

Eastern & Midland Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Main Street,
Ballymun,
Dublin, D09 C8P5

22 January 2018

Re: Submission on Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Dear Sir/Madam,

This submission is made on behalf of Kingsbridge Consultancy Ltd., Block 1, Quayside Business Park, Mill Street, Dundalk in response to the Assembly's request for submissions on the Draft Regional Spatial and Economic Strategy (draft RSES). Kingsbridge Consultancy Ltd. control an 18 ha site in Dundalk. The site is zoned and serviced and is currently the subject of Consultation with An Bord Pleanála under the Strategic Housing Development provisions.

The draft RSES designates Dundalk as a Regional Growth Centre, and directs significant population and economic growth towards the town for it to grow to City scale. Regional Policy Objective RPO 4.15 requires the preparation of an Urban Area Plan (UAP) for Dundalk to guide development for a target population of 50,000, and to achieve a minimum 30% compact growth.

For Dundalk to succeed in achieving sustainable growth it is imperative that the preparation of the UAP is informed by the active land management principles set out in the National Planning Framework (NPF), the draft RSES, and national policy. The NPF states that proactive land management requires prioritisation of Tier 1 'Serviced Zoned Lands' that have reasonable certainty of delivering development, acknowledging that *"the zoning of land and planning permission alone, do not necessarily guarantee delivery and population growth in accordance with projected, targeted timeframes"*.

Regional Policy Objective RPO 4.15 in the draft RSES identifies seven potentially suitable locations for urban consolidation and expansion to be considered in the preparation of the Dundalk UAP. All but one of the areas are located in the core area which will accommodate a minimum of 30% of the planned growth. The Mount Avenue masterplan lands are the only area identified for urban expansion outside the established urban footprint. Given the lead times associated with the delivery of units on brownfield sites and constrained areas, it is appropriate that the RSES and the UAP for Dundalk include additional potential development lands. To deliver the scale of growth required to meet national and regional objectives and to enable the application of active land management principles, it is proposed that RPO4.15 is amended to include reference to unconstrained Tier 1 serviced and serviceable residential lands in Dundalk, including the Blackrock Road site.

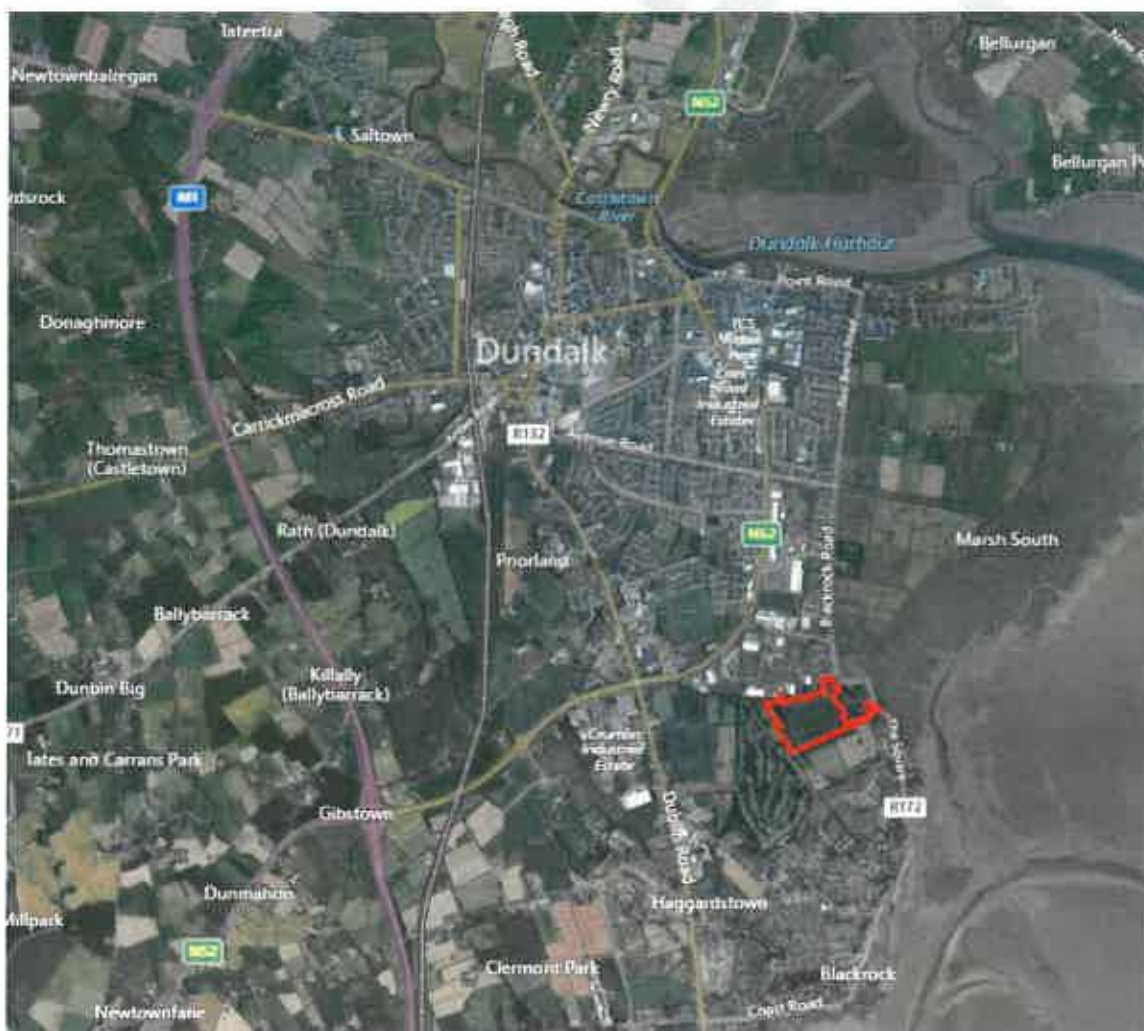
In this regard, this submission proposes that RPO4.15 is amended to include the following reference in bold:

- *Facilitate Urban Expansion through development of the Mount Avenue masterplan lands, and the **Blackrock Road site***

This proposed amendment is supported by the following planning and sustainable development considerations:

1. The site accords with the definition of Tier 1 'Serviced Zoned Lands', and can connect to existing service and transportation infrastructure.
2. The lands support the coherent and sequential development of Dundalk, being contiguous to the defined urban core, established employment and education zones, and is strategically located in relation to the emerging polycentric hubs in the wider Dundalk urban area.
3. An analysis of regeneration and urban expansion sites identified in the draft RSES establishes that additional unconstrained lands will be required to deliver development in the short term, to meet national and regional growth and sustainable development objectives.

Figure 1. Location of Kingsbridge Consultancy lands in Blackrock, Dundalk (Source: Bing Maps)



1.0 Planning Status of the Blackrock Lands

Both the National Planning Framework and the draft RSES support a standardised methodology for coordinating land use zoning and essential services, to ensure deliverability of growth in accordance with core strategies.

The National Planning Framework (NPF) provides a two-tier methodology for designating land for development within the lifetime of statutory land use plans. National Policy Objective 72a states that for the purposes land use zoning, planning authorities will differentiate between: i) zoned land that is serviced, and ii) zoned land that is serviceable within the life of the plan. Tier 1 'Serviced Zoned Lands' comprises areas that are able to connect to existing infrastructure services and can therefore readily accommodate new development. The availability of services including foul sewer drainage, surface water drainage, a potable water supply and public lighting is central to the Tier 1 designation. Spatially, Tier 1 lands are located within or contiguous to the existing built up footprint of a settlement.

The Blackrock Road site constitutes Tier 1 'Serviced Zoned Land'. Assessments undertaken in support of an imminent planning application under the Strategic Housing Development (SHD) provisions have established that the site can connect to existing services that have capacity for residential development on the zoned lands. Pre-Application consultation with An Bord Pleanála for c.490 no. residential units is scheduled for 31st January 2019 (An Bord Pleanála reference ABP-303256-18). The request for pre-application consultation submitted to the Board included a Traffic & Transport Assessment and an Engineering Services Report prepared by project engineers WS Atkins International Limited and Finn Design Partnership, respectively, which confirmed capacity in existing services and infrastructure.

Pre-Connection Enquiries and consultations with Irish Water have confirmed that a "*new connection to the existing network is feasible*" for both potable water and wastewater. Surface water infrastructure will be provided within the site, with discharge to the existing surface water outfall to be kept within greenfield discharge limits. Existing footpaths on the Blackrock Road (R172) run northwards to Dundalk core and southwards to Blackrock, ensuring pedestrian connectivity. Consultations with the IDA to provide a direct pedestrian and cyclist access from the site to the Finnibar Industrial Estate for enhanced permeability at Bóthar Maol are ongoing. The TTA confirmed there is capacity within the existing road network to support development at the site, and confirmed that the site is well serviced by public transportation modes. Accordingly, the site represents 'Serviced Zoned Land' in accordance with the definition in the NPF.

It is of note that the phasing designations of the Dundalk & Environs Development Plan 2009-2015 do not reflect the Tier 1 status of the site. Variation 1 of that Plan, adopted 2011, designated the site 'Phase 3' on the sole basis that there were water services constraints. Those constraints no longer apply and the site can be serviced, as detailed above. Accordingly, the basis for the Phase 3 designation has been removed, representing a material change in the circumstances of the site that allows for the immediate delivery of development.

The delivery of development on zoned serviced land is central to the draft RSES. The Section titled '*Measuring Delivery through Active Land Management*' states that delivery of development is the primary method for assessing performance under the RSES, noting:

"Performance may be measured by the extent to which growth is delivered in accordance with targets and identified priorities. Good performance will enable optimal delivery of services and infrastructure

*to support development and critically, will also inform future review. It is likely that achieving good performance will **require a range of more active land management measures, beyond just zoning land**". (Emphasis Added)*

The Section titled '*Taking Account of Existing Plans*' acknowledges that land use zoning alone does not ensure the satisfactory levels of development. It is stated that planning authorities should also consider service capacity and likely rate of completion of development on zoned brownfield and greenfield sites. In this regard, Kingsbridge Consultancy Ltd. (McAleen & Rushe) have over 50 years' experience in delivering commercial and residential development in Ireland and the UK, and has actively progressed the delivery of residential units at the site. Significant time and expertise have gone into the preparation of an SHD application at the site, with the application to be lodged following the tripartite pre-application consultation scheduled for the end of January. The Tier 1 'Serviced Zoned Land' status of the site, as per the NPF definition, gives further certainty of delivery of development.

Accordingly, given the current planning and serviced site status of the site, it is submitted that it is appropriate to reference this Blackrock Road site in RPO 4.15, as proposed.

2.0 Strategic Importance to the Planned and Coherent Expansion of Dundalk

The Blackrock Road site supports the coherent and sequential development of Dundalk located contiguous to the defined urban core, established employment and educational hubs, is serviced by existing public transportation modes and municipal services, and is strategically located in relation to the emerging polycentric hubs in the wider Dundalk urban area.

Dundalk is one of just three Regional Growth Centres defined in the draft RSES with the ability to deliver significant economic and population growth. Section 4.5 states that "*Dundalk has a strong economic and employment base with a healthy equilibrium between resident workers and jobs and an established 'Louth Pharma Hub'*", as evidenced through the 1:1 workforce to jobs ratio reported in the 'Socio-Economic Evidence Baseline Report' (2017). The town has been the subject of significant Foreign Direct Investment, and capitalises on its strategic location on the Dublin to Belfast Economic Corridor.

The IDA and industrial zones of Dundalk already house multinational companies including, but not limited to, National Pen, PayPal, Xerox, Wasdell and Prometric, and is recognised as an emerging hub for new knowledge based and pharmaceutical sectors. Recent announcements include the construction of a new manufacturing facility for WuXi Biologics on IDA lands in Mullagharlin, Dundalk. The planned upgrade and expansion of Dundalk I.T., facilitated by a €18.5m investment from the Department of Education and Skills announced in September 2018, will drive enterprise through education and align the skills of the workforce with the requirements of commercial entities.

The Blackrock Road site is strategically located adjoining the Finnabair Industrial Estate, in close proximity and accessible to established and emerging employment and education areas, and to the urban centres of Dundalk and Blackrock, as shown in Figure 2 below.

Figure 2. Strategic Location of Site.

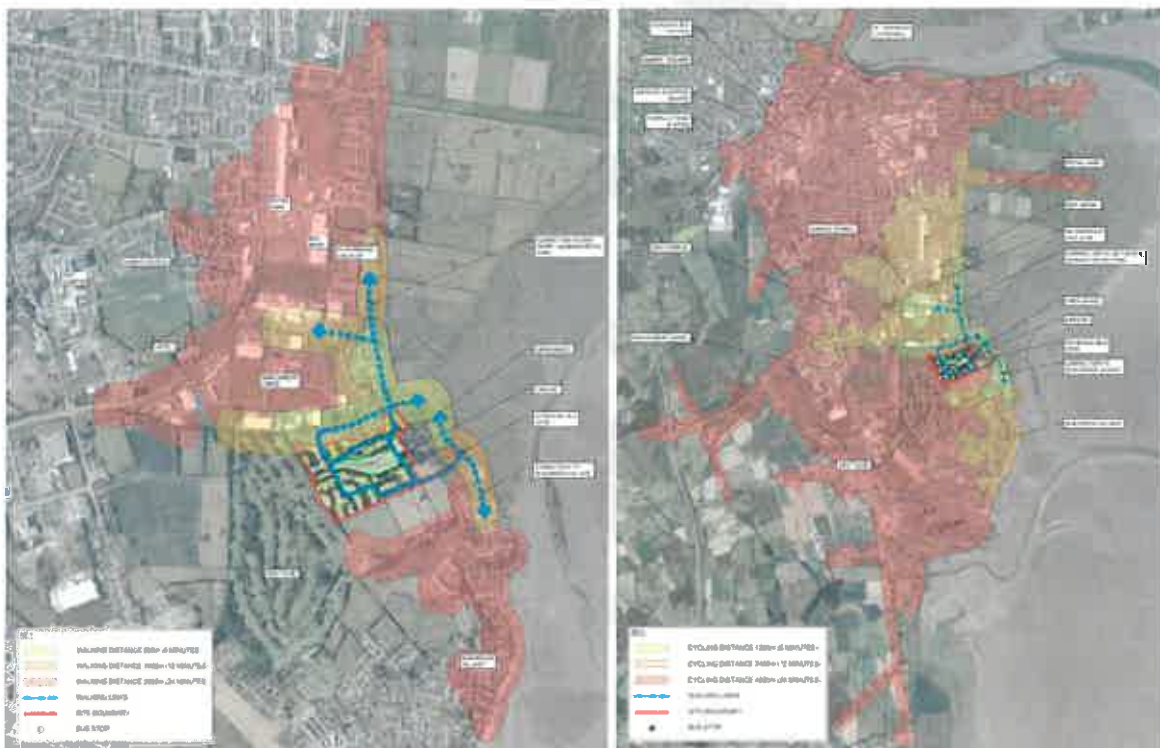


The Blackrock Road site is accessible to social and community services and established employment and education zones by sustainable modes, as shown in Figure 3, below. The site is within a comfortable 12 minute walk¹ of the Finnabair Industrial Estate and a 12 minute cycle to the employment lands at the Xerox Technology Park. The comfortable 24 minute walking radius from the site includes the following amenities: Blackrock Village, the Crowne Plaza Hotel, the retail area at Dunnes Stores, the DKIT sports campus and Na Piarasigh GAA Club, and the Dundalk Retail Park. The educational hub at Dundalk Institute of Technology is within a 24 minute cycle from the site. The N52, with its existing public transportation linkages, is within a 24 minute walk from the site.

¹ Based on a walking speed of 1.4 m/s and a cycling speed on 3.3 m/s.

Blackrock village centre is within 1.5 km of the site where there are cafes, restaurants, pubs and shops, including a pharmacy and several grocery stores clustered along the seafront. Blackrock supports a variety of social infrastructure including a community centre, nursing home, dental practice, two GP surgeries, Garda station, schools, childcare facilities, a credit union and two churches. The site is conveniently located near the Dundalk Retail Park that houses cafes, restaurants, and retail warehouses. There is also a neighbourhood centre on the N52 that is anchored by a Dunnes Stores and supported by a pharmacy and other units. The site is well serviced by existing leisure facilities including Dundalk Golf Club, Na Piersaigh GAA Club, Bay Football Club, DKIT Sports Arena and Fitness Centre and Dundalk Cinema.

Figure 3. Existing Walking times and Cycling Times from Blackrock Road Site, Excerpts from TTA submitted to An Bord Pleanála for Pre-Application Consultation under reference ABP-303256-18.



((These figures are based on a walking speed of 1.4 m/s and a cycling speed on 3.3 m/s)

Existing public transportation services in the area facilitate a sustainable modal split and reduced dependency on the private car. Halpenny Travel operate a local bus route between Blackrock Village and Dundalk along the Blackrock Road (R172). There is potential to provide a stop for this bus service at the entrance to the Blackrock Road site. Mathew’s Coaches operate commuter bus routes 900, 901, 902, 903 and 904 that run between Dundalk centre and Dublin, three of which go via Drogheda. These services stop on the N52, to the west of the Blackrock Road site. Bus Eireann operate the 100X route between Dundalk and Dublin, which stops at Dublin Airport.

The Blackrock Road site can deliver co-located, sequential residential development in accordance with the objectives of the NPF and the draft RSES. This Tier 1 ‘Serviced Zoned Land’ immediately adjoins significant

commercial and employment generating zones and can support compact residential development in the short term. Under the draft RSES, Dundalk is to grow to a city scale and therefore significant development is required to provide the necessary housing to support existing and future employment investment in the city. To reach this target, it is imperative that sites at sustainable locations that can deliver significant housing in the short term are appropriately identified in the draft RSES, as proposed.

3.0 Population Growth and Residential Development in the draft RSES

Urban consolidation sites, such as the Blackrock Road site, will play an important role in the delivery of development required to meet national and regional growth and sustainable development objectives.

As a Regional Growth town identified in the draft RSES, Dundalk is to act as a key driver for economic growth in the Region. To achieve a critical mass of population in Dundalk, and in the Dublin to Belfast Economic Corridor, the draft RSES prescribes a target population of 50,000 by 2031. Given that the population was c.39,000 in 2016, this growth target will see the population increase by c. 11,000 in the medium term².

The draft RSES seeks to facilitate the compact growth of town with 30% of development to occur within the existing built up area. RPO 4.15 requires the preparation of an Urban Area Plan (UAP) "*...to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of the town to ensure targeted compact growth of a minimum of 30% is achieved*". RPO 4.15 specifically refers to potential development areas at Clanbrassil Street / St. Nicholas Quarter, Long Walk Shopping Centre, Carroll's Village Shopping Centre, Williamson's Mall, Dunne's Park Street, Seatown / Port Harbour Area and Mount Avenue masterplan lands. The Mount Avenue masterplan lands are the only greenfield site listed in RPO 4.15, and therefore the other sites are fundamental in accommodating 30% compact growth.

Given the constraints typically associated with the release of urban consolidation and infill/brownfield sites in the short to medium term, and the requirement for significant housing to be delivered outside the core area, it is imperative that additional potentially suitable sites are identified in RPO 4.15 for consideration in the preparation of the UAP.

Variation No. 1 of the Dundalk & Environs Development Plan 2009-2015 gives an indication of the capacity of the urban core. Table 2.4 'Breakdown of lands within each phase' of this Core Strategy indicates that the 'Consolidation of Urban Core' areas accommodate approximately 9 hectares of brownfield/infill sites, with a stated capacity for 297 no. residential units, or 772 no. people³. While this Core Strategy assessment may be conservative, it highlights future difficulties in facilitating 30% compact growth, which brings a requirement for c. 1,250 no. units within the core area of Dundalk.

Constraints in the delivery of development at the Mount Avenue masterplan lands also impact upon the delivery of residential units, and targeted population growth. In this regard, the Mount Avenue masterplan lands incorporated 150 ha of zoned residential lands in the Dundalk and Environs Plan 2003-2008. During

² In the draft RSES the immediate short term is the period up to 2021, the short -medium term is from 2021 to 2026, the medium term is from 2026 to 2031 and the long term is the period post-2031.

³ The Core Strategy of the Dundalk & Environs Development Plan 2009-2015 uses a residential density of 35 units per hectare, and a residential occupancy rate of 2.6 per household.

that Development Plan period 97 units were delivered. The 2009-2015 Development Plan designated the lands Phase 1 with a housing allocation of 1,750 no. units. Since the adoption of the Plan in 2011 some 67 units have been permitted on the lands (Ref. 14520049), and it appears that commencement notices were submitted for 15 of those units. The phasing requirements in the Plan compounded the lack of supply from the Mount Avenue lands by precluding the delivery of residential units on other suitable sites. Consequently, Dundalk has failed to reach its Core Strategy 2016 target of 42,300 by a substantial margin, and is currently experiencing an acute housing shortage. It is imperative that the UAP does not repeat or compound this situation, and therefore it is appropriate that the RPO 4.15 includes unconstrained and serviced lands such as the Blackrock Road site.

Review of the planning history of the Mount Avenue lands reveals that development is constrained by road infrastructural issues. A refusal for planning permission on the lands cites potential traffic hazard on the Mount Avenue Road (Reg. Ref. 14/378 ABP Ref. PL15.244460). Subsequently, LIHAF funding has been awarded to upgrade c. 2 kilometres of the Mount Avenue Road to facilitate the development of 212 no. units up to 2021, and 1,200 overall. Given the stated capacity of the core urban area and the Mount Avenue masterplan lands, it is submitted that these areas listed in RPO 4.15 will not have sufficient capacity to meet the requirements of the draft RSES, to enable Dundalk to grow to a city scale with an additional 11,000 persons (c. 4,200 units) by 2031.

The scale of development required over the short to medium term necessitates that additional development sites are referenced in RPO 4.15 for consideration in the UAP for Dundalk. As Tier 1 'Serviced Zoned Land' contiguous to the established urban form, the Blackrock Road site has a role to play in the delivery of residential development in Dundalk. Accordingly, the proposed amendment to reference the Blackrock Road site under RPO 4.15 is appropriate.

4.0 Conclusion

This submission proposes that RPO4.15 is amended to include the following reference in bold:

- *Facilitate Urban Expansion through development of the Mount Avenue masterplan lands, and the **Blackrock Road site.***

In summary, the proposed amendment is supported by the following relevant planning and sustainable development considerations:

- The Blackrock Road Site constitutes Tier 1 'Serviced Zoned Land', in accordance with the definition in the NPF. Site investigations undertaken in support of an SHD application confirmed that the site can be connected to existing potable water, wastewater and surface water infrastructure. Existing footpaths facilitate pedestrian connectivity from the site, and there is sufficient capacity in the network for predicted traffic movements. Phasing designations in the Dundalk & Environs Development Plan 2009-2015 do not reflect the Tier 1 status of the site, as historical constraints in water services no longer exist, as evidenced by pre connection enquiries with Irish Water. The site can deliver residential units in the short term, with Kingsbridge Consultancy (McAleer & Rushe) investing time and expertise in an SHD application demonstrating capacity and intent to deliver housing units.

- The site supports the coherent and sequential development of Dundalk. The site is located contiguous to the defined urban core, established employment and educational hubs, is serviced by existing public transportation modes and municipal services, and is strategically located in relation to the emerging polycentric hubs in the wider Dundalk urban area. The site is contiguous to major employment zones and the emerging 'Louth Pharma Hub', Dundalk I.T., and the core areas of Dundalk and Blackrock. Community infrastructure and services are within comfortable walking or cycling distances, and the site avails of existing public transportation services, in accordance with the integrated settlement concept of the draft RSES.
- The population of Dundalk is to increase by c.11,000 by 2031 to achieve a critical mass of population and grow the town to a city scale. This significant growth will be guided by a UAP, which will identify and deliver strategic infill and consolidation sites to enable 30% compact growth. Objective RPO 4.15 lists six core areas suitable for infill development and regeneration, and one greenfield urban expansion area at the Mount Avenue masterplan lands. Analysis of the urban core and the Mount Avenue masterplan lands has established that these areas may be constrained in their capacity to deliver the c. 4,200 dwellings required to reach the target population. It is therefore necessary and appropriate to reference additional potentially suitable sites in RPO4.15 for consideration in the preparation of the UAP for Dundalk. The Blackrock Road site is particularly suitable in this regard by reason of its Tier 1 'Serviced Zoned Land' status, and advantageous position within the urban area adjoining employment generating commercial zones, sustainable transport modes, services and community infrastructure.
- The success of the RSES will be judged by the quantum of growth delivered in accordance with population targets, and it is acknowledged in the draft RSES that land use zoning alone does not ensure the delivery of units. Kingsbridge Consultancy (McAleer & Rushe) have over 50 years' experience in construction and delivery of development, and has invested heavily in realising residential development at the Blackrock Road site. Given the scale of development required for Dundalk to grow to a city scale, it is imperative that consolidation sites that can deliver units in the short term are appropriately identified in the draft RSES, as proposed.

On the basis of the foregoing, it is submitted that it is appropriate to include the reference to the Blackrock Road site in RPO4.15, as proposed

I trust that the Assembly will afford due regard to the points and issues raised in this submission.

Yours faithfully,



Declan Brassil
Declan Brassil & Co.

