Unit Nos. 70 and 71 will be House Type F, unit No. 69 is proposed to be House Type C4, with unit No. 72 as House Type K.

Within the parent permission of Cois Farraiige, ABP Ref. 303253-18, permission was granted for House Type C and House Type F, and this has now been implemented into the construction of the wider development. As such, while House Type K is a new house type within the development, it is considered to be of a similar style and layout of the approved houses. House Type K includes an extra bathroom located via the utility room off the main entrance of the dwelling.

All housing units provides for sufficient spaces within the various rooms, with a ground floor kitchen/dining area and living room, with the first floor providing 3 no. bedrooms (including 1 no. en-suite), bathroom, and store area.

House Type K and C have also been designed to provide an active gable on the side of the houses, to ensure no blank gables are provided. In House Type K, the main front entrance is provided from the side (on the west side), whereas House Type C provides various windows across this side (on the east side).

Louth County Council are invited to refer to the architectural drawings submitted under separate cover of the application, prepared by Denis Williams Design Services Architects and Engineers.

4.3 Public Open Space

0.135ha of open space (pocket park) is being provided adjacent to the proposed 4 houses, northeast of the graveyard located at the entry of the parent development; the pocket park includes a wildflower garden and edging around the outer parameter. This pocket park open space area is an additional area to the planned open space area located where the stream divides the east and west of the parent development. It is therefore concluded that sufficient public open space is being provided within the overall development and is therefore considered acceptable.



Figure 8. Existing wildflower garden to the front/left, with subject site for development to the rear/right

5.0 PLANNING CONTEXT

The proposed development is consistent with all relevant national, regional, and local planning policies as they pertain to these lands. In this regard, Part B of this report contains a Statement of Consistency with Planning Policy. In order to avoid undue repetition, Louth County Council are invited to refer to Part B of this report to confirm how the proposal is consistent with the relevant national, regional, and local planning policy.

Notwithstanding that, it is important to confirm the fundamental planning policies as they relate to the site, particularly land use zoning. Under the current Louth County Development Plan 2021-2027

and the Dundalk Local Area Plan 2025-2031, the subject site is zoned “A1 Existing Residential” which has the following objective:

“To protect and enhance the amenity and character of existing residential communities.”

Further guidance of this objective set out within the County Development Plan states:

“The objective for this zoning is to conserve and enhance the quality and character of established residential communities and protect their amenities. Infill developments, extensions, and the refurbishment of existing dwellings will be considered where they are appropriate to the character and pattern of development in the area and do not significantly affect the amenities of surrounding properties. The strengthening of community facilities and local services will be facilitated subject to the design, scale and use of the building or development being appropriate for its location.”

Under the A1 Existing Residential zoning, the following uses are permitted in principle:

Uses Permitted in Principle under the A1 Existing Residential Land Use Zoning

Allotments, B&B/ Guest House, Community Facility, E-Charging Facility, Home Based Economic Activities, Nursing Home, Park/Playgrounds, Place of Worship, Recreational /Amenity Open Space, Recreational /Sports Facility, **Residential**, Residential Institution, Retirement Village, Sheltered Accommodation, Traveller Accommodation, Utilities.

Table 2. Permitted Uses under the A1 Existing Residential Land Use Zoning

LEGEND				
Land Use Category				
A1 Existing Residential	B5 Retail, Leisure and Recreation	F1 Research, Education and Innovation	K1 Agriculture	Settlement Boundary
A2 New Residential Phase 1	C1 Mixed Use	G1 Community Facilities	L1 Strategic Reserve	Future Link Roads
A3 New Residential Phase 2	C2 Port Harbour Area	H1 Open Space	SO Spot Objective	Osi Vector Mapping
B1 Town or Village Centre	D1 Regeneration	I1 Tourism and Leisure	OPW CFRAM Study	
B2 Neighbourhood Centre	E1 General Employment	J1 Transportation Development Hub	Flood Zone A	
B4 District Centre	E2 Business and Technology	J2 Public Infrastructure and Utilities	Flood Zone B	

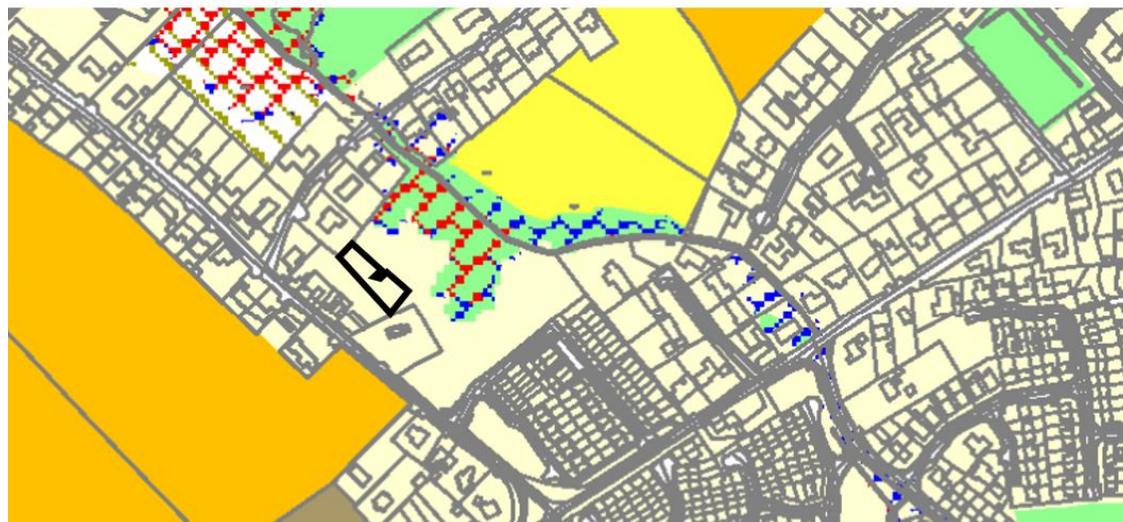


Figure 9. Zoning Objective of the Subject Lands extracted from Louth Development Plan 2021-2027 (approximate boundaries of the subject site in black outline).

As outlined above, the proposed development is for an amendment to the previously permitted 158 no. residential units, granted under SHD ABP Ref. 303253-18. The amendments include the relocation

of 4 no. houses to now be located on the western side of the site, immediately opposite existing houses (with construction completed). As such, the subject proposal can be considered an infill development within the existing area, located on appropriately zoned land, and as such is deemed acceptable.

6.0 CHILDCARE PROVISION ASSESSMENT

6.1 Introduction

As a part of this amendment application, DOWNEY have prepared a Childcare Provision Assessment, on behalf of our client and the applicant, Westdalk (ROI) Ltd, for the proposed development of 4 no. residential units on lands at Old Golf Links Road & Tuites Lane, Blackrock, Dundalk, Co Louth.

The proposed development, subject to this application provides for 4 no. residential units (4 no. 3-bed, 2-storey semi-detached houses) as a part of the identified Cois Farraige Development already granted (ABP Ref. 303253-18) and currently under construction.

At this juncture, it is critical to note the current situation in the wider context of the amendment application, namely, the parent application's provisions for a 250 sq. m. creche is currently under construction as a part of the granted ABP-303253-18 and is expected to be completed in the coming months.

The applicant is currently in discussions with various experienced and successful childcare providers in the County Louth area regarding this development. The results of this childcare assessment, with respect to the Cois Farraige development's construction of a childcare facility, coupled with childcare facilities provided in the wider area, is considered more than sufficient to cater for the potential demand generated within this emerging context. The following policy and guidance documents have been reviewed in the preparation of this assessment:

- Childcare Facilities Guidelines for Planning Authorities, Department of Environment (2001),
- Sustainable Urban Housing: Design Standards for New Apartments (December 2020), and
- Louth County Development Plan 201-2027.

It is noted that the assessment of current and future childcare facilities for the area includes the analysis of CSO data and childcare facilities located within the catchment area of the proposed scheme and the current trends and details provided by the TUSLA and Pobal websites, as well as information provided by the Louth County Childcare Committee (LCCC).

6.2 Policy Context

As stated in the Louth County Development Plan 2021-2027, *"The provision of childcare facilities is acknowledged as a vital component of social infrastructure, fundamental to national economic and social wellbeing as it facilitates participation in the workforce, education and social networks. The Council supports the sustainable development of good quality and accessible childcare facilities in the County"*.

The development plan reinforces the views taken within the guidelines in which the Council provide the following policy objectives:

“Policy Objective SC35: To support and facilitate the sustainable provision of childcare facilities in appropriate and suitable locations and seek their provision concurrent with new residential development, all having regard to the Childcare Facilities Guidelines for Planning Authorities (2001) and Childcare Regulations (2006) and any subsequent guidelines, in consultation with the Louth County Childcare Committee. Such facilities will be directed to settlements identified in the Settlement Hierarchy.”

“Policy Objective SC36: To seek the provision of additional community benefits by way of direct provision or financial contribution in lieu of the provision of childcare facilities where it is demonstrated to the satisfaction of the Council that there are sufficient childcare spaces available in the locality.”

“Policy Objective SC37: To permit childcare facilities of appropriate size and scale in settlements, in proximity to existing community and/or educational facilities and in existing residential areas provided they do not have a significant negative impact on the character or amenities of an area, particularly with regard to traffic generation, car parking and noise disturbance.”

“Policy Objective SC38: The Council will encourage the co-location of childcare facilities with schools in the interest of sustainable development.”

It is submitted that given the nature and scale of the proposed development (4 no. units), as well as the available childcare facilities within the area, and the proposed childcare facility under the granted parent permission SHD application (ABP-303253-18), that there is and will be sufficient capacity to cater for the proposed development.

6.3 Childcare Provision Assessment

In accordance with current guidelines, the following provides an examination of the local need for a new childcare facility at the subject lands in Blackrock. Accordingly, TUSLA Pre-school Inspection Reports for different facilities in the locality were examined in detail. However, it was found that these are often outdated and/or not necessarily an accurate reflection of current provisions in the area.

Thus, in order to provide for more accurate information, a survey of different childcare facilities in the area was carried out by contacting these facilities, seeking numbers of current pre-school goers registered for the academic 2024/2025 school year, as well as the available capacity of each facility.

It is important to note that not all the childcare facilities decided to participate in the assessment. Therefore, where proprietors did not participate or could not be contacted, figures from the most recent TULSA reports are referenced. In accordance with the childcare guidelines, the assessment is set out as follows:

- The existing childcare facilities in the vicinity of the subject lands, and their spatial distribution in the area.
- Catchment area of the existing childcare facilities, and
- The emerging demand for childcare facilities including the future demand in the town and the generated demand from the proposed development.

6.4 Existing Early Childcare Facilities

DOWNEY have assessed the Early Years Inspectorate reports in relation to details pertaining to these facilities and contacted these childcare providers to update the existing and available capacities. The relevant details on these facilities are summarised in Table 3 below.

As illustrated below, the existing childcare facilities within the area provide for a total maximum potential capacity of 121 children.

Table 3: Childcare Facilities within 1-2km Radius of the Subject Lands (Source: TULSA.ie updated by DOWNEY)

Name	Address	Max Capacity	Type of Service Age Profile
Within 1 Km Radius of the Subject Lands			
Happy Dayz Creche	Sandy Lane, Blackrock, Blackrock, Co. Louth	25	3-6 years
Footprints Preschool	Blackrock Community Centre, Sandylane, Dundalk, Co. Louth	22	0-5 years
Liana Lally Preschool	Tuites Lane, Old Golf Links Road, Blackrock, Dundalk, Co. Louth	30	0-5 years
Within 2 km Radius of the Subject Lands			
Little Oaks	St Fursey's National School, Marlbog Road, Haggardstown, Dundalk, Co. Louth	44	2-6 years
Overall Existing Capacity		121 Childcare Spaces	

6.5 Catchment Area of the Existing Childcare Facilities

As a part of the threshold for provision of childcare facilities, a spatial analysis of the catchment area of the existing childcare providers within the Blackrock area was conducted. This is to identify the walkable distances from the childcare facilities, which is defined as 500 to 800m distances from the childcare facilities on the street network. Given the location of the subject site, this catchment area reaches to the boundaries of the site providing a good level of walkability to 3 no. childcare facilities located at Tuites Lane and Sandy Lane.

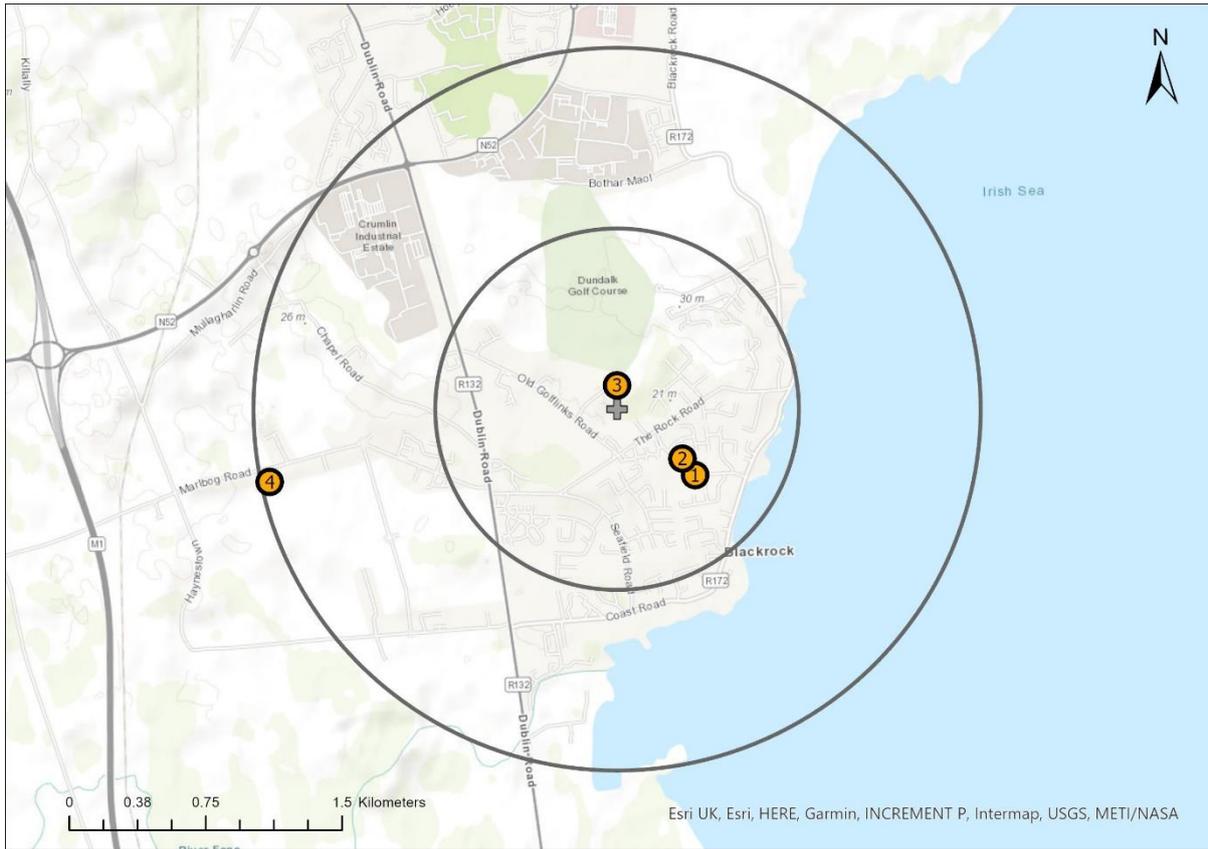


Figure 10: Location of Childcare Facilities within 1-2km of the Subject Lands (approximate location of the lands outlined in red)

With reference to the proposed childcare facility as part of the granted SHD application for Cois Farrage development (ABP Ref. 303253-18), it is submitted that suitable capacity exists for the construction of the proposed 4 no. houses as a part of this amendment application.

6.6 Future Demand

The demographic profile of the subject lands was examined using the Census 2022 result, as the latest Census available on the CSO website. With respect to the site location within Haggardstown Electoral Division, in the immediate vicinity of Blackrock (Figure 1111), this ED was used in the following assessment.

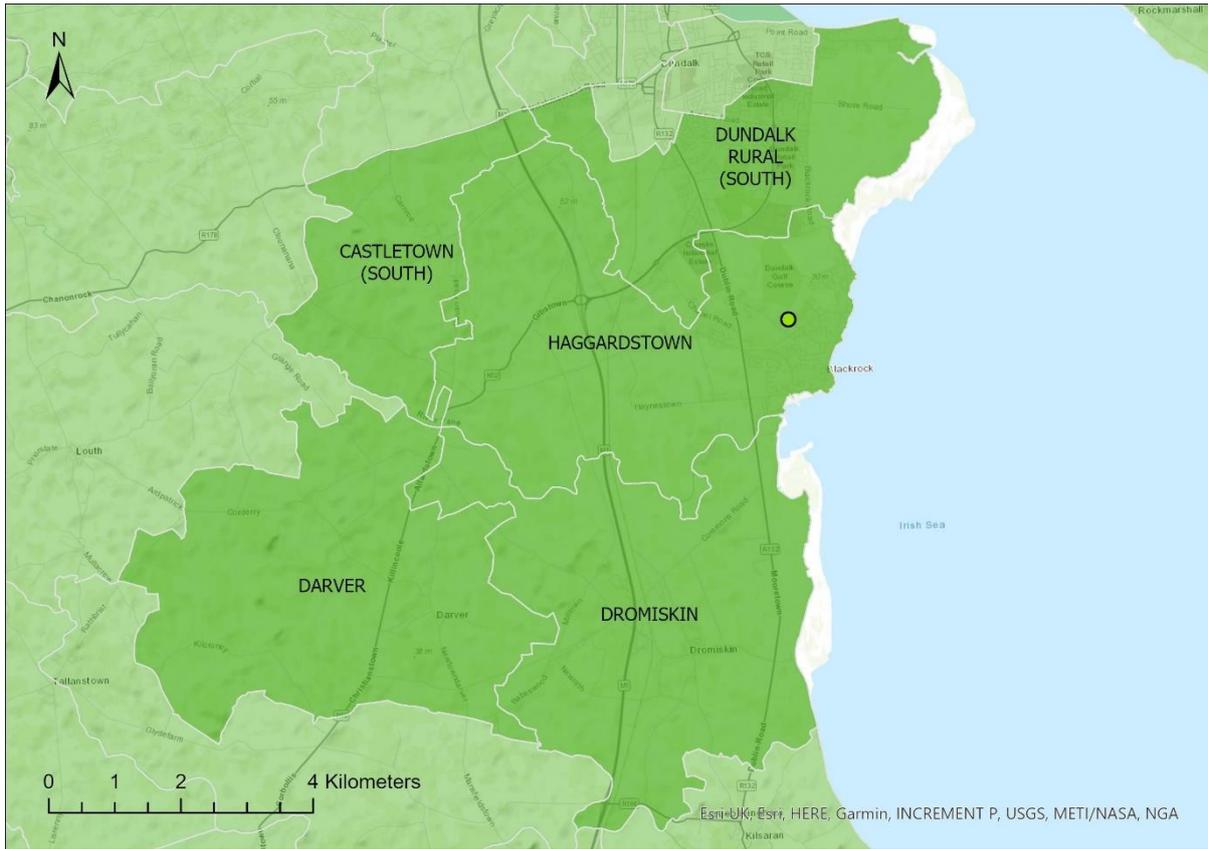


Figure 11: Subject Site Location within the Electoral Division and Assessment Area

Census 2022 results show that the Haggardstown’s area population stood at 9,301 in April 2022, which indicates a significant increase of 2,369 (34.17%) since the last Census in 2016. This is a considerably higher population growth than was recorded within the County Louth Area, which saw only an 8.39% population increase between 2016-2022.

Table 4. Population Change in Haggardstown Area against the overall Stats for the County, 2016-2022

	Co. Louth (Administrative Area)	Haggardstown ED
Census 2022	139,703	9,301
Census 2016	128,884	6,932
Actual Change	10,918	2,369
Percentage Change	8.39%	34.17%

With an average household size of 2.8, there were 3,293 private households in the Haggardstown Area in 2022. As shown in the Table 5 below, nearly 70% of the households residing in this area in 2022 were small sized households ranging from 1- to 3-person households (2,242 households).

Table 5. Private Households in Haggardstown Area by Household Size, 2022

Size of household	Haggardstown ED	%
1-person Households	686	20.83
2-person Households	959	29.12
3-person Households	597	18.14
4-persons Households	604	18.34
5-person and over Households	447	13.57
Total	3,293	-

6.7 Childcare Demand

Investigating the age profile of the area as per Census 2022 and as reflected in Table 6 below, while there was a decrease in the number of pre-school-attending population County, however, there was an increase in this age profile in the Haggardstown ED, recording an increasing trend for this age group in the area.

Table 6. Pre-school-age Going Population in the Assessment Area (0-4-year-old age cohort), 2016-2022

Assessment Area	CSO 2022 0-4 y/o	% Town Population	CSO 2016 0-4 y/o	% Town Population	% Change 2016-2022
Haggardstown ED	646	6.95	546	7.88	+18.31
Co. Louth	8,260	5.91	9,473	7.35	-12.80

Source: CSO StatBank

As illustrated in the Table below, assuming a continuation of the 2016-2022 growth rates across the Haggardstown ED, the pre-school population in the Haggardstown area is expected to be 764 children in 2028, which would be an increase of 118 since 2022.

Table 7. Estimation of Population aged 0-4 years old within the Assessment Area over 2023-2028

	2016	2022	2023	2024	2025	2026	2027	2028
Haggardstown ED	546	646	665	685	705	726	748	764

6.8 Demand Generated by the Proposed Development

As discussed previously, the subject application is an amendment application to a previously permitted SHD, ABP Ref. 303253-18. Within the parent permission, a total of 166 no. houses were proposed, with a total of 158 no. houses granted permission. At the time of assessment of this application in 2018, it was considered that this increase in population was deemed acceptable and that appropriate facilities were in place at such time to cater for the demand generated by the Proposed Development. As such, with construction under way on the parent permission, and a substantial number of homes completed and occupied, the subject amendment LRD application will not assess the demand generated by 158 no. houses, but rather of only the 4-no. houses seeking permission within the subject application.

The subject application is seeking permission for 4 no. 3-bedroom houses. As mentioned earlier, Census 2022 recorded an average household size of 2.8 persons per unit for the population residing within the administrative boundaries of Louth County Council. Applying the average household size to 4 no. houses, this would generate 11.2 total residents within these units. According to Census 2022, 6.95% of Haggardstown ED’s population were in the 0-4 age cohort. When the proportion of pre-school-attending population applied to total number of potential residents in the proposed units, *it is estimated that only up to 1 no. child will be at this age cohort.*

6.9 Childcare Assessment Conclusion

In light of the above, it is submitted that the current provision of early childcare facilities in the area can sufficiently cater for the town’s future population and the influx of population arising from the proposed development, and therefore, the scheme is considered to be consistent with the relevant policies and guidelines. It is also important to note that the proposed 4 no. units will bring the total number of units within Cois Ferraige back up to 158 no. houses which is the same amount as was previously permitted under ABP Ref. 303253-18.

7.0 COMMUNITY AND SOCIAL INFRASTRUCTURE AUDIT

This Section outlines the range of services and facilities that are available within the surrounding area of the subject site, including schools, recreation, and retail provision, and discusses their capacity to accommodate the proposed development.

7.1 Childcare Facilities

As discussed in Section 6.0 above, a total of 4 no. registered childcare providers were found within a 2km radius of the site, as per Figure 12 below. As shown in Table 8 below, the existing childcare facilities within the area provide for a total maximum potential capacity of 121 children. As set out within Section 6.0 above, it is submitted that there is sufficient capacity within the surrounding area to cater for the proposed 4 no. houses proposed as part of this LRD application.

Table 8. Childcare Facilities within 1-2km Radius of the Subject Lands (source: Tulsa.ie updated by DOWNEY)

Name	Address	Max Capacity	Type of Service Age Profile
Within 1 Km Radius of the Subject Lands			
Happy Dayz Creche	Sandy Lane, Blackrock, Blackrock, Co. Louth	25	3-6 years
Footprints Preschool	Blackrock Community Centre, Sandylane, Dundalk, Co. Louth	22	0-5 years
Liana Lally Preschool	Tuites Lane, Old Golf Links Road, Blackrock, Dundalk, Co. Louth	30	0-5 years
Within 2 km Radius of the Subject Lands			
Little Oaks	St Fursey’s National School, Marlbog Road, Haggardstown, Dundalk, Co. Louth	44	2-6 years
Overall Existing Capacity		121 Childcare Spaces	

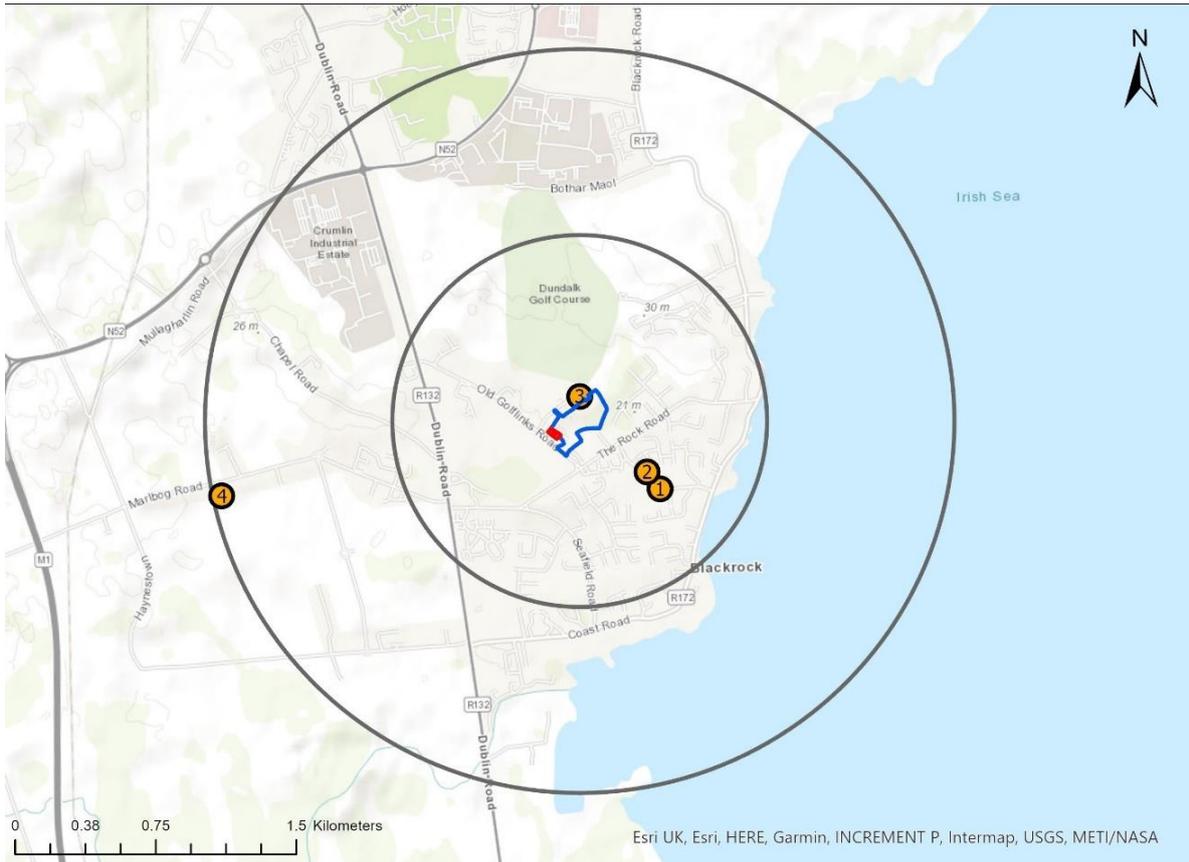


Figure 12. Location of Childcare Facilities within 1-2km of the Subject Lands (approximate boundaries of the lands outlined in red (Source: pobal.ie)

7.2 Primary Schools

There are 2 no. primary schools within one kilometre radius, and 1 no. primary school within two kilometres radius of the subject site. DOWNEY attempted to contact the schools with regard to their available capacity, however, the level of feedback was low. The feedback received did not indicate exact numbers, but having reviewed the available information online at schooldays.ie, it was suggested that there is sufficient capacity within the primary-school level in the vicinity of the site to cater for the proposed development.

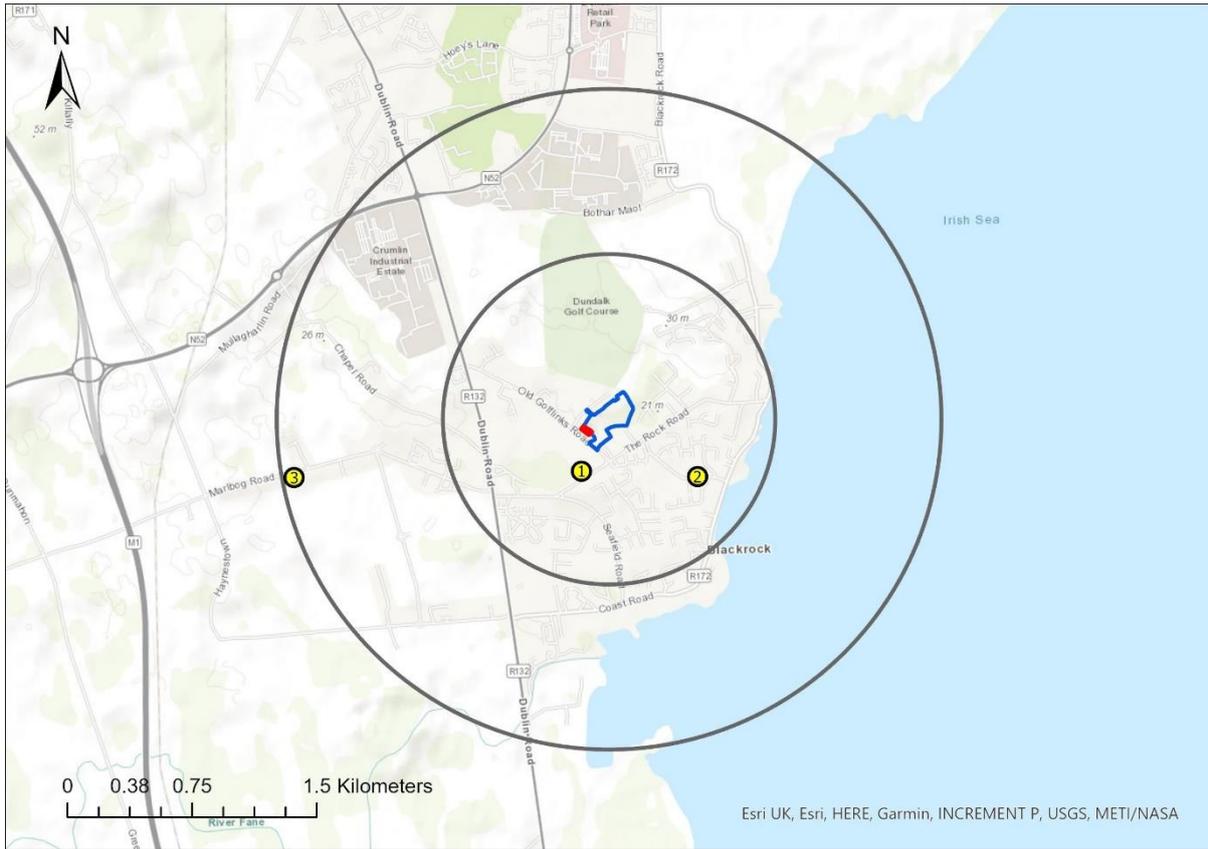


Figure 13. Location of Primary Schools (approximate boundaries of the subject site outlined in red)

Table 9. Primary Schools within 1-2km Radius of the Subject Lands (source: DoES & Schooldays.ie updated by DOWNEY)

Radius	NAME	ADDRESS	Enrolment
1km from site	St. Francis National School	St Francis National School, Rock Road, Blackrock, Co. Louth, Leinster	Boys: 233 Girls: 196
	St. Oliver Plunkett National School	Saint Oliver Plunkett National School, Sandy Ln, Haggardstown, Blackrock, Co. Louth	Boys: 228 Girls: 233
2km From Site	St. Furseys National School	Marlbog Road, Haggardstown, Dundalk CO LOUTH, Louth, Leinster	Boys: 106 Girls: 123
TOTAL			Boys: 567 Girls: 552 Total: 1,119

Therefore, DOWNEY are of the considered opinion that there is suitable capacity within and close proximity to the area at a Primary School level to accommodate the proposed development.

7.3 Post-Primary Schools

DOWNEY have researched into the nearby post-primary schools within the area and found no secondary schools within a 2km radius of the subject site at Cois Farrage, however, it is noted that numerous post-primary schools are located within Dundalk Town Centre, which can be easily accessed

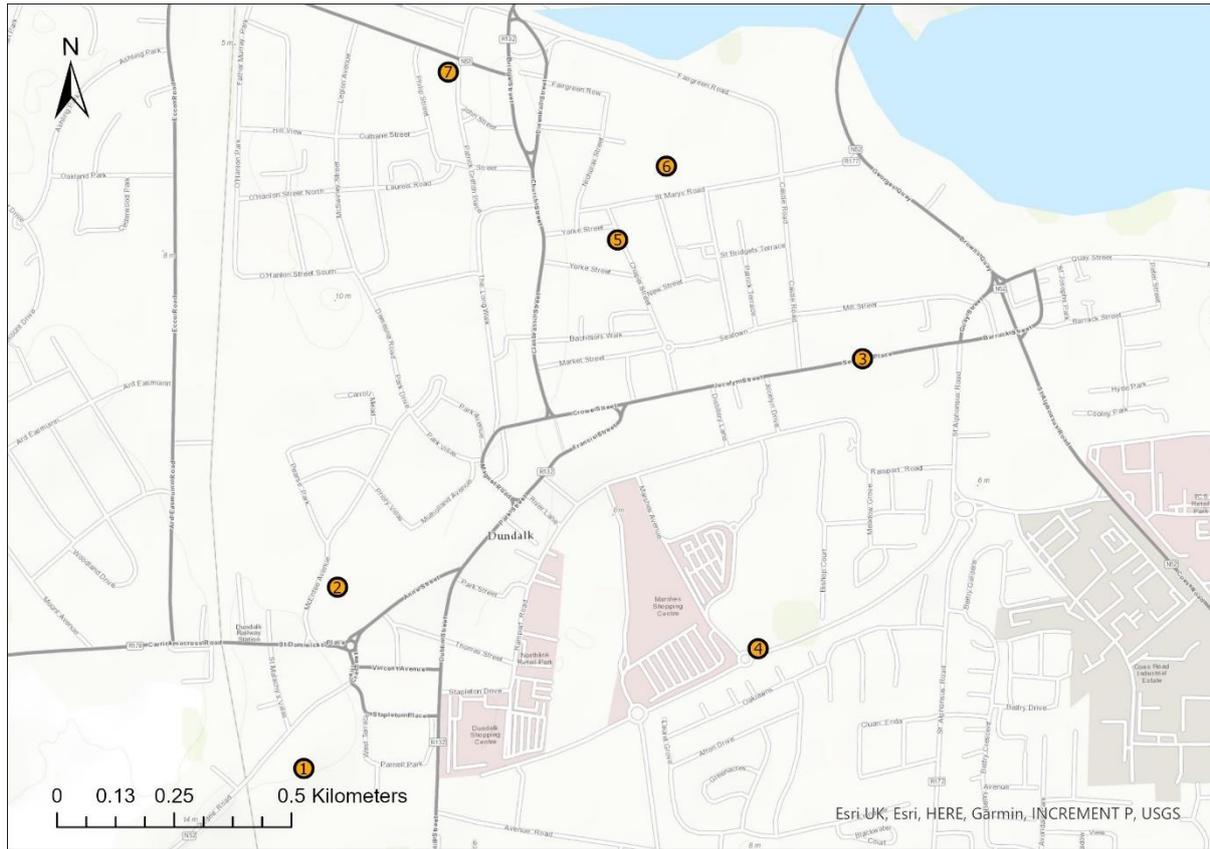


Figure 15. Location of Post-primary Schools within Dundalk Town Centre

With regard to the existing secondary schools in the area, DOWNEY are of the considered opinion that there is suitable capacity within the area at a Secondary School level to accommodate the proposed development.

Table 10. Post-primary Schools within the area (source: Schooldays.ie)

NAME	ADDRESS	Enrollment
Dundalk Grammar School	Dundalk Co Louth, Louth, Leinster	Boys: 318 Girls: 256
St. Malachys Girls School	Anne Street, DUNDALK CO LOUTH, Louth, Leinster	Boys: N/A Girls: 250
St. Vincents Secondary School	Seatown Place Dundalk Co. Louth, Louth, Leinster	Boys: N/A Girls: 905
Coláiste Chú Chulainn	Chapel Street, Dundalk, Co. Louth, Louth, Leinster	Boys: 500 Girls: 357
Coláiste Rís	Chapel Street, Dundalk, Co. Louth, Louth, Leinster	Boys: 374 Girls: 236
St Mary's College	Dundalk Co Louth, Louth, Leinster	Boys: 530 Girls: 337
Castletown Girls School	Castletown Road Dundalk Co. Louth, Louth, Leinster	Boys: N/A Girls: 188
Total		Boys: 1,722 Girls: 2,529 Total: 4,251

7.4 Recreational Facilities

Indoor Leisure & Recreational Facilities

As can be seen in Figure 16 below, there are a number of sport centres and fitness facilities, a library, and several community-related facilities within 1-2km radius of the proposed development.

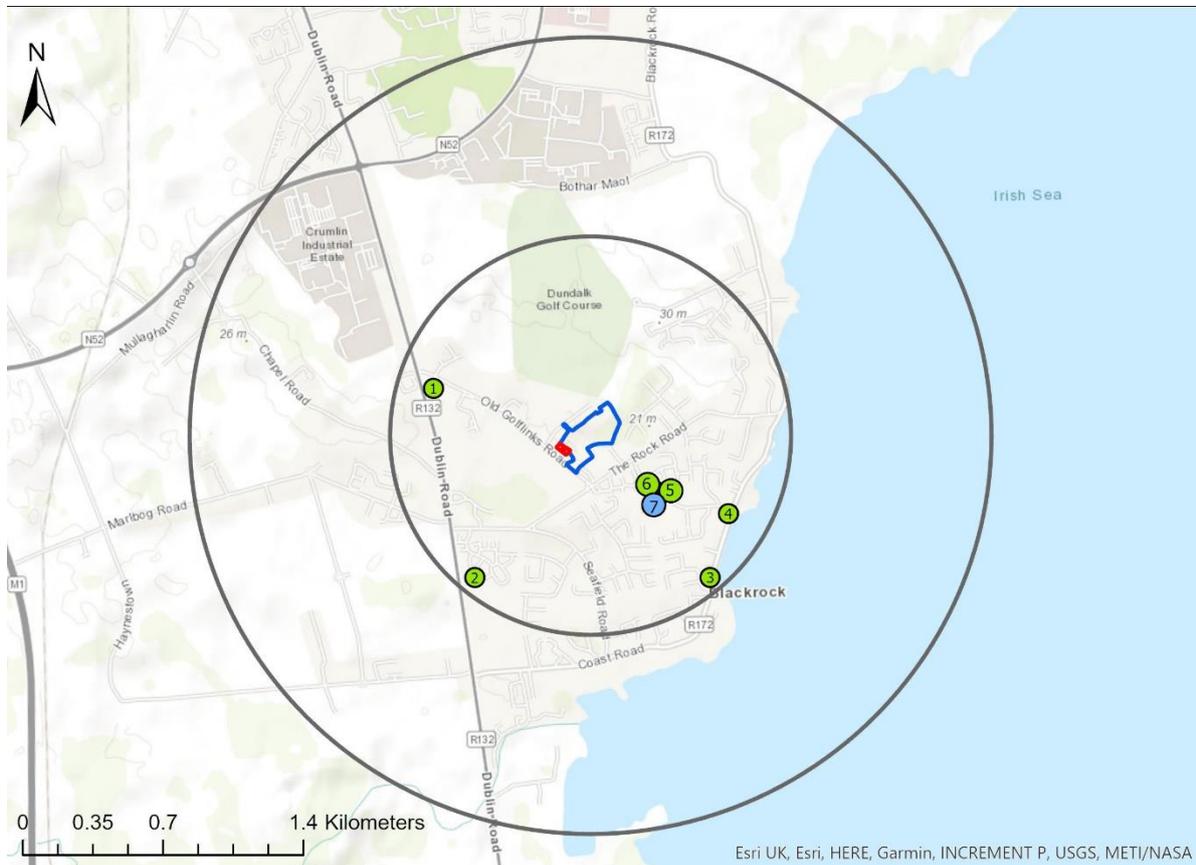


Figure 16. Location of Indoor Recreational Facilities (approximate boundaries of the subject site outlined in red)

Accordingly, there is a notable range of indoor sporting activities within 1-2km radius of the subject lands including, gyms and clubs, yoga studios, personal trainers, swimming pools, etc. Furthermore, the Felda Health, Spa and Fitness, which is located in close proximity of the subject lands, hosts a vast range of sports and activities by providing for a 25-metre swimming pool, luxurious spa, high tech gym, and various fitness facilities and classes.

Furthermore, the Haggardstown and Blackrock Community Centre is also located in close proximity to the subject site at Cois Ferraige, which hosts a range of indoor and outdoor community facilities, including studios, community rooms, and gym area.

Table 11. Indoor Leisure & Recreational Facilities within 1-2km Radius of the Subject Lands

	No.	Name	Location	Type
Gyms and Leisure Facilities	1	Felda Health, Spa, and Fitness	Dublin Road Blackrock, Dundalk, Co. Louth	Health centre

	2	Aaron Smyth Personal Trainer	19 Granagh, Haggardstown, Earlsfort, Co. Louth, A91 N24V	Personal Training
	3	Noleen Malone Integrative Health	Main St, Dundalk, Co. Louth	Yoga
	4	Zenergy Yoga Studio	Main St, Dundalk, Co. Louth	Yoga
	5	Hissy Fit Ltd.	Sandy Lane, Haggardstown, Blackrock, Co. Louth, A91 ED0F	Pilates/Run Club
	6	K Fitness	Sandy Lane, Haggardstown, Blackrock, Co. Louth, A91 ED0F	Personal Training
Community Facilities	7	Haggardstown and Blackrock Community Centre	Sandy Lane, Haggardstown, Blackrock, Co. Louth, A91 ED0F	Indoor hall, dance class, community group meetings, and gym

Outdoor Leisure & Recreational Facilities

There is a wide range of outdoor recreational facilities within the 1-2km radius of the subject site and its wider area. This includes sports clubs, sports complexes, and a variety of open green spaces. The location of subject lands is within walking distance of the subject site, indicating a good level of site accessibility to quality green open space, which provides a wide range of recreational facilities. The relevant details of these amenities are outlined in Table 12 and Figure 17 below.

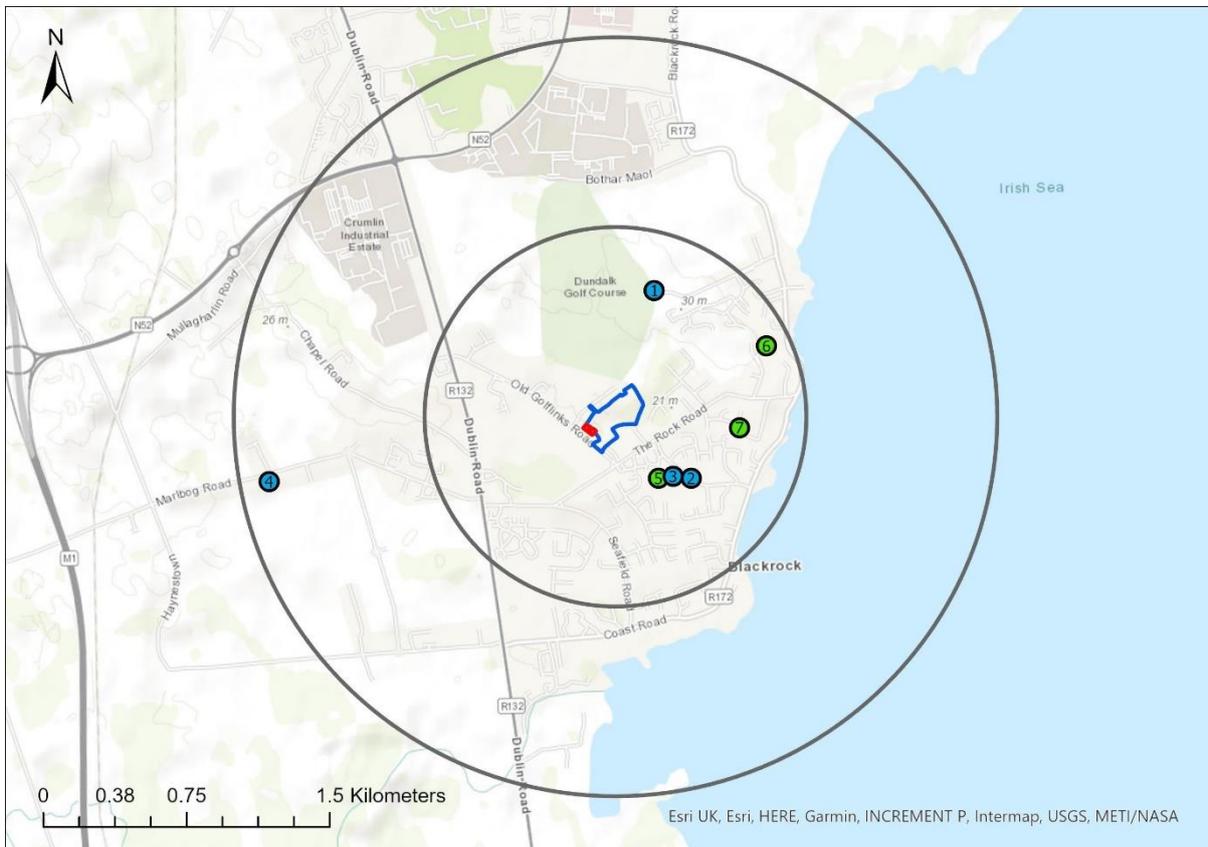


Figure 17. Location of Outdoor Recreational Facilities (approximate boundaries of the subject site outlined in red)

DOWNEY also notes that within the subject site, there is a 0.135 ha. wildflower garden to the immediate east of the proposed houses, along with further public open space provision provided within Cois Ferraige.

Table 12. Outdoor Leisure & Recreational Facilities within 1-2km Radius of the Subject Lands

	No.	Name	Location	Type
Sport Clubs & Outdoor Exercise	1	Dundalk Golf Club	New Golf Links Rd, Haggardstown, Dundalk, eCo. Louth	Golf Club
	2	Rock Celtic FC	Sandy Lan, Haggardstown, Dundalk, Co. Louth, A91 HN22	Football Club
	3	Dundalk Aikido	Blackrock Community Centre, Sandy Ln, Haggardstown, Blackrock, Co. Louth, A91 ED0F	Aikido Club
	4	Geraldines Louth GAA Club	Marlbog Road, Haynestown, Haggardstown, Co. Louth	GAA Club
Outdoor Recreational & Park Facilities	1	Blackrock Park	Haggardstown, Blackrock, Co. Louth	Park
	2	New Line	Haggardstown, Blackrock, Co. Louth	Park
	3	Elm Park	Haggardstown, Blackrock, Co. Louth	Park

Therefore, DOWNEY are of the considered opinion that there is suitable capacity within the area for the recreational and leisure facilities to accommodate the proposed development. This would be complemented by the proposed range of open green spaces within the development.

7.5 Retail Provision

The Audit will now look further into the subject site within the retail hierarchy in its wider area and Haggardstown, providing details on the number and location of retail provision within proximity of the subject site. These provide an important factor in the overall quality of life for the future residents of the proposed development.

In this regard and as illustrated in the Figures below, it is noted that the retail provision ranges from convenience food supermarkets to comparable good facilities within 1-2km of the subject site and its wider area. Further details are outlined in Table 13 below.

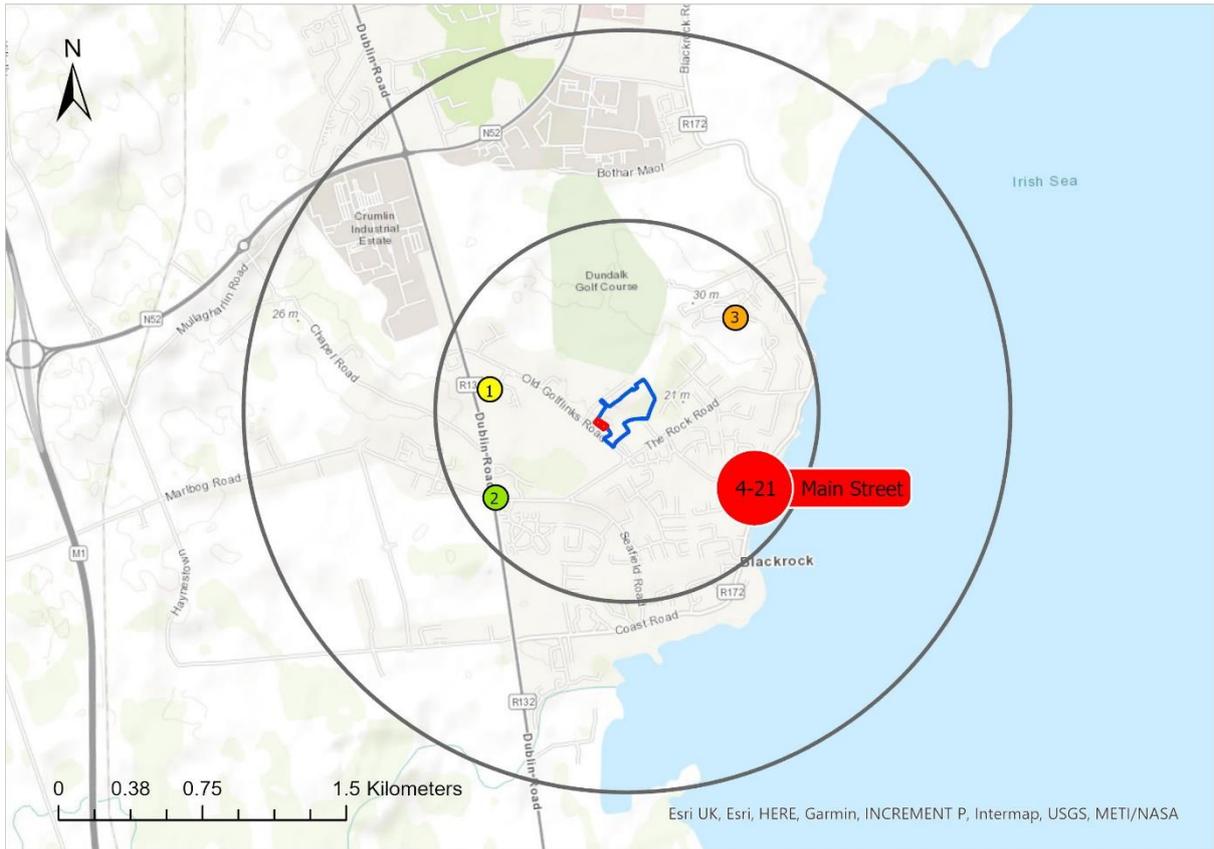


Figure 18. Subject Site within proximity of its Retail Provision (approximate boundaries of the subject site outlined in red)

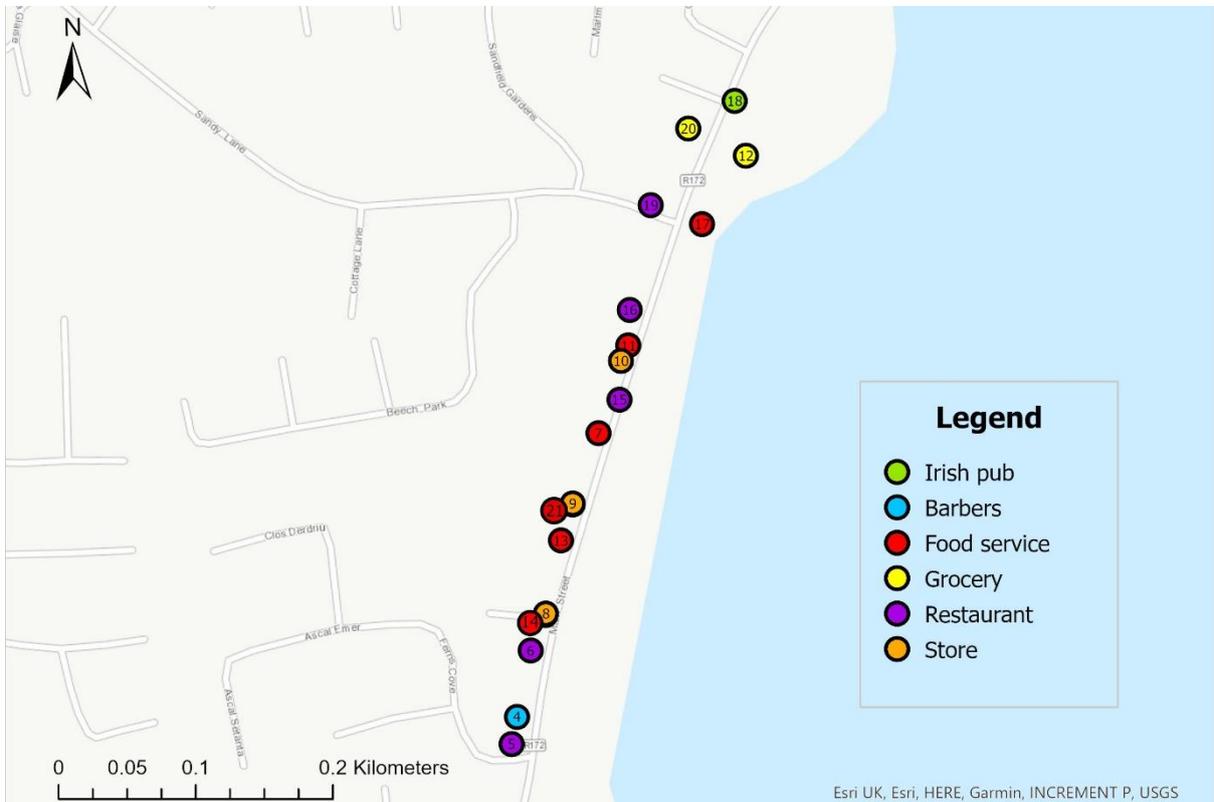


Figure 19. Retail Provision within Blackrock Main Street

It is also noted that the subject site is located only an 8-minute drive from Dundalk Retail Park, with Dundalk Town centre also located further north via the R132 and N52, providing additional amenities and retail offerings for the subject site.



Figure 20. Dundalk Retail Park

Table 13. List of Retail Facilities in Proximity of the Subject Site

No.	Name	Location	Type
1	SuperValu	Unit 1, The Fairways Centre, Dublin Rd, Haggardstown, Dundalk, Co. Louth, A91 EYX9	Grocery Store
2	Sextons Bar and Restaurant	Dublin Rd, Haggardstown, Dundalk, Co. Louth	Irish Pub
3	Rock-A-Baby Gifts	25 Marine Cres, Haggardstown, Blackrock, Co. Louth, A91 RK76	Store
4	Shortcuts Barbershop	Main St, Haggardstown, Blackrock, Co. Louth, A91 FW93	Barbers
5	The Black Wok Blackrock	Main St, Haggardstown, Blackrock, Co. Louth	Restaurant
6	The Stone House	Main St, Haggardstown, Co. Louth	Restaurant
7	Roma Takeaway Blackrock	12 Main St, Haggardstown, Blackrock, Co. Louth, A91 F8Y1	Food Service
8	Beat it Music	Main St, Haggardstown, Blackrock, Co. Louth, A91 PXA7	Store
9	Sybil Boutique	The Promenade, Main St, Haggardstown, Blackrock, Co. Louth	Store

10	The Crafty Rock	Main St, Haggardstown, Blackrock, Co. Louth	Store
11	The Village Garden	20 Main St, Haggardstown, Blackrock, Co. Louth, A91 W188	Food Service
12	Centra	Main St, Haggardstown, Co. Louth, A91 CH7A	Grocery Store
13	Besties Pizza	Main St, Haggardstown, Blackrock, Co. Louth, A91 N797	Food Service
14	Rocksalt Cafe	Main St, Haggardstown, Blackrock, Co. Louth, A91 PXA7	Food Service
15	The Brake	11 Main St, Haggardstown, Blackrock, Co. Louth, A91 H9X3	Restaurant
16	The Clermont	Main St, Haggardstown, Blackrock, Co. Louth, A91 C9K3	Restaurant
17	Wok and Roll	Main St, Haggardstown, Blackrock, Co. Louth	Food Service
18	Uncle Tom's Cabin	Main St, Haggardstown, Blackrock, Co. Louth, A91 FX45	Irish Pub
19	The Neptune	Main St, Haggardstown, Blackrock, Co. Louth	Restaurant
20	Barry's Fit Food Butchers	Haggardstown, Blackrock, Co. Louth	Grocery Store
21	The Home Bakery	Main St, Haggardstown, Blackrock, Co. Louth	Food Service

In light of the above, DOWNEY is of the considered opinion that there is adequate and diverse retail provision catering for the influx of new population into the area, which the proposed development would also help to sustain these existing facilities.

7.6 Healthcare Facilities

As shown in Figure 21 below there is a wide range of healthcare facilities within 2km radius of the subject site and its wider area. This includes health centre, GP clinics, pharmacies, dental practice, and nursing home. The relevant details on the healthcare provision in the area is listed in Table 14 below. DOWNEY also notes that Louth County Hospital is located within Dundalk Town Centre, only 3.2km to the north of the subject site.

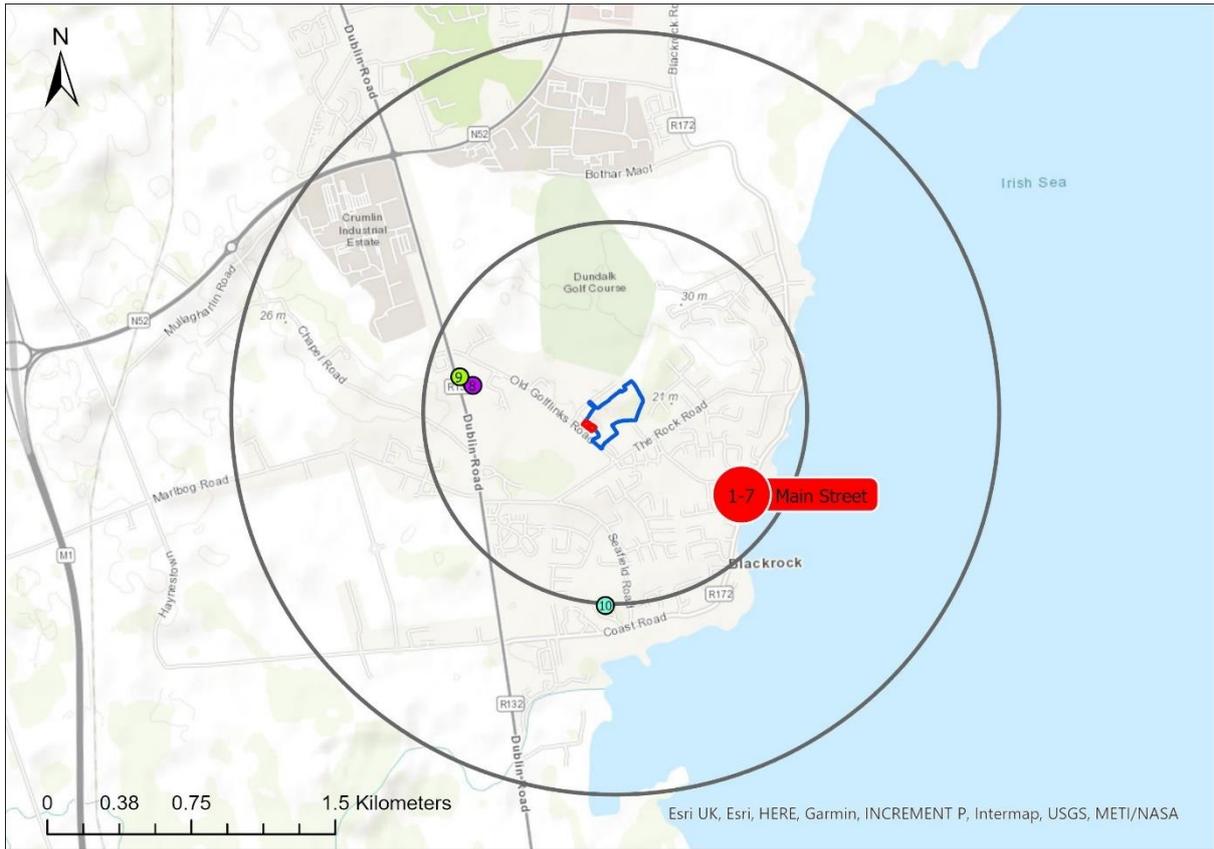


Figure 21 Location of Healthcare Facilities within 1-2km Radius of the Subject Site

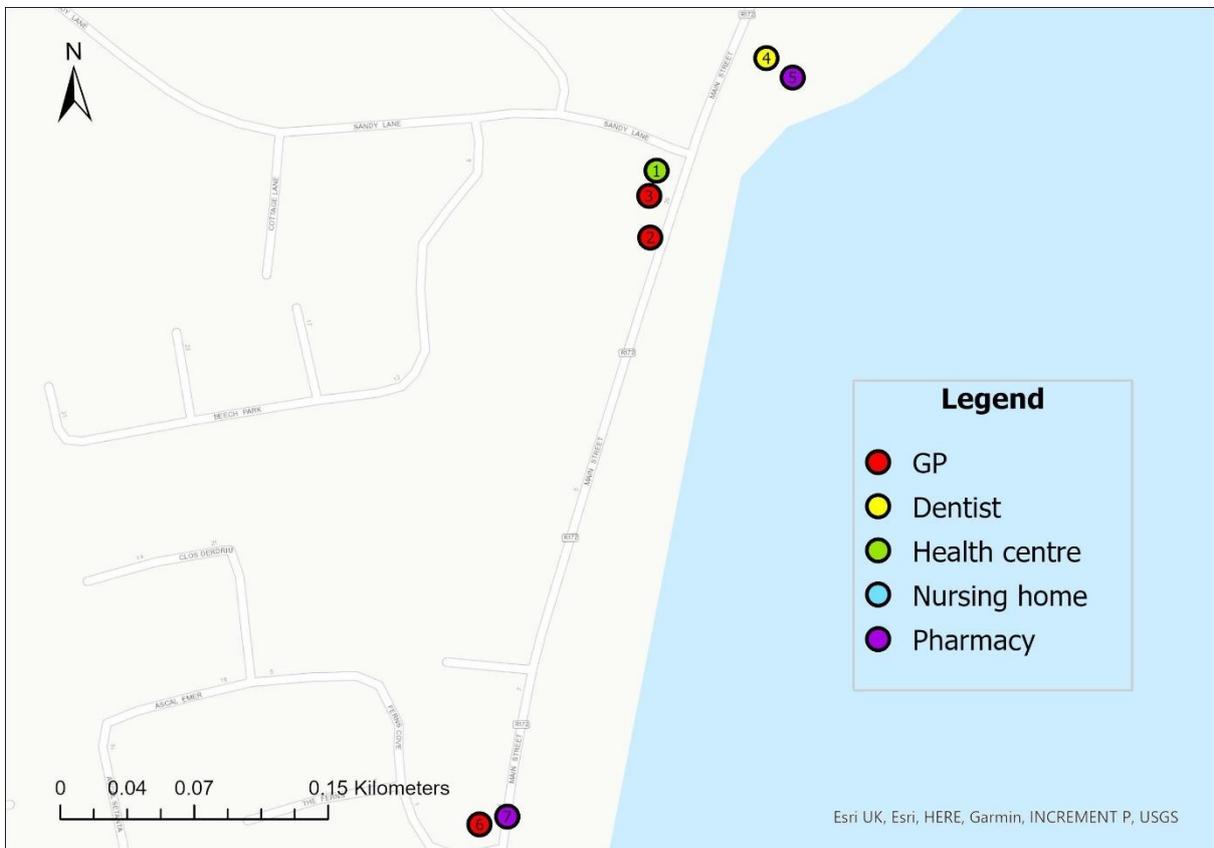


Figure 22. Location of Healthcare Facilities along Blackrock Main Street

Table 14. List of Healthcare Facilities in Proximity of the Subject Site

	Name	Location	Type
1	All Care Clinic	North Star House, Main St, Haggardstown, Blackrock, Co. Louth	Health Centre
2	Blackrock Family Practice	Main St, Haggardstown, Blackrock, Co. Louth	General Practice
3	Dr Sunita Ramachandran General Practice	Unit 1 Main Street Blackrock, Dundalk, Co. Louth, A91 DX6K	General Practice
4	Blackrock Dental Surgery	1st Floor, Blackrock Village Centre, Main St, Blackrock, Co. Louth	Dental Practice
5	Allcare Pharmacy Blackrock	Main St, Haggardstown, Blackrock, Co. Louth, A91 RP3F	Pharmacy
6	South Beach Medical Centre	Main St, Haggardstown, Blackrock, Co. Louth	General Practice
7	McQuillan's Pharmacy	1 Main St, Haggardstown, Blackrock, Co. Louth, A94 Y9C1	Pharmacy
8	Clermont Health	Dublin Rd, Haggardstown, Co. Louth	Health Centre
9	McCormacks Pharmacy	3 Fairways Shopping Centre, Dublin Rd, Haggardstown, Dundalk, Co. Louth	Pharmacy
10	Blackrock Abbey Nursing Home	Ard Shee, Haggardstown, Co. Louth	Nursing Home

7.7 Religious and Community Provision

There are 4 no. religious centres in the area including Church of Ireland, Islamic and Catholic churches within the 2km radius of the site, which would provide religious and community support, which is summarised as below.

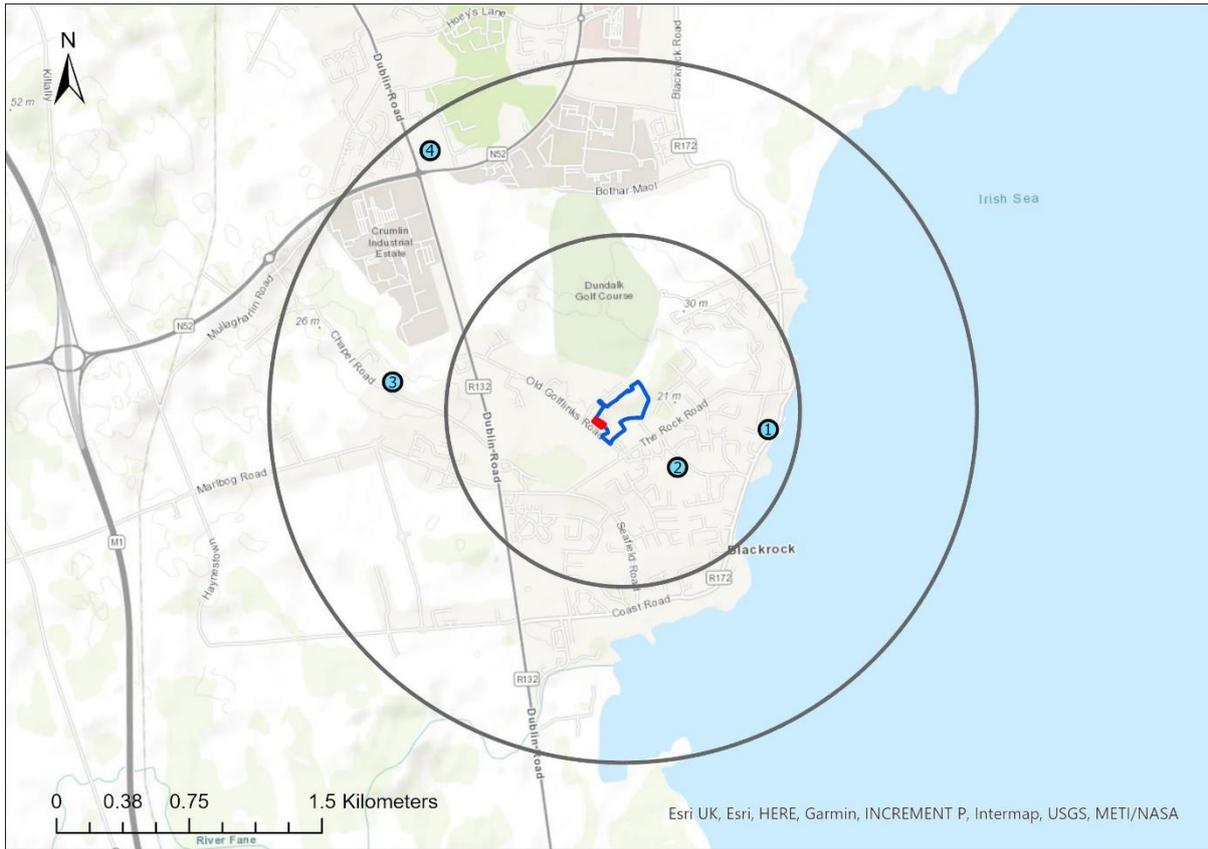


Figure 23. Location of Religious & Community Facilities within 1-2km Radius of the Subject Site and its Wider Area (approximate boundaries of the subject site outlined in red)

Taking into consideration the scale of the proposal, and the influx of new population into the area, the existing facilities prove to be sufficient and meet the needs of the proposed development.

Table 15. List of Religious & Community Facilities in Proximity of the Subject Site

No.	Name	Location	Type
1	Church of St Oliver Plunkett	Blackrock, Sea Rd, Haggardstown, Blackrock, Co. Louth	Catholic Church
2	Encounter Fellowship Church	Community Center, Sandy Ln, Haggardstown, Blackrock, Co. Louth, A91 ED0F	Christian Church
3	St Fursey's Catholic Church	Chapel Rd, Haggardstown, Co. Louth	Catholic Church
4	DKIT Prayer/ Islamic Society	DKit, Marshes Upper, Dundalk, Co. Louth	Islamic prayer centre

It is therefore submitted that considering the population and demographic trends set out above, and given that the subject application is for the provision of 4 no. houses only, there are sufficient community and social infrastructure within the immediate surrounding area, along with the wider Blackrock area. It is also noted that the subject site is located in close proximity to Dundalk Town Centre and is easily accessible via the N52, and via public transport, with a bus stop only 1km from the subject site.

8.0 ENGINEERING PROPOSALS

Within the parent permission (ABP Ref. 303253-18), a full civil engineering pack was submitted to accompany the application, this included all relevant drainage details as well as a Flood Risk Assessment which the planning authority are invited to refer to.

The subject amendment application is seeking permission for only 4 no. houses which are to be relocated to the application area. As such, an updated Site-Specific Flood Risk Assessment has been prepared by TOBIN Consulting Engineers, which confirms that the site is not at any risk of flooding. The proposed development will provide for connections to existing drainage infrastructure and provide for similar SuDS measures as is being implemented across the site. The applicant has also obtained a Confirmation of Feasibility (COF) letter from Uisce Éireann which confirms that connections are feasible.

9.0 ENVIRONMENTAL CONSIDERATIONS

9.1 Appropriate Assessment Screening

An updated Appropriate Assessment Screening has been prepared by Openfield Ecology to accompany the subject amendment application. Given the nature of the project and implementation of best practice construction measures particularly in relation to protection of water quality, it is concluded that the development will not result in any significant impact on any European Sites and a full Appropriate Assessment is not required. The AA screening includes the following conclusion:

On the basis of the screening exercise carried out above, it can be concluded that the possibility of any significant impacts on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.

Louth County Council are invited to refer to the AA screening submitted under separate cover of the application, along with the AA Screening and NIS submitted with the parent permission (ABP Ref. 303253-18) for further details in this regard.

10.0 CONCLUSION

DOWNEY, Chartered Town Planners, have prepared this Planning Statement on behalf of our client and the applicant, Westdalk (ROI) Ltd., to accompany a proposed Largescale Residential Development (LRD) application on lands at Old Golf Links Road, Blackrock, Co. Louth. The proposed development subject to this LRD application is seeking permission for an amendment to the previously permitted SHD Application on site (ABP Ref. 303253-18). The subject amendment application provides for the relocation and construction of 4 no. 3-bedroom houses with revised house types to that permitted, open space relocation, and all associated site infrastructure and engineering works necessary to facilitate the development.

The proposed development will provide for a sustainable residential development on appropriately zoned lands, in an accessible location within the development boundaries of Blackrock, which would promote compact urban growth and a good quality of life. This in turn will further support compact

growth of the town itself and assist in meeting the increasing demand for residential accommodation in Blackrock, Dundalk and the overall Louth County.

The design of the proposed scheme has been the subject of a full analysis/feasibility study of the proposed site beginning at the SHD application permitted under ABP Ref. 303253-18. Within the parent permission, An Bord Pleanála granting permission for 158 no. houses and construction has commenced on this, which is nearing completion. During the course of the construction, archaeological remains were found within an area intended to accommodate 4 no. houses. As such, these houses were not built, and a Public Open Space area has been developed instead. The applicant is now seeking to re-instate these 4 no. houses in an alternative location, as per the subject LRD application. These 4 no. houses will still provide a total of 158 no. housing units within Cois Ferraige, as has been permitted within the parent permission application (ABP Ref. 303253-18

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area and as such, it is considered that the proposed development at Blackrock represents a high-quality housing development proposal which is now being submitted for the consideration of Louth County Council. DOWNEY trust that the enclosed plans and particulars pertaining to this application are in order and look forward to a favourable decision from Louth County Council in due course.

PART B – STATEMENT OF CONSISTENCY WITH PLANNING POLICY

The following demonstrates that the proposed development is consistent with the relevant national, regional, and local planning policy. This should be read in conjunction with the accompanying detailed documentation prepared by the Design Team.

1.0 NATIONAL PLANNING POLICY

The key provisions of the national planning policy, including Section 28 Guidelines, as it relates to the proposed development are now set out in the following section. These are as follows:

- Project Ireland 2040: National Planning Framework First Revision 2025
- Project Ireland 2040: National Development Plan 2021-2030
- Housing for All; A New Housing Plan for Ireland
- Housing for All; Action Plan Update & Q2 2024 Progress Report
- Affordable Housing Act 2021 & Housing Circular 28/2021
- Sustainable Residential Development & Compact Settlement Guidelines for Planning Authorities, January 2024
- Childcare Facilities: Guidelines for Planning Authorities, June 2001 Design Manual for Urban Roads and Street (DMURS)
- Design Manual for Urban Roads and Streets (DMURS)
- Smarter Travel: A sustainable Transport Future
- EIA Directive
- Birds and Habitats Directive – Appropriate Assessment
- The Planning System and Flood Risk Guidelines, 2009
- All-Ireland Pollinator Plan 2021-2025
- Climate Action Plan, 2025

1.1 Project Ireland 2040; National Planning Framework First Revision 2025

The Final Draft Revised National Planning Framework was published on 8th April 2025 and approved by both houses of the Oireachtas on 30th April 2025.

As set out in the Revised NPF, *“This Framework is revised and updated to take account of changes that have occurred since it was published in 2018 and to build on framework that is in place. It is a framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment – from our villages to our cities, and everything around and in between.”*

The Revised NPF goes on to add, *“In the period between 2022 and 2040 it is expected that there will be roughly an extra one million people living in our country. This population growth will require new jobs and new homes. If we fail to plan for this growth and for the demands it will place on our built and natural environment, as well as on our social and economic fabric, then we will certainly fail in our responsibility to future generations of Irish men and Irish women. That responsibility is to ensure their prosperity and happiness in an ever-changing world.”* In this regard, the Plan sets its vision by:

- *“Developing a region-focused strategy for managing growth; linking this to the Project Ireland 2040 National Development Plan;*
- *using public and private lands for certain strategic purposes with a more active approach to the management of land;*
- *supporting this with strengthened, more environmentally focused planning at local level; and backing the framework up in law, with oversight by the Office of the Planning Regulator in the overall context of Ireland’s existing international and EU obligations and commitments.”*

The Revised National Planning Framework (NPF) maintains the same approach as the adopted Plan regarding the spatial distribution of growth across the State.

National Policy Objective 8: *“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.”*

National Policy Objective 9: *“Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.”*

National Policy Objective 10: *“Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high-capacity public transport and located within or adjacent to the built-up area of the five cities or a metropolitan town.”*

The Plan goes on to outline the key national targets for structuring overall national growth, promoting regional parity, building accessible centres of scale and securing compact and sustainable growth as per the following Table.

Table 2.1 | The NPF at a Glance: Targeted Pattern of Growth, 2022 to 2040

National Policy Objective	Eastern and Midland	Southern	Northern and Western
1. Growing Our Regions	Approximately 470,000 people (3m total) (690,000 people over 2016)	Approximately 330,000 people (2m total) (450,000 people over 2016)	Approximately 150,000 people (1m total) (210,000 people over 2016)
2. Building Stronger Regions: Accessible Centres of Scale	Dublin City and Suburbs: + 295,000 people (at least 1.56 million in total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region, leading with the key role of Athlone in the Midlands and the Drogheda-Dundalk-Newry cross-border network	Cork City and Suburbs: + 96,000 people at least 320,000 in total) Limerick City and Suburbs: 44,000 people (at least 150,000 in total) Waterford City and Suburbs: + 28,000 people (at least 88,000 in total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region	Galway City and Suburbs: + 36,000 people (at least 122,000 in total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region, leading with the key role of Sligo in the North-West, Athlone in the Midlands and the Letterkenny-Derry cross-border network.
3. Compact, Smart, Sustainable Growth	50% of new city housing within existing Dublin City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints	50% new city housing on within existing Cork, Limerick and Waterford Cities and Suburbs footprints 30% all new housing elsewhere, within existing urban footprints	50% of new city housing within existing Galway City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints

In light of the above, it is submitted that the proposed development will contribute to achieving these targets, as it assists in delivering appropriately zoned lands at Cois Ferraige, located within Blackrock and south of Dundalk Town Centre. This approach is in alignment with the Revised NPF, and it is therefore requested that planning permission be granted.

1.2 Project Ireland 2040: The National Development Plan 2021-2030

The National Development Plan (NDP) sets out the investment priorities that will underpin the successful implementation of the NPF. This will guide national, regional, and local planning and investment decisions in Ireland over the next two decades to cater for an expected population increase of over 1 million people.

Resolving the systemic factors underlying the current housing crisis is at the heart of the NDP and reflecting this, housing and sustainable urban development is a priority for the National Development Plan. In this regard, the NDP states that there is a *“need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis.”*

Furthermore, the NDP states that *“the continuation of existing patterns of development accentuates the serious risk of economic, social, and environmental unsustainability through, for examples, placing more distance between where people work and where people live, and increasing energy demand. The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse.”*

There are a number of strategic outcomes identified within the NDP which support the proposed development at the subject site. Such outcomes include:

National Strategic Outcome 1: Compact Growth – *“This outcome aims to secure the sustainable growth of more compact urban and rural settlements supported by jobs, houses, services, and amenities, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and co-ordinated investment in urban, rural, and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns, and villages. This will give scope for greater densities that are centrally located and, in many cases, publicly owned, as well as bringing life and economic activity back into our communities and existing settlements. Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in creating more attractive places for people to live and work in, facilitating economic growth and employment creation by increasing Ireland’s attractiveness to foreign investment and strengthening opportunities for indigenous enterprise”.*

National Strategic Outcome 4: Sustainable Mobility – *“The expansion of attractive and sustainable public transport alternatives to private based car transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision of safe alternative active travel options such as segregated cycling and walking facilities can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure”.*

The proposed development at the subject site is consistent with the NDP as it involves the consolidation of a strategic location within the Blackrock and Dundalk area. The proposed development will provide high quality, sustainable residential development, in an appropriate location, all of which promotes compact urban growth and good quality of life. The development will be an attractive, vibrant urban centre for people to live in, supported by high-quality physical and social infrastructure as well as vast recreational amenities within the surrounding area. DOWNEY therefore request that Louth County Council grant permission for the subject amendment application.

1.3 Housing for All; A New Housing Plan for Ireland

The Housing for All: A New Housing Plan for Ireland states that Ireland’s housing system is not meeting the needs of enough of our people, and therefore, it needs to increase new housing supply to an average of at least 33,000 new units per year over the next decade. This will include over 10,000 social homes each year over the next five years, with 9,500 of these being new-builds, and an average of 6,000 affordable homes for purchase or rent. As per, Housing for All provides four pathways to achieving four overarching objectives:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*

- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

Outlined in the Plan, the State must act decisively to increase supply of both private and public housing. An average of 33,000 homes must be provided every year between now and 2030. Increased housing output is needed in all sectors - private, affordable, and social - to meet the needs of people in a wide variety of circumstances.

It is submitted that provision of 4 no. residential units on the subject site, where construction is on-going for the parent permission (ABP Ref. 303253-18 of 158 no. houses), will help the Government to achieve the objectives of the Housing for All Plan in increasing the housing output. Therefore, it is considered that the proposed development is consistent with the development framework in this regard.

1.4 Housing for All; Action Plan Update & Q2 2024 Progress Report

Published in July 2024, the Action Plan Update & Q4 2024 Progress Report on Housing for All acknowledges the significant increase in the housing supply with almost 32,000 new homes completed between April 2023 and March 2024, noting a continued rise in the number of houses being completed. The report goes on to add, 32,000 new homes commenced construction in the first five months of 2024.

In this context and considering our client's (the applicant's) track record, it is submitted that the proposed development of an additional 4 no. houses will play a significant role in completing the development of the appropriately zoned lands at Cois Ferraige, Blackrock. This development will also contribute to meeting the broader housing targets within the County driven by the national level policy.

1.5 Affordable Housing Act 2021 & Housing Circular 28/2021

In July 2021, the Affordable Housing Act 2021 was published, aiming to address problems associated with the high cost of housing for the portion of the population that do not qualify for social housing. Having come into effect on 3rd September 2021, the Housing Circular 28/2021, amends Part V of the Planning and Development Act 2000. The Programme for Government contained commitments in relation to expanding Part V to encompass affordable purchase and cost rental units and introducing affordable homes requirements to Part V.

Part 6 of the Affordable Housing Act 2021, which was enacted on 21 July 2021, gives effect to this commitment. The principal change to Part V made by these amendments is to increase the Part V contribution for new housing developments from 10% social housing to a mandatory 20% requirement, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing. It is noted that these changes to Part V primarily apply to land purchased on or after 1 August 2021. Any new planning permissions for housing development on that land will have a 20% Part V requirement. However, a 10% Part V requirement will apply where land already has planning permission or was purchased between 1st September 2015 and 31st July 2021, and planning permission is granted before 31st July 2026.

It is considered that the proposed development is consistent with the Affordable Housing Act 2021, Housing Circular 28/2021, and the requirements under Part V of the Act as it is proposed to provide 20% of the housing units for social and affordable housing. Following on from the decision to grant permission for the parent permission SHD, ABP Ref. 303253-18, the applicant has been in on-going discussions with Louth County Council to provide appropriate Part V provisions within the wider Cois Ferraige housing estate. It is submitted that this satisfies the provision of Part V for the development.

1.6 Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, Jan 2024

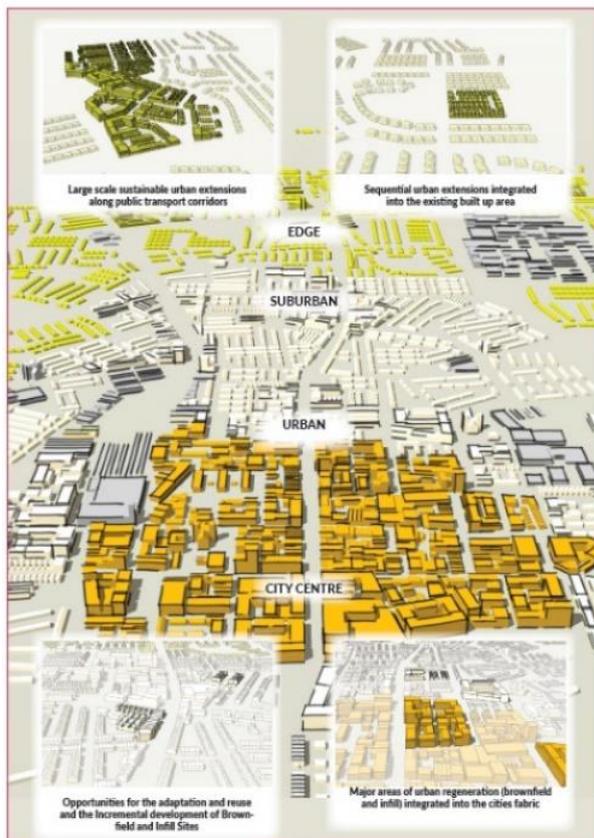
Adopted in January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities outline national planning policies focused on sustainable residential growth and the development of compact settlements in both urban and rural areas. These guidelines, which replace the 2009 Sustainable Residential Developments in Urban Areas Guidelines, have been updated to reflect current government policies and broader economic, social, and environmental considerations. They align with the NPF and provide detailed guidance on settlement growth priorities, residential density, urban design, and placemaking. Additionally, the guidelines introduce flexible development standards to support a wider range of housing options tailored to the specific context of various settlement sizes, from cities to smaller towns and villages.

Issued by (then) Minister Darragh O'Brien and Minister Kieran O'Donnell under Section 28 of the Planning and Development Act 2000 (as amended), these guidelines are mandatory for planning authorities and An Bord Pleanála (now An Coimisiún Pleanála), ensuring consistency with specific planning policy requirements (SPPRs) as part of their statutory functions.

The sustainable Development and Compact Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. They build on and update previous guidance to take account of current Government policy and economic, social, and environmental considerations.

As outlined in the Guidelines, the Government policy continues to support a tiered approach to residential density, similar to the framework established in the 2009 Sustainable Residential Development in Urban Areas Guidelines. This approach promotes the highest residential densities in central and accessible urban locations, with overall development becoming more compact and sustainable. In summary, key housing standards outlined in Guidelines include:

Figure 3.2:
Illustration of typical area types and key areas of growth within cities.



- Reduced minimum separation distances (22m to 16m).
- Reduced minimum private open space standards.
- Reduced car parking. Cycle parking provision.
- New residential development should allocate 10-15% of the net site area for public open space, with the provision of public parks.
- Private open space requirements range from 20-50sqm, varying by house size, with options for reduction if semi-private open space is available.

The proposed development complies with the above policies as follows:

- Separation distances of 16-metres are provided between the front of the proposed houses and the front of the existing houses (no existing houses located to the rear).
- Private Open spaces range 46 sq. m. to 107 sq. m. in size to the rear of each house.
- Each housing units is serviced by 1 no. car parking space.
- A 0.135ha. public open space has been provided to the immediate east of proposed houses

For further details on the proposed development's consistency with the Criteria Assessment, please refer to the Architects Design Statement and HQA, prepared by DWDS Architects, submitted under separate cover of the application.

1.7 Childcare facilities: Guidelines for Planning Authorities, 2001

Government policy on childcare is to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. These Guidelines for Planning Authorities on Childcare Facilities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

For housing schemes, the Guidelines provide a benchmark provision of 1 no. 20 space childcare facility per 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The recommendations provided within the Guidelines must be considered in the context of the 'Sustainable Urban Housing: Design Standards for New Apartments' (2023), which state that:

"Notwithstanding the Department's Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile for the area."

Within the parent permission of the subject site, ABP Ref. 303253-18, permission was granted for a 250 sq. m. creche to cater for the proposed development. This creche is currently under construction and is due for completion by the end of 2025. DOWNEY also notes that the proposed 4 no. houses will not increase in the total amount of housing units granted under ABP Ref. 303253-18, as 4 no. houses were previously omitted following archaeological findings on the subject site, where 4 no. houses were granted to be located. It is therefore respectfully submitted that the creche previously permitted

on-site (and now under construction) is sufficient to cater for the 4 no. houses proposed within this amendment application.

1.8 Design Manual for Urban Roads and Streets (DMURS)

The Design Manual for Urban Roads and Streets (DMURS) 2013 and as updated in 2023 sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The proposed development is seeking permission to provide 4 no. houses located along an existing road, previously granted and constructed under ABP Ref. 303253-18 which complies with DMURS Guidelines.

1.9 Smarter Travel: A Sustainable Transport Future

In summary, Smarter Travel: A Sustainable Transport Future states that *“to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility.”*

The five key goals of this transport policy are as follows:

- *Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport.*
- *Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.*
- *Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions.*
- *Reduce overall travel demand and commuting distances travelled by the private car.*
- *Improve security of energy supply by reducing dependency on imported fossil fuels.*

It is considered that the proposed development complies with Smarter Travel: A Sustainable Transport Future. The proposed development is seeking permission for 4 no. houses within an existing residential area granted under ABP Ref. 303253-18 for 158 no. houses. This site is located only 950-metres from Seafield Road Bus Stop providing bus services to and from Dundalk Town Centre. The proposed houses also include provisions for bicycle parking within the rear private garden of each home to encourage the use of sustainable modes of transportation. In light of the above, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation.

1.10 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require

consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

An EIA Screening Report was prepared and submitted within the parent permission ABP Ref. 303253-18 which confirms that a full EIAR was not required to accompany the application noting the mandatory requirements for an EIA. The proposed development does not meet the threshold for an EIA and as such does not require an Environmental Impact Assessment to be undertaken.

1.11 Birds and Habitats Directive – Appropriate Assessment

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). Openfield Ecology have prepared a report for Screening for Appropriate Assessment which concludes that a Natura Impact Statement (NIS) is not required in this instance.

For further information in this regard, please refer to the Appropriate Assessment report prepared by Openfield Ecology and submitted under separate cover.

1.12 The Planning System and Flood Risk Guidelines, 2009

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered and the risks should be mitigated and managed through location, layout, and design of the development to reduce flood risk to an acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a site-specific flood risk assessment.

In accordance with these Guidelines, a flood risk assessment has been prepared by Tobin Consulting Engineers and submitted under separate cover of this application. The various sources of flooding have been reviewed, and the risk of flooding from each source has been assessed. Where necessary, mitigation measures have been proposed. As a result of the proposed mitigation measures, the residual risk of flooding from any source is low. Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy. For further information in this regard, we respectfully invite the Council to refer to the enclosed Flood Risk Assessment report prepared by Tobin Consulting Engineers IE Consulting.

1.13 All-Ireland Pollinator Plan 2021-2025

The All-Ireland Pollinator Plan is a shared plan of action which is to bring about a landscape where pollinators can flourish over 2021-2025. To achieve this, the Plan sets out six objectives; (1) Making farmland pollinator friendly, (2) Making public land pollinator friendly, (3) Making private land

pollinator friendly, (4) All-Ireland Honeybee Strategy, (5) Conserving rare pollinators, and (6) Strategic coordination of the Plan.

With respect to the aforementioned, the proposed development has taken into consideration the All-Ireland Pollinator Plan, reflecting the relevant guidelines and proposed measures by providing for an internal network of landscaped open spaces. Moreover, these high-quality landscaped areas retain the existing trees and hedgerows, along with the 0.135ha. wildflower garden to the immediate east of the proposed houses. Please refer to the architectural drawings submitted under separate cover for further details on inclusion of the Plan guidelines within the proposed landscape of the scheme.

1.14 Climate Action Plan, 2025

The Climate Action Plan 2025 is Ireland's strategic response to the escalating climate crisis, building on previous iterations to set more ambitious targets for reducing greenhouse gas emissions and transitioning to a climate-resilient, low-carbon economy. The plan outlines a comprehensive roadmap for achieving a 51% reduction in emissions by 2030 and reaching net-zero by 2050. It emphasises the critical nature of immediate and sustained action across all sectors, including energy, transport, agriculture, and industry, to mitigate the impacts of climate change. The plan also underscores the importance of a just transition, ensuring that the shift to a greener economy is equitable and inclusive, leaving no community behind.

The Climate Action Plan places significant emphasis on the role of new developments in contributing to Ireland's climate goals. It acknowledges that the construction and operational phases of new developments can have substantial impacts on the environment and climate. Therefore, the plan mandates that all new developments must integrate climate adaptation and mitigation strategies from the outset.

Moreover, the plan calls for new developments to contribute to the broader goal of reducing emissions across all sectors. For example, in the built environment, new residential and commercial buildings must be designed to minimise their carbon footprint through energy efficiency measures and the use of sustainable materials.

In the context of transport and infrastructure, the plan stresses the need for new developments to support sustainable mobility. This includes the provision of infrastructure that promotes walking, cycling, and the use of public transport, thereby reducing reliance on private vehicles and associated emissions. By embedding these considerations into the planning and design of new developments, the Climate Action Plan 2024 aims to ensure that Ireland's growth and development align with its climate commitments, ultimately contributing to a more sustainable and resilient future.

With respect to the above, the proposed development takes careful consideration of the site's context. In line with the plan's emphasis on sustainable and resilient development, the scheme proposes a compact residential development with appropriate density which integrates significant green space, within the site. By promoting a compact urban form in a "less vulnerable area", the development adheres to the principles of sustainability and resilience outlined in the Framework, ensuring that it contributes positively to Ireland's climate goals.

2.0 REGIONAL PLANNING POLICY

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031

2.1 Regional Spatial and Economic Strategy for the Eastern & Midland Region 2019-2031

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the NPF for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures, and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment, and infrastructure capacity.

In conjunction with the NPF, the RSES predicts Dublin City and Suburbs to experience continued population growth over the period 2019-2031 with a predicted increase of 220,000. The NPF key growth enables focus on the facilitation of collaboration to support the development of the Dublin to Belfast economic corridor, to drive synergy in the Drogheda-Dundalk-Newry cross border network and to target significant growth in the Regional Growth Centres, including Drogheda and Dundalk. This will enable them to act as regional drivers, with a focus on improving local economies and quality of life to attract investment and the preparation of urban area plans (UAPs). This includes achieving compact growth targets of at least 30% of all new homes to be within the existing built-up area of settlements. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal are the following:

Regional Policy Objective (RPO) 3.1: *“Key stakeholders including local authorities in the Region shall, through their policies and objectives including development plans, commit to the delivery of the Growth Strategy as detailed in the RSES.”*

Regional Policy Objectives (RPO) 3.2: *“Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.”*

Regional Policy Objective (RPO) 4.8: *“Support the regeneration of underused town centre and brownfield / infill lands along with the delivery of existing zoned and serviced lands to facilitate significant population growth and achieve sustainable compact growth targets of 30% of all new homes to be built within the existing built-up urban area.”*

Regional Policy Objective (RPO) 4.19: *“A statutory Urban Area Plan (UAP) shall be prepared by Louth County Council for the Regional Growth Centre of Dundalk in collaboration with the EMRA. The UAP will support the development of Dundalk as an attractive, vibrant and highly accessible Regional Centre and economic driver. The UAP*

will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.”

Regional Policy Objective (RPO) 4.21: *“Enhance Dundalk’s role as a strategic employment centre on the Dublin-Belfast Economic Corridor and provide for employment opportunities through identification of suitable sites for new industry including FDI.”*

Regional Policy Objective (RPO) 4.23: *“Enhance potential for economic development and regeneration at Dundalk Port / Harbour area subject to a feasibility study and appropriate coastal zone management.”*

Regional Policy Objective (RPO) 4.26: *“Core strategies in Local Authority development plans shall support objectives to achieve a minimum of 30% of development in key towns by way of compact growth through identification of key sites for regeneration.”*

Regional Policy Objective (RPO) 6.3: *“Support the effective planning and development of large centres of population and employment along the main economic corridor, in particular Drogheda and Dundalk.”*

The proposed development is located on already serviced zoned lands and will essentially form part of the Cois Ferraige development, which is currently under construction, thus providing for a residential development in proximity to a range of services and amenities within the Blackrock area. It is submitted that the provision of a high-quality mixed-use development consisting of the proposed 4 houses as a part of this amendment application will assist in achieving the aforementioned objectives as a part of the wider development (ABP Ref. 303253-18) and it also complies with the pertaining policies and standards. For further details on how the proposed development is in accordance with these policies, please refer to the architectural pack prepared by DWDS Architects submitted under separate cover of this application.

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies. RPO 4.1 states:

“In preparing Core Strategies for development Plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.”

RPO 4.2 states:

“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on

a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g., water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.”

It is submitted that the proposed development on existing zoned, serviced lands within Blackrock will adhere with the policies and objectives of the RSES for the Eastern & Midland Regional Assembly area and will contribute to providing additional housing units within the existing settlement of Dundalk, Co. Louth.

3.0 LOCAL PLANNING POLICY

This section of the report provides an account of the relevant local planning policy framework pertaining to the application site and proposed development, all of which is contained within the Louth County Council Development Plan 2021-2027 and the Dundalk Local Area Plan 2024-2030.

3.1 Louth County Council Development Plan

3.1.1 Overarching Considerations

The subject site is located within the functional area of Louth County Council. The development of the site is therefore informed by the policies and objectives of the Louth County Council Development Plan 2021-2027. The policies and objectives of the Development Plan are underpinned by the following strategic vision:

“Promote County Louth, in particular the Regional Growth Centres of Drogheda and Dundalk, as uniquely attractive places in which to live, work, visit and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are all to the highest standards, while transitioning to a low carbon and climate resilient society”

3.1.2 Core Strategy & Settlement Strategy

The purpose of the Core Strategy is to guide the spatial direction of future development and regeneration in the County in line with the principles of compact growth with a key objective to ensure that the quantum and location of development is consistent with national and regional policy.

The aim of the Louth Development Plan Core Strategy is as follows:

“The Core Strategy facilitates and promotes a more consolidated compact urban form and ensures that future growth is based on the principles of sustainable development, delivering a high-quality living and working environment meeting the needs of all residents.”

Table 2.8 of the County Development Plan describes the population at the current 2016 census and the projected population to the end of the Plan period, 2027 as follows:

Table 2.8: Population Projections for Louth 2016-2027

Population 2016	NPF Projected Population 2026	25% Headroom 2026 Projected Population Increase	Projected Population 2026 including 25% Headroom	Projected Annual Average Population Increase 2016 - 2026 excluding 25% Headroom	Projected Population 2027
128,884	139,000 – 144,500	2,529 – 3,904	141,529 – 148,404	1,562	149,966

Figure 24. County Louth Projected Population Growth 2027 extracted from the Louth County Development Plan 2021-2027

Section 2.4.5 of the County Development Plan further states that the following:

“The bulk of the projected population and household growth in County Louth is directed to the Regional Growth Centres (RGCs) of Drogheda and Dundalk (69%) in accordance with the principal objectives of the NPF, RSES and as provided for in the Settlement Hierarchy. It is consistent with reaching a population of 50,000 in each of the towns by 2031 as set out in the RSES and supports consolidated development in these large centres to facilitate economic growth and broaden the employment base.

Strengthening the role of Drogheda and Dundalk as RGCs and the Self-Sustaining Growth Towns of Ardee and Dunleer is critical to address the more recent pattern of development evident during the 2011-2016 inter-censal period where the majority of the combined population growth occurred in the lower tier towns, villages, and open countryside (Figure 2.4). Such a pattern of growth is counter-productive to the stated objectives of the NPF and the RSES and to the development of Drogheda and Dundalk as Regional Growth Centres, militating against the two towns reaching their full potential as cities of scale and economic drivers in the Region.”

Table 2.11 of the Louth County Development Plan provides a breakdown of population projections and distributions by Settlement Category. With Dundalk being described as a Regional Growth Centre, it is projected to have a population of 46,664 persons by 2027, which is an average increase of 696 additional persons per year from 2016-2027 within Dundalk.

The proposed development will direct an additional 4 no. 3-bedroom houses within the existing Cois Ferraige and wider built-up Blackrock area, helping the Development Plan to achieve its population targets set out within the Core Strategy of the County Development Plan 2021-2027. This approach accords with the policies for housing growth and spatial strategy put in place by the NPF and RSES enacted through Chapter 2 of the Development Plan and as such it is submitted that the proposal is compliant with the County Development Plan.

Regarding housing, Section 2.6 of the Louth County Development Plan 2021-2027 confirms that the plan is steadily meeting its housing requirements, with Section 2.6.2 as follows:

“A continuation of the economic recovery and improved consumer confidence is evident in the increase in housing construction in the County. The CSO Report ‘New Dwelling Completions’ 2011- 2020 illustrates a steady, continual increase in residential construction in the County since 2014 (Figure 2.5). This increased activity is set to continue having regard to the level of

pre-planning enquiries, permitted SHDs, active construction sites and extant permissions in the County.”

Figure 2.5 of the Core Strategy further confirms this, outlining the new dwellings completed within Louth, outlining a continuous progression, save for 2020 which can be accounted for by the Covid-19 pandemic.

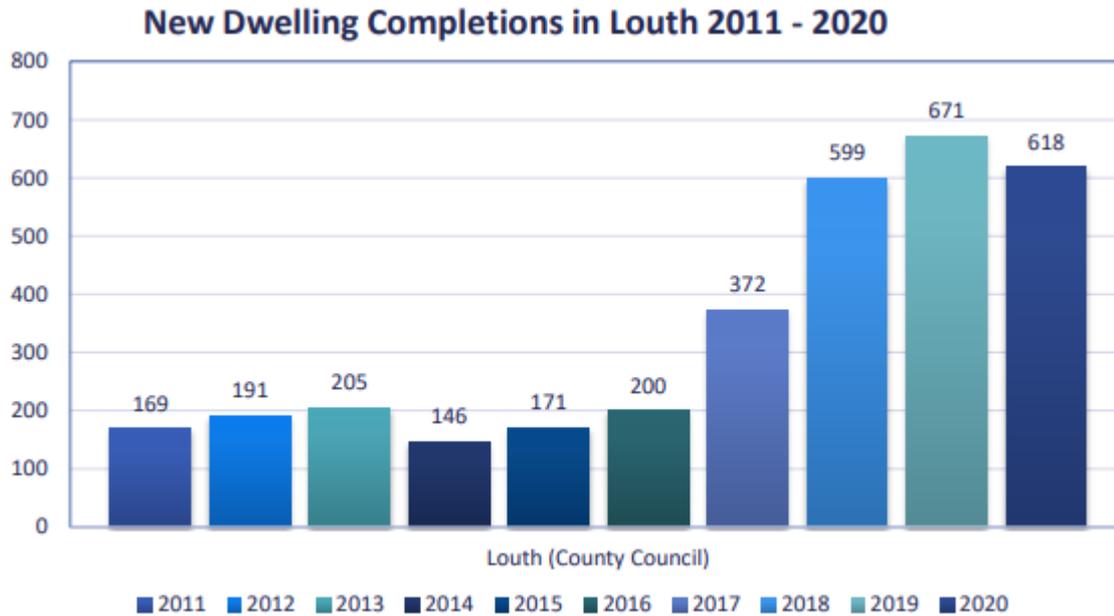


Figure 25. New Dwelling Completions in Louth extracted from the Louth County Development Plan 2021-2027

Table 2.17 of the Louth County Development Plan outlines the Core Strategy table for the County, which has been extracted in Table 16 below outlining the housing targets for County Louth and the Regional Growth Centre of Drogheda:

Table 16. Louth County Development Plan Core Strategy Specific to County Louth and Dundalk

Settlement	Population 2016	Projected Population 2017	Total Projected Housing Stock 2027	Total Additional Housing Units 2016-2027	Approximate Units Completed 2016-2020	Housing Allocation 2021-2027
Louth	128,884	149,966	61,717	10,318	2,040	8,278
Drogheda	39,004	46,664	19,892	3,541	935	2,606

The proposed development is seeking permission for an additional 4 no. houses within the existing housing estate of Cois Farrage, located in Blackrock, County Louth, to now provide a total of 158 no. housing units within the estate. DOWNEY notes that within the parent permission for this development, ABP Ref. 303253-18, a total of 166 no. housing units were proposed, with permission granted for 158 no. houses (in accordance with Condition 2 of ABP Ref. 303253-18), however 4 no. houses were removed following further archaeological surveys on site. As such it is submitted that the subject LRD application will assist the County in achieving its housing targets through the provision of these 4 no. houses on the subject site, bringing the total number of houses within Cois Farrage back up to the originally permitted 158 no. houses.

Section 2.7 (Economic Development) of the Development Plan sets out the economic development strategy for the county over the plan period. In recognition of the importance of the Dublin – Belfast Economic Corridor, the Plan promotes economic growth in those locations identified in the RSES as capable of accommodating significant economic growth, primarily the RGCs of Drogheda and Dundalk. The Plan then sets a number of Strategic Policy Objectives for the County having regard to its housing and economic strategy which are as follows:

“Policy Objective CS1: To secure the implementation of the Core Strategy and the Settlement Strategy in so far as practicable, by directing sustainable growth towards the designated settlements, subject to the availability of infrastructure and services”

The proposed development will provide 4 no. houses located at Cois Ferraige, which will provide for a completion of the total number of housing units granted within the parent permission ABP Ref. 303253-18. The subject site at Cois Ferraige is in close proximity to Dundalk Town, a designated settlement and Regional Growth Centre with large scale infrastructure and services. Therefore, it is submitted that the proposed development will deliver sustainable growth in accordance with Objective CS1.

“Policy Objective CS2: To achieve compact growth through the delivery of at least 30% of all new homes in urban areas within the existing built-up footprint of settlements, by developing infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites.”

The proposed development is located within the existing settlement boundary of Dundalk and will deliver 4 no. residential units within the existing built-up footprint of Blackrock and as such is in compliance with this Development Plan objective.

“Policy Objective CS3: To support and manage the self-sufficient sustainable development of all settlements in a planned manner, with population growth occurring in tandem with the provision of economic, physical and social infrastructure.”

The proposed development will provide for the completion of the total number of housing units previously permitted at Cois Ferraige, granted under ABP Ref. 303253-18. Within the parent permission a creche facility was granted permission and this is under construction. DOWNEY have also prepared a Community and Social Infrastructure Assessment which is available in Section 7 of Part A of this report, confirming sufficient social infrastructure within the surrounding area to cater for the proposal.

“Policy Objective CS10: Direct and consolidate the majority of the County’s future population growth into the strong and dynamic Regional Growth Centres of Drogheda and Dundalk in line with the objectives of the Regional Spatial and Economic Strategy and in accordance with the Core and Settlement Strategies of the Development Plan.”

“Policy Objective CS11: Support the Regional Growth Centres of Drogheda and Dundalk as regional economic drivers targeted to grow to city scale with a population of 50,000 by 2031 and capitalise on their strategic location on the Dublin-Belfast Economic Corridor.”

The proposed development will deliver an additional 4 no. houses within the designated settlement boundary of Dundalk, a Regional Growth Centre where the majority of population growth should be accommodated in Louth County Council. It will contribute towards meeting the population targets of the area and as such complies with these development objectives.

Section 2.14 of the Louth County Development Plan 2021-2027 sets out further policy objectives relating to Dundalk, with the following of relevance to the proposed development:

“Policy Objective SS19: To support the role of Dundalk as a Regional Growth Centre and a driver of growth along the Dublin-Belfast Economic Corridor and in the border area and to facilitate the continued expansion and growth of the town based on the principles of balanced, sustainable development that enables the creation of employment, supports economic investment, and creates an attractive living and working environment.”

The proposed development will provide for 4 no. houses at the subject site, on lands zoned appropriately for residential development, in close proximity to Dundalk Town, which will support the role of the town as a Regional Growth Centre along the Dublin-Belfast Corridor.

“Policy Objective SS25: To manage the growth of Dundalk in a manner that will achieve the creation of a compact settlement with attractive and inclusive neighbourhoods where there is a choice of affordable homes for all.”

The proposed development will see the completion of the initially permitted development of 158 no. houses at Cois Ferraige, granted under ABP Ref. 303253-18. The subject application will provide for 4 no. houses located within the built-up area and will add to the compact settlement of the area and as such is compliant with the above.

3.1.3 Housing

Chapter 3 of the Louth County Development Plan is on ‘Housing’ and has the following aim:

“To facilitate the provision of a high quality, suitable mix of adaptable, lifetime housing that meets the needs of all residents in the County; based on the principles of place making, compact growth, and healthy, sustainable communities where housing is close to services and where sustainable modes of transport can be facilitated.”

The Development Plan sets out the following objectives of relevance to the subject application:

“Policy Objective HOU1: To secure the implementation of the Louth Housing Strategy 2021-2027.”

The proposed development seeks to provide 4 no. additional housing units within the existing Cois Ferraige residential area, located on suitably zoned lands, and as such will contribute to the housing strategies of Louth County Council in achieving its targets.

“Policy Objective HOU2: To support the delivery of social housing in Louth in accordance with the Council’s Social Housing Delivery.’ Programme and Government Policy as set out in Rebuilding Ireland: Action Plan for Housing and Homelessness.”

“Policy Objective HOU3: To apply a social and affordable housing requirement, in accordance with the requirements of Part V of the Planning and Development Act 2000 (as amended).”

Following the decision to grant the parent permission of Cois Ferraige, under ABP Ref. 303253-18, the applicant has been in on-going discussions with Louth County Council to provide appropriate social housing provision in accordance with Part V of the Planning and Development Act 2000 (as amended).

“Policy Objective HOU15: To promote development that facilitates a higher, sustainable density that supports compact growth and the consolidation of urban areas, which will be appropriate to the local context and enhance the local environment in which it is located.”

The subject site is located within the existing residential area of Cois Ferraige in Blackrock and as such supports the vision of compact growth. The proposal will now provide for the completion of the 158-no. houses permitted under ABP Ref. 303253-18, through the construction of 4 no. houses at this site. The proposed development seeks to provide 4 no. 2-storey, 3-bedroom houses which is similar to that of the existing houses within the surrounding area and as such will integrate successfully to the surrounding area. It is therefore submitted that the proposed development is in accordance with the above policy objective.

“Policy Objective HOU21: To ensure that new residential developments are consistent, in so far as practicable, with the ‘Guidelines on Sustainable Residential Development in Urban Areas’ in creating attractive, sustainable, climate resilient and healthy communities.”

The proposed houses have been designed in accordance with the relevant guidelines and housing standards, including the Sustainable Residential Development Compact Settlement Guidelines for Planning Authorities 2024. Louth County Council are invited to refer to Housing Quality Assessment prepared by DWDS and submitted under separate cover of the subject application for further confirmation.

“Policy Objective HOU26: To require the provision of an appropriate mix of house types and sizes in residential developments throughout the County that would meet the needs of the population and support the creation of balanced and inclusive communities.”

The proposed development will provide 4 no. 2-storey, 3-bedroom houses which is similar to that of the existing houses within the surrounding area and similar to the permitted houses in Cois Ferraige under ABP Ref. 303253-18, providing an appropriate house type for the area.

3.1.4 Social and Community

Chapter 4 of the Louth County Development Plan is on ‘Social and Community’ and has the following aim:

“Provide and facilitate the development of healthy, sustainable, inclusive communities integrated with the timely delivery of a wide range of community, social, educational, recreational and cultural facilities where accessibility and social inclusion is provided for all, ensuring County Louth develops as a location with an enhanced quality of life for its citizens and visitors alike.”

The Development Plan sets out a number of policy objectives in respect of Social and Community, with the following of relevance:

“Policy Objective SC11: To require that all new residential development applications on lands greater than 1ha or for 100 units or more are accompanied by a Social Infrastructure Assessment to determine if community facilities in the area are sufficient to provide for all future residents. Where deficiencies are identified proposals will be required to accompany the

planning application to address the deficiency, either through direct provision on site or such other means, and in a manner acceptable to the Council.”

The subject SHD application is for an amendment application only and is seeking permission for 4 no. houses on the subject site. DOWNEY have therefore provided a Community and Social Infrastructure Audit in Section 7 of Part A of this report, which confirms that there is adequate infrastructure within the surrounding area to cater for the proposal.

“Policy Objective SC35: To support and facilitate the sustainable provision of childcare facilities in appropriate and suitable locations and seek their provision concurrent with new residential development, all having regard to the Childcare Facilities Guidelines for Planning Authorities (2001) and Childcare Regulations (2006) and any subsequent guidelines, in consultation with the Louth County Childcare Committee. Such facilities will be directed to settlements identified in the Settlement Hierarchy.”

Within the parent permission for this development, ABP Ref. 303253-18, a circa 250 sq. m. creche was proposed and permitted on site. This creche is currently under construction and is due for completion by the end of 2025. DOWNEY also notes that as set out within Section 6 of Part A of this report, there are sufficient childcare facilities within the immediate surrounding area to cater for the increase proposed as a result of the 4-no. houses proposed within this LRD application.

3.1.5 Natural Heritage, Biodiversity and Green Infrastructure

Chapter 8 of the Louth County Development Plan is on ‘Natural Heritage, Biodiversity, and Green Infrastructure’ and has the following aim:

“Protect and enhance the County’s unique heritage and biodiversity including sites designated at national and EU level, protected species and habitats outside of designated sites while recognising the potential for sustainable green infrastructure development within the County. Protection, management and enhancement of the landscape of the County is promoted to ensure the proper planning and sustainable development of the County”

The Development Plan sets out a number of policy objectives in respect of Natural Heritage, Biodiversity and Green Infrastructure, with the following of relevance:

“Policy Objective NBG2: To promote and implement the objectives of the Local Biodiversity Action Plan for County Louth 2021 - 2026 and any subsequent Louth Biodiversity Action Plan published during the life of this Plan.”

“Policy Objective NBG3: To protect and conserve Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated under the EU Habitats and Birds Directives.”

“Policy Objective NBG4: To ensure that all proposed developments comply with the requirements set out in the DECLG ‘Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities 2010’.”

“Policy Objective NBG5: To ensure that no plan, programme, or project giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land,

water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan, either individually or in combination with other plans, programmes or projects.”

“Policy Objective NBG6: *To ensure a screening for Appropriate Assessment (AA) on all plans and/or projects and/or Stage 2 Appropriate Assessment (Natura Impact Report/ Natura Impact Assessment) where appropriate, is undertaken to make a determination. European Sites located outside of the County but within 15km of the proposed development site shall be included in such screenings as should those to which there are pathways, for example, hydrological links for potential effects.”*

“Policy Objective NGB10: *To ensure that development proposals, where relevant, improve the ecological coherence of the Natura 2000 Network of European Sites and encourage the retention and management of landscape features as per Article 10 of the Habitats Directive.”*

Within the parent permission, ABP Ref. 303253-18, a Natura Impact Statement was prepared to assess the development of 166 no. houses on the entire landholding (158 no. houses permitted under ABP Ref. 303253-18). This Natura Impact Statement concluded with the following:

“Based upon the assessment outlined above and the implementation of all environmental safeguards and mitigation measures, it is concluded that the project will not have the potential to result in likely significant effects to the integrity and conservation status of European Sites occurring in the wider area surrounding the project site, either alone or in combination with other plans or projects.”

Within An Bord Pleanála’s Inspector’s Report of the parent permission, ABP Ref. 303253-18, a further assessment was conducted by the Board which concluded as follows:

“I consider it reasonable to conclude on the basis of the information on the file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of the European sites - Dundalk Bay SAC: Site Code 000455, Dundalk Bay SPA: Site Code 004026, in view of their Conservation Objectives.”

The subject amendment application is seeking permission for 4 no. houses on the subject site. Openfield Ecology have therefore prepared an updated Appropriate Assessment screening to assess the proposal, which concludes as follows:

“On the basis of the screening exercise carried out above, it can be concluded that the possibility of any significant impacts on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.”

For further information in this regard, please refer to the Appropriate Assessment Screening prepared by Openfield Ecology, submitted under separate cover of the application. It can therefore be concluded that the proposed development will not have any negative impact on any nearby Natura 2000 sites.

3.1.6 Infrastructure and Public Utilities

Chapter 10 of the Louth County Development Plan is on 'Infrastructure and Public Utilities and has the following aim:

“Support County Louth’s strategy for targeted population and strong economic growth in line with national and regional objectives through protection, improvement and extension of water services infrastructure, and flood alleviation services throughout the County, in conjunction with other statutory bodies. Encourage and support energy and communication efficiency to achieve a reasonable balance between responding to EU and national policies on climate change, renewable energy, communications and enabling resources to be harnessed in a sustainable manner in accordance with the future proper planning and development of the County.”

The Development Plan sets out a number of policy objectives in respect of Infrastructure and Public Utilities, with the following of relevance:

“Policy Objective IU6: To require all new developments connect to the public supply where public water and wastewater infrastructure is available or likely to be available and which has sufficient capacity.”

“Policy Objective IU13: IU 13 To require that all development taking place within an area served by a public wastewater treatment system connects to that system.”

The applicant has been in constant liaison with Uisce Éireann during the construction of the permitted Cois Ferraige (granted under ABP Ref. 303253-18). The applicant has received a Confirmation of Feasibility for the development on site, confirming sufficient capacity within the existing infrastructure to cater for the proposed 4 no. houses. Confirmation of this consultation has been submitted under separate cover of the subject application.

“Policy Objective IU19: To require the use of Sustainable Drainage Systems to minimise and limit the extent of hard surfacing and paving and require the use of SuDs measures be incorporated in all new development (including extensions to existing developments). All development proposals shall be accompanied by a comprehensive SuDs assessment including run-off quantity, run off quality and impacts on habitat and water quality.”

As noted above, the subject application is located on lands previously permitted for open space area under ABP Ref. 303253-18. Following further archaeological surveys, it was required that 4 no. houses had to be removed from the site and replaced with green open space. This open space has since been implemented with a 0.135ha. wildflower garden located to the immediate east of the subject site, along with various SuDS measures being implemented across the wider development area.

“Policy Objective IU26: To reduce the risk of new development being affected by possible future flooding by:

- *Avoiding development in areas at risk of flooding and*
- *Where development in floodplains cannot be avoided, taking a sequential approach to flood risk management based on avoidance, reduction and adaptation to the risk.”*

“Policy Objective IU27: To ensure all proposals for development falling within Flood Zones A or B are consistent with the “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” 2009. Proposals for development identified as being vulnerable to flooding must be supported by a site-specific Flood Risk Assessment and demonstrate to the satisfaction of the Planning Authority that the development and its infrastructure will avoid significant risks of flooding and not exacerbate flooding elsewhere.

In Flood Zone C, where the probability of flooding is low (less than 0.1%), site-specific Flood Risk Assessment may be required, and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed.”

Within the parent permission, ABP Ref 303253-18, a Site-Specific Flood Risk Assessment was conducted based on the 166 no. houses proposed (158 no. houses permitted under ABP Ref. 303253-18) which concluded that the site was not at any risk of flooding with mitigation measures proposed. Within An Bord Pleanála’s Inspector’s Report it stated:

“I am satisfied with the findings of the applicant’s flood risk assessment and agree with the measures proposed. “

As such, a further Site-Specific Flood Risk Assessment has been prepared by TOBIN Consulting Engineers to assess the proposed development of 4 no. houses at the subject site, with the following conclusion:

“Based on the results of this flood risk assessment, it is estimated that the risk of flooding to the proposed development will be minimal, and that the development will not increase the risk of flooding elsewhere, all residential properties are appropriately located in Flood Zone C.”

Louth County Council are invited to refer to the Site-Specific Flood Risk Assessment submitted under separate cover for further details in this regard.

3.1.7 Development Management Guidelines and Land Use Zoning

Chapter 13 of the County Louth Development Plan sets out Development Management Guidelines and has the following aim:

“To achieve high standards in design and to build sustainable, healthy communities where people can enjoy a high quality of life.”

The following development management standards of relevance to the subject application, are set out within the County Development Plan:

Appropriate Assessment Screening

As part of the parent permission of the subject application, ABP Ref. 303253-18, an AA Screening and NIS were submitted to accompany the proposed development. As such, in support of the subject amendment application, an updated Appropriate Assessment Screening has been prepared by Openfield Ecology to accompany the subject amendment application. Given the nature of the project and implementation of best practice construction measures particularly in relation to protection of

water quality, it is concluded that the development will not result in any significant impact on any European Sites and a full Appropriate Assessment is not required.

Louth County Council are invited to refer to the AA screening submitted under separate cover of the application, along with the AA Screening and NIS submitted with the parent permission (ABP Ref. 303253-18) for further details in this regard.

Flood Risk Assessment

Within the parent permission (ABP Ref. 303253-18), a full civil engineering pack was submitted to accompany the application, this included all relevant drainage details as well as a Flood Risk Assessment which the planning authority are invited to refer to.

The subject amendment application is seeking permission for only 4 no. houses within the subject area. As such, an updated Site-Specific Flood Risk Assessment has been prepared by TOBIN Consulting Engineers, which confirms that the site is not at any risk of flooding. The applicant has also obtained a Confirmation of Feasibility (COF) letter from Uisce Éireann which confirms that connections are feasible.

Louth County Council are invited to refer to the associated engineering drawings and reports, all submitted under separate cover, for further details in this regard.

Public Open Space

As discussed in the above sections, this LRD application has emerged after an SHD application (ABP Ref. 303253-18) was granted for development on site. This development is in the process of being implemented, with construction completed on a large number of houses (now occupied) and a large number of houses substantially complete. During the course of the construction, archaeological remains were found within an area intended to accommodate 4 no. houses. As such, these houses were not built, and a Public Open Space area was developed instead. The applicant is now seeking to re-instate these 4 no. houses in an alternative location, as per the subject LRD application. The area previously intended for the 4 no. houses is now in use as a 0.135ha. public open space area, in lieu of the area previously intended for open space.

Private Open Space

The subject application is seeking permission for 4 no. 3-bedroom houses, and as such a minimum of 40 sq. m. of private open space is required. Within the subject application, it is proposed to provide a variety of private open space, ranging from 46 to 107 sq. m. in size, and is therefore considered to comply with the required standards.

Car and Bicycle Parking

Each housing unit will be serviced by 1 no. car parking spaces each which is considered acceptable given the site's location.

Bicycle parking will be provided within the rear private garden area for each house, which is considered acceptable.

Bin Store

Bin Store for each house will also be provided within the rear private garden associated to each individual house.

Childcare

As discussed under Section 6.0 of Part A of this report above, within the parent permission of the subject site, ABP Ref. 303253-18, permission was granted for a 250 sq. m. creche to cater for the proposed development. This creche is currently under construction and is due for completion by the end of 2025 and will cater for the proposed houses within the subject amendment application.

It can therefore be concluded that the subject amendment application is in complete compliance with the relevant policies and objectives set out within the Louth County Development Plan 2021-2027, and it is therefore requested that planning permission be granted.

3.2 Dundalk Local Area Plan

The Dundalk Local Area Plan was adopted by the members at a Special Council Meeting on the 6th March 2025 and came into effect on 17th April 2025. This LAP provides a spatial framework for the future growth and development of Dundalk for the next six years and beyond. The LAP recognises the strategic importance of Dundalk through its designation as a Regional Growth Centre in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region and its location along the Dublin-Belfast Economic Corridor in the National Planning Framework (NPF). As such, the following are of key relevance to the subject amendment application.

3.2.1 Land Use Zoning

The Development Plan sets out a number of policy objectives in respect of Development Management Guideline including Land Use Zoning. As stated in the plan *“the primary purpose of land use zoning is to promote the orderly development of settlements within the County, by eliminating potential conflicts between incompatible land uses, protecting resources and to establish an efficient basis for investment in infrastructure and facilities.”* The Development Plan’s *“overall zoning strategy is based on the principles of sustainable development, social inclusion, climate action, environmental protection, compact growth of urban centres, land use/transportation planning integration and providing opportunities to enjoy a high quality of life.”*

Within the 2025-2031 Dundalk Local Area Plan, the subject site is zoned ‘A1 Existing Residential’. This zoning has the following objective:

“To protect and enhance the amenity and character of existing residential communities.”

Further guidance of this objective set out within the County Development Plan states:

“The objective for this zoning is to conserve and enhance the quality and character of established residential communities and protect their amenities. Infill developments, extensions, and the refurbishment of existing dwellings will be considered where they are appropriate to the character and pattern of development in the area and do not significantly affect the amenities of surrounding properties. The strengthening of community facilities and

local services will be facilitated subject to the design, scale and use of the building or development being appropriate for its location.”

Under the A1 Existing Residential zoning, the following uses are permitted in principle:

Generally Permitted Use

Allotments, B&B/ Guest House, Community Facility, E-Charging Facility, Home Based Economic Activities, Nursing Home, Park/Playgrounds, Place of Worship, Recreational /Amenity Open Space, Recreational /Sports Facility, **Residential**, Residential Institution, Retirement Village, Sheltered Accommodation, Traveller Accommodation, Utilities.

Open for Consideration

Coffee Shop/Tea Room, Childcare Facility, Healthcare Practitioner, Restaurant, Shop $\leq 200\text{m}^2$, Telecommunications Structures, Veterinary Surgery.

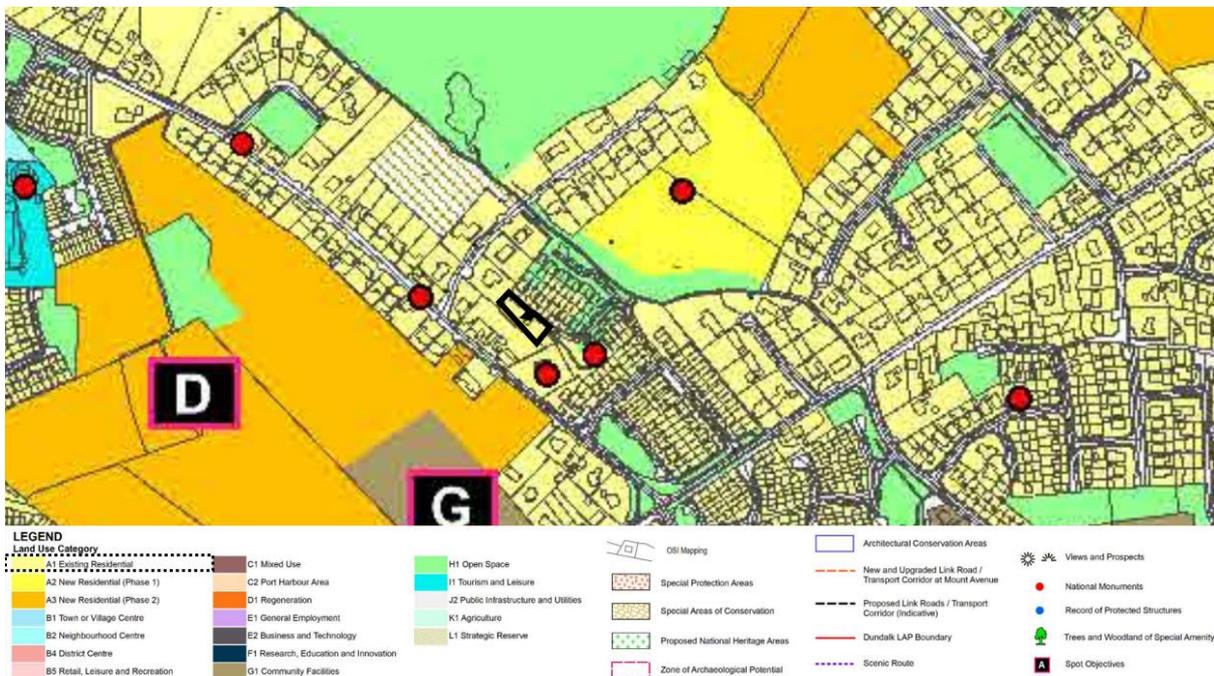


Figure 26. Land use zoning. Subject site in black outline

It is therefore considered that the subject development is considered to be consistent with the land use zoning of the subject site and should therefore be granted permission.

3.2.2 Development Strategy

The LAP notes that as per 2022 census data, Dundalk had a population of 43,112, making it the second largest town in Ireland. The LAP states that it will seek to facilitate population and economic growth in Dundalk and enable the town to compete ambitiously for jobs and investment. As part of the strategy of promoting the sustainable growth of Dundalk, The LAP places a strong emphasis on achieving compact growth and making the most efficient use of land.

Table 2.3 of the LAP sets out the projected housing allocation for Dundalk, and notes that an additional 3,671 housing units are required within the area between 2021 and 2030. Within this context, the following policies are set out with regards to the subject application:

“DS 1: To support the orderly expansion of the Regional Growth Centre of Dundalk and enable the town to strengthen its role as a regional economic driver targeted to grow to city scale.”

“DS 4: To achieve compact growth through the delivery of at least 30% of all new homes in urban areas within the existing footprint of Dundalk, by developing infill, brownfield, regeneration, and town centre sites and redeveloping under-utilised lands in preference to greenfield lands.”

“DS 5: To support and manage the self-sufficient sustainable development of Dundalk in a planned manner, with population growth occurring in tandem with the provision of economic, physical, and social infrastructure.”

Permission has previously been granted under Reg. Ref. ABP Ref. 303253-18 for a housing development which is currently under construction at Cois Ferraige. The subject amendment application is seeking permission for 4 no. houses to be located within the existing residential area of Cois Ferraige. It is therefore considered that the subject application complies with the above policies and is consistent with the overall housing objectives of the County.

3.2.1 Sustainable Neighbourhoods and Communities

Chapter 5 of the County Development Plan relates to Sustainable Neighbourhoods and Communities and sets out how the LAP will support the creation of quality neighbourhoods and communities and will set out the approach for the delivery of residential accommodation, neighbourhood, social, education, and community facilities within the area. The LAP notes that a key element of placemaking and urban design is the creation of an environment which is attractive to live, work and visit. It is considered that given the subject’s sites location and overall development, it will assist in realising the above objectives and policies of sustainable neighbourhoods, through the provision of housing, creche, and open space, all located within its strategic location within Dundalk.

This subject LRD application has emerged following a previously granted SHD application (ABP Ref. 303253-18) on the subject site. This development is in the process of being implemented, with construction completed on a large number of houses (now occupied) and a large number of houses substantially complete. During the course of the construction, archaeological remains were found within an area intended to accommodate 4 no. houses. As such, these houses were not built, and a Public Open Space area was developed instead. The applicant is now seeking to re-instate these 4 no. houses in an alternative location and it is therefore considered acceptable, as it will see the completion of the initial intention of the subject lands.

4.0 CONCLUSION

DOWNEY, Chartered Town Planners, have prepared this Planning Statement and Statement of Consistency with Planning Policy on behalf of our client and the applicant, Westdalk (ROI) Ltd., to accompany a proposed Largescale Residential Development application (LRD) on lands Old Golf Links

Road, Blackrock, Co. Louth. The proposed development subject to this LRD is for an amendment to a previously approved SHD application under Reg. Ref. ABP Ref. 303253-18. The application provides for the construction of 4 no. houses (4 no. 3-bedroom) and all associated site infrastructure and engineering works necessary to facilitate the development.

The design of the proposed scheme has been the subject of a full analysis/feasibility study of the proposed site and its surrounding landscape, and it is considered that the proposed development represents a high-quality design whilst optimising the appropriate use of the site.

The proposed development will provide for a sustainable residential development on appropriately zoned lands, in an accessible location within the development boundaries of Blackrock, Co. Louth, which would promote compact urban growth and a good quality of life. This in turn will further support compact growth of the town itself and assist in meeting the increasing demand for residential accommodation in Dundalk, Co. Louth and the overall County.

The proposed development comprises a high-quality scheme of an appropriate scale and of a sustainable residential density reflective of its locational attributes proposed within the spirit of the Louth County Development Plan 2021-2027 and in line with the national, regional, and local policy guidance. The Statement of Consistency embedded in this Statement demonstrates that the proposed development complies with the relevant planning policy and guidance in the foregoing levels. Furthermore, the proposal will provide for an effective, efficient, sustainable use of what is a greenfield site in an accessible location.

The proposed dwelling houses meet the requirements of Louth County Council and fully comply with the Louth County Development Plan 2021-2027, the *'Sustainable Residential Development and Compact Settlements'* Guidelines, and the *'Sustainable Urban Housing: Design Standards for New Apartments'* Guidelines. All house types proposed meet the minimum gross floor areas required and meet the aggregate living room, living areas, bedroom areas and storage areas required. Please refer to the accompanying drawings and Schedule of Accommodation enclosed with this planning application for a full breakdown of living standards for each unit type. The delivery of 4 no. residential dwellings at this location will add to the sense of community in the area, would represent an appropriate and sustainable land use, and would provide for an appropriate use on an otherwise underutilised site. Please also refer to the Architect Design Statement prepared by Denis Williams Design Service Architects which demonstrates the proposed development's compliance with the relevant planning policy and guidelines.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development represents a high-quality residential development. DOWNEY trust that the enclosed plans and particulars pertaining to this application are in order and look forward to a favourable decision from Louth County Council in due course.