



## Draft Dundalk Local Area Plan 2024-2030

The Eastern and Midland Regional Assembly notes the publication of the draft Dundalk Local Area Plan (LAP) 2024-2030 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly.

### 1.0 Legislative Context

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000 (as amended). It should be noted that this legislation is currently under review, with the new Planning and Development Bill 2023 approved by Cabinet on 3<sup>rd</sup> October 2023 and has completed Seanad Éireann, Third Stage (July 2024). It is anticipated that the Planning and Development Bill 2023 will be enacted into legislation in the coming months.

The Regional Assembly is not required under Section 27 of the Planning and Development Act 2000 (as amended), to prepare a submission and observation on a local area plan prepared by a local authority as is the case for a development plan, or variation thereof, however the Regional Assembly considers that regionally important and strategic plans should be commented upon by the Assembly, and in this case a plan for a designated Regional Growth Centre in the Region is considered as such. In this regard the Assembly makes this submission and the comments hereunder to be taken into consideration by the local authority in the making of the Dundalk Local Area Plan 2024-2030.

### 2.0 Regional Spatial and Economic Strategy (RSES)

The RSES for the Eastern and Midland Region, which was made by the Members of the Assembly on 28<sup>th</sup> June 2019, is a strategic plan and investment framework to shape future growth throughout the Region. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives (RPOs).

The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision is supported by sixteen Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

A primary statutory objective of the Regional Spatial and Economic Strategy (RSES) is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in services and infrastructure. The RSES is of critical

importance for the delivery of Project Ireland 2040, given that it is the succeeding tier of policy delivery in Ireland.

The RSES for the Eastern and Midland Region presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; identifying Regional Growth Centres which act as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places. The RSES identifies Regional Growth Centres and Key Towns within the Region, however Self-Sustaining Growth Towns, Self-Sustaining Towns and Rural areas are to be defined by Development Plans.

Dundalk is identified as a Regional Growth Centre in the RSES growth strategy, being located in the Gateway Region and on the Dublin-Belfast Economic Corridor. The RSES outlines how the Regional Growth Centres, Athlone, Dundalk and Drogheda drive effective regional development through significant population and economic growth. Regional Growth Centres serve as important self-sustaining centres, capitalising on their strategic location and high-quality connections to Dublin. The RSES states that Dundalk in particular, due to its proximity to Newry, provides for enhanced cross-border interactions which, if promoted, can help to realise the growth potential of Drogheda-Dundalk-Newry as an important cross-border network for regional development.

The key priorities for Dundalk are to promote the continued sustainable and compact growth of the town as a regional driver of city scale with a target population of 50,000 by 2031. The objective is to provide for the regeneration of the town centre and the compact and planned co-ordinated development of the town's hinterland, along with enhancing Dundalk's role as a strategic employment centre on the Dublin-Belfast Economic Corridor. The dynamic to capitalise on its location, driving the linkage between Dundalk and Newry and strengthening cross border synergy in services and functions is promoted within the RSES.

### **3.0 Submission**

At the outset, the Assembly would like to acknowledge the extensive work that Louth County Council has carried out in order to prepare the draft Dundalk Local Area Plan (LAP) and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

The draft LAP outlines the strategic policy framework that highlights how the plan will be informed by a hierarchy of planning guidance, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region and the Louth County

Development Plan 2021-2027, as varied (CDP). The structure and content of the draft LAP constitutes the following headings:

1. Introduction
2. Development Strategy
3. Key Development and Character Areas
4. Climate Action
5. Sustainable Neighbourhoods and Communities
6. Economy and Employment
7. Retail Strategy and Tourism
8. Movement
9. Infrastructure
10. Cultural and Heritage
11. Implementation and Monitoring

The Assembly considers that these areas of focus satisfactorily align with the three key principles of the RSES (Healthy Placemaking, Climate Action and Economic Opportunity) and the sixteen Regional Strategic Outcomes (RSOs), which are outlined in Section 2.3 of the RSES.

### 3.1 Introduction

Chapter 1 of the draft LAP provides an introduction to the plan preparation process indicating that the proposed new plan will act as the key statutory planning document which sets out an overarching strategy to guide and manage the proper planning and sustainable development of Dundalk over the lifetime of the plan.

Section 1.9 of the draft LAP sets out the vision for Dundalk including the vision statement;

*“To support and grow the Regional Growth Centre of Dundalk as a uniquely attractive and inclusive place to live, work, visit, invest and do business and which capitalises on its strategic location along the Dublin-Belfast Economic Corridor, provides a strong economy, and access to quality, affordable housing, educational, health, social and community services for current and future residents, enhances and protects the natural and built environment while transitioning to a low carbon and climate resilient society through compact growth and sustainable mobility”.*

The draft LAP states that the above vision for Dundalk will be achieved through the realisation of the following strategic objectives as set out in Section 1.9.1 of the Plan;

SO 1 *‘To promote the development and growth of Dundalk as a Regional Growth Centre along the Belfast-Dublin Economic Corridor through sustainable economic development including increased and competitive enterprise and employment opportunities.’*

*SO 2 'To achieve sustainable growth and consolidation of the existing built environment of Dundalk through the delivery of the principles of compact growth, infill and brownfield development, the delivery of a suitable mix of quality housing in appropriate locations, the creation of neighbourhoods where there is a sense of place and where housing is supported by the requisite physical and community infrastructure.'*

The Assembly welcomes the inclusion of these strategic objectives in the draft Plan which are considered to support RPO's 4.20 and 4.21 in the RSES which aim to promote the growth of Dundalk including cross border interactions at a regional level and as a strategic employment centre on the Dublin-Belfast Economic Corridor.

In relation to population and housing trends in Dundalk, this chapter also provides a summary analysis of CSO census data between 2016 and 2022. It is noted that the town has a significant population growth rate of 10.5% in the 6-year period (an increase from 4,108 persons from 2016 to 2022). Furthermore, the town has a relatively young population with 28% below 20 years of age, compared to 26% elsewhere in the State.

Policy DM 2 of the draft LAP sets out how the plan will comply with the requirements for Dundalk in the Louth County Development Plan 2021-2027 (CDP) with the housing allocations contained therein previously assessed by the Regional Assembly as being compliant with the RSES 2019-2031 subject to addressing recommendations and observations made by the Assembly during the development plan preparation stage.

The draft LAP is informed by a number of data-based documents, along with an organised neighbourhood walk for stakeholders and a community mapping workshop, both in collaboration with UCD, the OPR, and the EPA, to incorporate both "top down" and "bottom-up" approaches to identifying development priorities.

The Assembly considers the overall plan preparation to be comprehensive, with the structure and content being in accordance with Local Area Plan Guidelines for Planning Authorities 2013.

### **3.2 Development Strategy**

Chapter 2 of the draft LAP sets out the Development Strategy for the draft Plan including how the draft LAP aligns with national, regional, and local planning policy. In Section 2.2, the draft LAP references the National Planning Framework (NPF) which includes a series of National Policy Objectives (NPOs) with the ones most relevant to the draft LAP relating to the promotion of compact growth; the creation of attractive, liveable, well designed and integrated urban places; along with supporting the development of the circular and bio economy.

It should be noted that along with Drogheda and Athlone, the RSES identifies Dundalk as a Regional Growth Centre in the Region. These towns, located outside the Dublin Metropolitan Area are, in

addition to Dublin, critical to the implementation of effective regional development as set out in the RSES. They will accommodate significant new investment in housing, transport and employment generating activity. They are important self-sustaining centres that act as economic drivers for the Region, capitalising on their strategic location and high-quality connections to Dublin, while also servicing and supporting a wider local economy, which extends beyond the Region in the case of Athlone and cross border in the case of Dundalk.

In support of the above, the Assembly welcomes the inclusion of Policy DS 1 in the draft LAP that supports the orderly expansion of the Regional Growth Centre of Dundalk and to enable the town to strengthen its role as a regional economic driver targeted to grow to city scale.

The Core Strategy table of the Louth CDP 2021-2027 provides for a new housing unit allocation of 2,447 units for Dundalk over the lifetime of the CDP up to 2027, to allow for a total population target of 46,664 persons. This allocation for Dundalk (being a designated Regional Growth Centre) was previously considered acceptable to the Regional Assembly as part of their submission to the draft Louth County Development Plan 2021-2027.

The draft LAP closely aligns with the housing projections of the Louth CDP 2021-2027 and the Settlement Strategy for Dundalk in the RSES which envisages a population of 50,000 for Dundalk by 2031. These figures result in an annual housing allocation of 408 between 2021 and 2027.

The draft LAP also states that CSO housing completion data indicates that just under 300 housing units were completed per annum (2021-2023) with a number of extant permissions.

The draft LAP has identified c.422 hectares of undeveloped land for economic investment and employment generating development and key to the delivery of compact growth for Dundalk is the continued rejuvenation of the town centre.

The RSES outlines that Dundalk has been identified as one of the fastest growing towns in the Country in the most recent inter-census period and lies within the Dublin – Belfast Economic Corridor. The Corridor links the cities of Dublin and Belfast and the large towns of Drogheda, Dundalk and Newry on the island by high-capacity road and national rail links, playing a critical role in supporting economic growth and competitiveness.

The RSES highlights the following growth enablers for the Dublin – Belfast Economic Corridor:

- Compact and focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale.
- Drive in the linkage between Dundalk and Newry to strengthen a cross-border synergy in services and functions.
- Improve accessibility and service by rail, road and communication between Dublin and Belfast.

In support of the above, it is noted that Policy DS 1 aims to support the orderly expansion of Dundalk and enable it to strengthen its role as regional economic driver targeted to grow to city scale, along with Policy DS 3 aiming to capitalise on the strategic location of Dundalk along the Dublin-Belfast Economic Corridor. The Regional Assembly welcomes the addition of these policies which are considered in alignment with RPO 4.20 of the RSES.

### 3.3 Key Development and Character Areas

Chapter 3 of the draft LAP identifies and provides commentary on the key development areas in Dundalk that have the potential to deliver large scale residential, mixed use and commercial development. These are outlined as 'Key Development Areas' consisting of infill, brownfield and greenfield lands in the urban core and edge of centre.

RPO 4.19 of the RSES requires that a statutory Urban Area Plan (UAP) for the Regional Growth Centre of Dundalk shall be prepared and the UAP will facilitate the development of Dundalk as an attractive, vibrant and highly accessible Regional Centre and economic driver. The preparation of the draft Dundalk LAP 2024-2030 aligns with this requirement.

The RSES supports the redevelopment of key town centre infill/brownfield sites including enhancing the accessibility and sustainable mobility within the town centre, through the promotion of Seatown/Port Harbour Area for regeneration and repurpose of a water based urban quarter, and the facilitation of urban expansion through the development of the Mount Avenue masterplan lands and other lands. Further areas identified for regeneration and redevelopment in the RSES include the Long Walk area and St. Nicholas' Quarter.

In support of RPO 4.19 of the RSES, the draft Dundalk LAP includes Policy KDCA 1 which promotes the development of 'Key Development Areas' in Dundalk including: Mount Avenue Area, Raynoldstown Village, St. Nicholas Quarter, The Long Walk Quarter, Park Street/Francis Street and St. Patrick's Church, and Dundalk Port.

To facilitate this redevelopment, Policy KDCA 2 supports the implementation of any masterplans, urban design frameworks/statements, or public realm schemes prepared for lands within the Plan area.

In terms of on-going works and plan preparation, the draft LAP highlights that Phase 1 of the St. Nicholas Quarter Project on the rejuvenation of the streetscape is due to commence on site in Q3 of 2024. The Local Infrastructure Housing Activation Funded (LIHAF) project on Mount Avenue is ongoing and due for completion in Q4 of 2024. A Masterplan for Mount Avenue is awaiting preparation.

The Assembly welcomes the various initiatives outlined in the draft LAP in relation to town centre regeneration of underutilised sites in the Dundalk which are considered supportive of the regeneration areas identified for the town as contained in Chapter 4 of the RSES.

### 3.4 Climate Action

Chapter 4 provides commentary on how the draft LAP will align with national and local level climate action plans and strategies. Section 4.4 of the draft Plan provides a summary of the Louth Climate Action Plan 2024-2029 which includes a total of 79 actions county wide identified which will accelerate local climate action with the ambition of achieving the national climate neutrality objective.

As part of the Louth Climate Action Plan, Dundalk and Blackrock have been identified and established as a Decarbonisation Zone in County Louth. The extent of the Decarbonisation Zone matches the settlement boundary of Dundalk as set out in the draft LAP.

The draft LAP will also continue to support and promote climate mitigation and adaptation measures with compact growth principles and sustainable transport principles that underpin the Plan assisting in the transition to a low carbon and climate resilient settlement.

The draft LAP also supports the transition away from reliance on fossil fuels and will promote the movement towards renewable and low energy technologies such as wind and solar energy, heat pumps, bio energy, district heating and hydro energy.

In relation to climate mitigation, given Dundalk's coastal location, the implementation of flood mitigation measures are indicated to be of paramount importance. The Office of Public Works (OPW) and Louth County Council are currently progressing the Dundalk/Blackrock Flood Relief Scheme in this respect.

Section 4.5.7 of the draft LAP also indicates how Green Infrastructure and Nature Based Solutions will be provided for and supported in Dundalk during the Plan period.

The Assembly welcomes the above, which are considered to align with the climate action Regional Strategic Outcomes (RSOs) 6, 9, 10 and 11 of the RSES which are concerned with integrated transport and land use (RSO 6), supporting the transition to low carbon and clean energy (RSO 9), enhanced green infrastructure (RSO 10), and biodiversity and natural heritage (RSO 11). The Assembly also welcomes policy supporting urban regeneration and compact growth in the town centre which can also have a positive role in addressing the challenge of climate change. This in effect supports RSO 2 in the RSES in relation to compact growth and urban regeneration and RPO's 3.2 and 3.3 relating to compact growth delivery.

In relation to climate change policy as set out in Chapter 4 of the draft LAP, the Assembly considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect the Assembly would like to draw attention to Figure 7.4 Climate Strategy of the RSES which should be referred to in the draft LAP.

The Assembly also welcomes the Council's policy approach to flood and water resource resilience and natural flood risk mitigation through the use of Green Infrastructure and nature-based solutions. It is noted that this could be further strengthened by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES, and also the Guiding Principles for Sustainable Drainage Systems as set out in Section 10.2 of the RSES.

### 3.5 Sustainable Neighbourhoods and Communities

Chapter 5 of the draft LAP provides a summary of the historic development pattern in Dundalk and its urban structure and character. It notes that Dundalk is the county town and administrative centre of County Louth with a broad range of public services available. The draft LAP makes reference to strong evidence of the consolidation of the urban core of Dundalk in recent years with a number of projects recently completed, ongoing or having received permission. It is stated that the draft LAP will continue to promote the development of infill and brownfield sites to promote compact growth. The Settlement Capacity Audit included in Appendix 1 of the draft LAP includes a map of the larger infill and brownfield sites in the Plan area.

Section 5.4 of the draft LAP provides commentary on urban design and placemaking principles that will underpin future development in the town in order to create an environment that is attractive to live, work and visit. Figure 5.2 has been included in the draft LAP to outline the key principles of quality urban design that should be an integral part of future development proposals. These are supported by the following policy objectives in the draft Plan;

*SC 2 'To promote and facilitate the creation of a sustainable community in Dundalk in a high-quality built environment where there is a distinctive sense of place with attractive streets, spaces, and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise.'*

*SC 3 'To develop and support sustainable neighbourhoods and residential developments in Dundalk that facilitate the provision of the required neighbourhood infrastructure such as schools, recreational amenities, community facilities, healthcare and childcare facilities and a suitable mix of housing at an appropriate density in accordance with the 'Sustainable Residential Development and Compact Settlements Guidelines' (DHLGH, 2024).'*

This chapter also reconfirms the commitment to compact growth principles, whereby the draft Plan will support the creation of a more compact settlement and seeks to deliver at least 30% of all new homes within the existing built-up area of the town, as stated in policy objective SC 5 *'To achieve compact growth in Dundalk through the delivery of at least 30% of all new homes within the existing built-up footprint of the town, by supporting the development of infill, brownfield, underutilised, and regeneration sites.'*

Section 5.8 of the draft LAP and Policy Objective SC 8 outlines a desire to promote the 10-minute neighbourhood concept whereby people should be able to meet most of their needs within a short walking or cycling distance of their homes. The concept is achieved through integrated land use and transportation planning, and if implemented, would assist in the creation of a sustainable community and reduce dependence on the private car. The Local Transport Plan for Dundalk (included in Appendix 2 of the draft LAP) provides more detail on the achievement of the 10-minute neighbourhood concept in the town.

The Assembly commends the above promotion of the integration land use and transportation principles as a core aim of the draft LAP which is considered to support RSO 6 in the RSES that promotes Integrated Transport and Land Use, in addition to supporting the 'Guiding Principles' for

creation of healthy and attractive place as set out in Section 9.4 of the RSES. It is however considered that this chapter of the draft LAP could be further strengthened by making reference to the Healthy Placemaking Strategy (Figure 9.2) of the RSES to underpin the above ambitions of the draft LAP.

Section 5.18.1 of the draft LAP also provides analysis for the primary and post primary school needs in Dundalk. The draft LAP includes provision for an additional two primary schools and one post-primary school. The potential locations for the proposed schools are set out in Table 5.4 of the draft LAP. It is stated that Louth County Council continues to engage with the Department of Education in a partnership arrangement on meeting the educational and facilities needs of the town via proactive identification and acquisition of school sites in addition to ensuring such facilities are as accessible as possible and that the requisite walking, cycling and public transport infrastructure is in place to encourage people to travel to school by sustainable modes of transport.

The Assembly welcomes the analysis and level of engagement with the Department of Education highlighted in the draft LAP on the provision of existing and future educational needs for students (primary and post primary) in Dundalk. It is considered that this approach supports RPO 9.21 in the RSES in relation to the assessment of need regarding school provision in collaboration with the Department of Education and Skills.

### **3.6 Economy and Employment**

The economic development strategy for Dundalk is contained in Chapter 6 of the draft LAP and includes the strategic aims *'To support the development of Dundalk as an attractive, vibrant, and accessible Regional Growth Centre and driver of economic growth for the wider region'*.

The draft LAP recognises the important role of Dundalk Institute of Technology (DkIT) as a centre of excellence for education, innovation and research and acknowledges that DkIT is currently pursuing a trajectory to achieve technological university status. Policy objective EE 2 is concerned with promoting and facilitating collaboration between businesses and DkIT that will encourage research and development and provide further education and training opportunities. This aligns with RPO 4.22 of the RSES in supporting the role of DkIT as a centre of excellence for education.

As stated under Section 3.1, the Assembly welcomes the draft LAP recognising Dundalk as a strategic employment centre on the Dublin-Belfast Economic Corridor and the Drogheda-Dundalk-Newry cross border network, which aligns with RPOs 4.20 and 4.21 of the RSES. In addition, policy objectives EE 4 – EE 8 align with RPO 4.21 in relation to the identification of suitable sites for industry including Foreign Direct Investment (FDI).

According to the draft LAP, Dundalk Port is an important economic asset to the town even though it is acknowledged that commercial activity at the port has decreased in recent years and ownership of the port is envisaged to transfer to Council ownership in the near future. RPO 4.23 of the RSES seeks to enhance the potential for economic development and regeneration at Dundalk Port/ Harbour area subject to a feasibility study and appropriate coastal zone management and the Assembly welcomes the inclusion of policy objective EE 9 of the draft LAP supporting the economic development and regeneration at Dundalk Port. It is considered that this objective could be further strengthened by referring to the requirements in RPO 4.23 in the RSES that seeks to enhance the potential for economic

development and regeneration at Dundalk Port/Harbour area subject to a feasibility study and appropriate coastal zone management.

### 3.7 Retail and Tourism

Chapter 7 of the draft LAP relates to retail and tourism in Dundalk. The draft LAP acknowledges that both retail and tourism represent two of the major economic drivers with the local and regional economy accounting for significant employment levels in the town. The Assembly welcomes the inclusion of a retail strategy contained in Chapter 7 of the draft LAP which identifies Dundalk as a Level 2 Major Town Centre & County (Principal) Town Centre in accordance with Table 6.1 of the RSES (Retail Hierarchy for the Region). The Retail Strategy identifies the core retail area and opportunity sites within Dundalk as contained in Map 7.1 of the draft LAP. The preparation of a retail strategy for the town is considered in compliance with the RSES which requires the preparation of same to provide for the sustainable retail development in Dundalk and its hinterland.

In relation to tourism, the draft LAP outlines the tourism offerings in Dundalk, including its location within the 'Ireland's Ancient East' Discover Ireland branding campaign. The draft LAP acknowledges the opportunities for tourism to grow in Dundalk being a medieval town located on the banks of the Castletown River, at the foot of the Cooley Mountains and 'The Gap of the North'. The draft LAP states that it will support and promote tourism in Dundalk through maximising assets, facilitating improvements to the public realm and the provision of additional accommodation and visitor facilities.

These are supported by policy objectives;

*RT 13 'To support Dundalk's tourist potential, in particular, its cultural heritage tourism and promote uses which activate and enhance the existing historic environment, including buildings, public realm, industrial and maritime heritage.'*

*RT 14: 'To support the implementation of the Fáilte Ireland 'Ancient Destination Experience Development Plan', specifically with regard to objectives which pertain to tourism initiatives in Dundalk.'*

The Assembly welcomes the focus on growing the tourism opportunities that arise in Dundalk over the plan period and growing its local economy. It is considered that the objectives support RPO 6.8 in the RSES that aims to support the sustainable development of tourism in the Region in line with the strategic objectives of both Ireland's Ancient East and Ireland's Hidden Heartlands experience brand propositions.

### 3.8 Movement

The RSES aims for Dundalk to enhance accessibility and sustainable mobility within the town centre by improving links between the core and surrounding areas through the further integration of public transport, walking and cycling facilities.

The Assembly welcomes the inclusion of a Local Transport Plan in Appendix 2 of the draft LAP which underpins the spatial strategy for the town on sustainable development principles. The Local Transport Plan highlights the high reliance of private car use as a means of travel in Dundalk and its

environs and includes a list of ‘Priority Actions’. The preparation of a Local Transport Plan for Dundalk also aligns with Section 8.3 of the RSES, and RPO 8.6 of the RSES.

Under Policy Objective MOV 4, the draft LAP aims *‘to encourage a modal shift from use of the private car towards more sustainable modes of transport including walking, cycling, and public transport and to support any initiatives that would assist in the attainment of any national targets relating to modal change published during the lifetime of this Plan’*.

Furthering this overarching policy objective, the draft LAP also includes Policy Objective MOV 7 that supports the progression and implementation of the active travel projects for walking and cycling within the town.

The Assembly welcomes this promotion within the draft LAP of active travel as well as the inclusion of Policy Objectives MOV 13 and MOV 14 of the draft LAP supporting the development of greenways and the mechanisms to achieve them as well as the identification of greenway improvements such as: Castletown River, Dundalk Bay to Carlingford, Louth Coastal Way – Dundalk to Blackrock, and Dundalk to Sligo Greenway. The Assembly considers that such initiatives support some of the key growth enablers for the Region as set out in Section 3.2 of the RSES. The initiatives also support RPOs 7.24 and 7.25 in the RSES in relation to greenway development across the Region.

### 3.9 Infrastructure

Chapter 9 of the draft LAP relates to infrastructure and outlines how the ‘provision of high-quality infrastructure and environmental services is pivotal to enabling growth, securing investment, creating sustainable, attractive and safe places, safeguarding community health and wellbeing, and protecting the environment’.

RPO 10.3 of the RSES requires the Regional Assembly and Local Authorities to liaise and cooperate with Uisce Éireann to ensure the delivery of Uisce Éireann’s Investments and other relevant investment works programme of Uisce Éireann that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and local authority core strategies and provide for long term solutions for wastewater treatment for the Region.

The draft LAP highlights Uisce Éireann’s 2025-2029 Capital Investment Plan under preparation with ongoing and future investment proposals for Dundalk that along with the Castletown Water Network Upgrade works aim to enable secure safe, reliable and sustainable drinking water supplies in Dundalk for the next 25 years, enabling economic and population growth.

According to the draft LAP, capacity issues have been identified in the existing wastewater network. The Dundalk-Blackrock Strategic Drainage Study will set out solutions for these capacity issues. The Assembly welcomes Policy Objective INF 1 of the draft LAP which aims *‘to liaise and work in partnership with Uisce Éireann in identifying, prioritising and progressing the implementation of water and wastewater projects and policies over the lifetime of this Plan that will enable Dundalk to achieve the projected population target and housing allocation’*.

In addition, the Assembly notes the preparation of a Strategic Flood Risk Assessment (SFRA) in line with RPO 7.12 of the RSES to support the preparation of the draft LAP.

Section 9.6.1 of the draft LAP states that Louth County Council and the Office of Public Works (OPW) are advancing the Dundalk and Blackrock Flood Relief Scheme. Policy Objectives INF 17 and INF 18 of the draft LAP supports the progression of this scheme and working alongside the OPW while Policy Objectives INF 20 and INF 21 of the draft LAP encourage the taking of opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.

The Assembly also notes and welcomes the inclusion of Policy Objective INF 6 in the draft LAP in relation to the promotion of the sustainable use of water and water conservation in existing and new developments within Dundalk. It is considered that this policy aligns with Table 10.1 (Strategic Water Services Projects) of the RSES and also RPO 10.4 that aims to support Uisce Éireann and the relevant local authorities in the Region to reduce leakage and minimising demand for capital investment.

### **3.10 Culture and Heritage**

Chapter 10 of the draft LAP outlines the culture and heritage assets in Dundalk under the three themes of natural heritage, green infrastructure and built heritage.

It is noted that the Natura 2000 network is outlined in the draft LAP with Map 10.1 identifying the Dundalk Special Area of Conservation (SAC), and Map 10.2 identifying the 'Dundalk Bay SPA' as a Special Protection Area. Policy Objectives CH 1 and CH 2 of the draft LAP underpin the commitment to protect and conserve the SAC and SPA European sites in the Plan area.

Section 9.7 of the RSES identifies the importance of cultural, architectural, and archaeological heritage within the Region, particularly in contributing to a town's identity, and the repair and reuse of historic buildings is identified as an integral part of sustainable development. This is supported by Policy Objectives CH 20 and CH 21 of the draft LAP aligning with RPO 9.30 of the RSES which is concerned with supporting the sensitive reuse of Protected Structures.

Section 10.11 of the draft LAP provides a Green Infrastructure Strategy for the town, with the various green infrastructure features and potential for enhancement listed on Table 10.7 of the draft LAP. This is further supported by Policy Objectives CH 15 and CH 16 in the draft LAP in relation to the protection and enhancement of Dundalk's Green Infrastructure network.

The Assembly welcomes the focus on Green Infrastructure set out in Chapter 10 of the draft LAP and supporting policies for same. It is however considered that this section of the draft Plan could be further strengthened by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

### **3.11 Implementation and Monitoring**

The Assembly notes the inclusion of a separate chapter dealing with the implementation of the draft LAP objectives including the statement that Louth County Council is committed to the provision of an effective monitoring and evaluation system.

The draft LAP states that monitoring procedures are being developed in line with the Louth County Development Plan. The Local Authority's Planning Department will be the lead section for the implementation and monitoring of this plan, primarily through the application of the development management process. The Plan will be used by each directorate to guide decision making and investment throughout the Dundalk area.

The Assembly welcomes the commitment given in Chapter 11 that Louth County Council will put in place an effective monitoring system to ensure that progress on key objectives in the Plan are evaluated.

### **3.12 SEA, AA and SFRA**

The Assembly welcomes the preparation of the draft LAP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The SEA Environmental Report sets out an assessment of the environmental effects in combination with the wider planning framework arising from the draft LAP to provide a clear understanding of the likely environmental consequences of decisions arising from the LAP.

Regarding mitigation, the draft LAP states that the SEA Environmental Report published as part of the plan provides a clear understanding of the likely consequences to the environment of decisions regarding the location of development in the plan area.

The draft LAP was also subject to Appropriate Assessment (AA), and a Natura Impact Report (NIR) has been prepared as an accompanying document to the overall draft LAP.

The NIR concludes that mitigation measures are necessary to avoid adverse effects on 3 (no.) European sites. However, according to the NIR, 'The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European site identified have been addressed by the inclusion of mitigation measures into the draft Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential significant effects where these cannot be avoided'.

Finally, a Strategic Flood Risk Assessment (SFRA) has been undertaken, which aligns with RPO 7.12 of the RSES, alongside the preparation of the draft LAP, the SEA and the NIR. The recommendations from the SFRA have been integrated into the draft LAP which is welcomed. In keeping with best practice, it is recommended that the local authority take opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.

## 4.0 Recommendations

The Regional Assembly would like to acknowledge the extensive work that Louth County Council has carried out in order to prepare the draft Dundalk Local Area Plan and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES which is welcomed.

The Regional Assembly advises that Louth County Council pay particular attention to the following issues in the preparation of the Dundalk Local Area Plan 2024-2030 in order to ensure consistency with the RSES, and makes the following recommendations:

### Climate Action

- Chapter 4 of the draft LAP could be enhanced by referring to Figure 7.4 Climate Strategy of the RSES.  
Reason: In the interest of demonstrating consistency with the RSES.
- Chapter 5, Section 5.8 of the draft LAP (10-Minute Neighbourhood Concept) could be strengthened further by making reference to the Healthy Placemaking Strategy (Figure 9.2) of the RSES to underpin the ambitions of the draft Plan on integrated land use and transportation in the creation of healthy and attractive places.  
Reason: In the interest of demonstrating consistency with the RSES.
- The draft LAP should align with RPOs 7.14 and 7.15 of the RSES regarding flood risk management.  
Reason: In the interest of demonstrating consistency with the RSES.

### Economic Development

- Chapter 6 of the draft LAP could be enhanced by making reference to Figure 6.3 Economic Strategy of the RSES which has the five key principles including Smart Specialisation, Clustering, Orderly Growth, Placemaking and Future Proof and Risk Management.  
Reason: In the interest of demonstrating consistency with the RSES.
- The text of objective EE 9 in Chapter 6 of the draft LAP should be amended and strengthened as follows:  
*'To support the economic development and regeneration of Dundalk Port as a strategic piece of infrastructure for delivery in Dundalk in accordance with Regional Policy Objective 4.23 of the Regional Spatial and Economic Strategy 2019-2031 for the Eastern and Midland Region.'*  
Reason: To ensure alignment with RPO 4.23 of the RSES.

### Infrastructure

- Chapter 9 of the draft LAP could be further strengthened by making reference to the guiding principles for Sustainable Drainage Systems as set out in Section 10.2 of the RSES.

Reason: In the interest of demonstrating consistency with the RSES.

### Culture and Heritage

- Chapter 10 of the draft LAP could be further strengthened by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

Reason: In the interest of demonstrating consistency with the RSES.

## 5.0 Conclusion

It is considered that the draft Dundalk Local Area Plan 2024-2030 is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031 and would be further enhanced by addressing the recommendations set out above.

It should be noted that the officials of the Eastern and Midland Regional Assembly are available to discuss the matters raised and the Assembly welcomes further opportunities to engage in the statutory process of the making of the draft Dundalk Local Area Plan.

Regards,



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Clare Bannon  
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Eastern and Midland Regional Assembly  
5<sup>th</sup> September 2024