

28<sup>th</sup> August 2025

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

**Re: Proposed Variation No. 3 to the Louth County Development Plan 2021-2027**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 3 (the proposed Variation) to the Louth County Development Plan 2021-2027 (County Development Plan).

As Louth County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

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

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

On adoption of the Variation, the Office will consider whether it has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

In the case of the proposed Variation, the outcome of the Office's assessment has determined that one recommendation and one observation are identified as well as other matters which the Planning Authority should address.

## **Overview**

The Office acknowledges the very extensive work undertaken by the Planning Authority in responding to the issues raised by the Office in its recommendations and observations to date in respect of the Dundalk Local Area Plan 2025-2031 (Local Area Plan) at the draft and material alterations stages of the process, which it has undertaken in a very positive and constructive manner.

The Office welcomes the rationale for the proposed Variation to update the County Development Plan to encompass and take account of the Local Area Plan, as adopted on 6<sup>th</sup> March 2025. Dundalk is identified as a Regional Growth Centre under the Regional Spatial and Economic Strategy for the Eastern Region, and the Local Area Plan as well as the County Development Plan play an important role in achieving a high level of self-sustaining employment and service provision to act as a regional economic driver and play a significant role for the wider catchment area.

The Office notes and welcomes the overall approach of your authority in the preparation of the proposed Variation to update various chapters and appendices of the County Development Plan to align with the Local Area Plan, in particular, the inclusion of policy objectives relating to the Dundalk Local Transport Plan (Dundalk LTP) in chapter 7 Movement and the updating of Policy Objective EE 43 of the County Development Plan to refer to the Mullagharlin Masterplan contained in appendix 4 of the Local Area Plan. As the Planning Authority will be aware, the Office supported the inclusion of a Masterplan for Mullagharlin within the Local Area Plan, placing it on a statutory footing.

The Office also welcomes the updating of Policy Objective IU 25 (section 10.2.6 Riparian Corridor) of the County Development Plan to align with Policy Objective INF 27 of the Local Area Plan relating to the environmental protection of the riparian corridors. The Office of Public Works also welcomes this.

Overall, the Office acknowledges that the numerous changes to the County Development Plan put forward via the proposed Variation have largely been transferred over in an accurate manner directly from the adopted Local Area Plan. This approach is welcomed.

Notwithstanding the above, the Office advises the Planning Authority to ensure that the wording of certain policy objectives relating to the Dundalk LTP are transferred accurately from the Local Area Plan into the County Development Plan.

Furthermore, while the Office welcomes the updated reference to the Mount Avenue Masterplan preparation in section 13.5, table 13.1 and Spot Objective No. 3 (section 13.6, table 13.2) of the County Development Plan, the Office recommends that the future Masterplan identifies the locations for the neighbourhood and community facilities within appropriately zoned lands and, in particular, identifies the location of the future education facilities in consultation with the Department of Education.

In addition, the Office requests that the Planning Authority cross reference certain policy objectives, tables and maps of the proposed Variation in order to ensure accuracy and consistency between the content of the Local Area Plan and the County Development Plan.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one (1) recommendation and one (1) observation under the following key themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Local transport plan</a>	-	<a href="#">Observation 1</a>
<a href="#">Provision of community and neighbourhood facilities in Mount Avenue Masterplan</a>	<a href="#">Recommendation 1</a>	-

## **1. Local transport plan**

The Office welcomes the preparation of the LTP included in the Local Area Plan and the principle of the proposed Variation's inclusion of a new policy objective relating to the

Dundalk LTP to be inserted into chapter 7, section 7.5.1. This will contribute to the integration of land use planning and transportation planning.

Having regard to the above, the proposed Variation identifies in table 1 that the new policy objective to be inserted into section 7.5.1 of the County Development Plan seeks to align with Policy Objective MOV 3 of the Local Area Plan. The wording of the new policy objective to be inserted into the County Development Plan by the proposed Variation is ‘to support the progression and implementation of projects identified in the Dundalk Local Transport Plan’. The Office notes that the proposed policy objective differs slightly from the wording of Policy Objective MOV 3 of the Local Area Plan. The wording of Policy Objective MOV 3 of the Local Area Plan has a dual emphasis, in that it both supports the implementation of the Dundalk LTP and also the individual projects identified therein.

As such, the Office considers that the Planning Authority should address this by reverting to the specific text of Policy Objective MOV 3 of the Local Area Plan and the associated footnotes as a policy objective within section 7.5.1 of the County Development Plan.

#### **Observation 1 - Integrated land use and transport planning**

Having regard to the need to integrate land use and sustainable transport planning and healthy placemaking and in particular to:

- RPO 8.1, RPO 8.6 and RPO 9.10 of the RSES;
- Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and Climate Action Plan 2025, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021);
- Policy Objective MOV 3 of the Louth County Development Plan 2021-2027 (County Development Plan) relating to the integration of land use with sustainable transportation infrastructure; and
- Policy Objective MOV 5 of the County Development Plan relating to the preparation of a Local Transport Plan for Dundalk,

the Planning Authority is advised to amend the proposed Variation's Local Transport Plans Policy Objective in chapter 7, section 7.5.1 of the Development Plan to replicate the wording of MOV 3 and the associated footnotes of the Local Area Plan.

## **2. Provision of community and neighbourhood facilities in Mount Avenue Masterplan**

The Office welcomes the updated reference to the Mount Avenue Masterplan preparation in section 13.5 and Spot Objective No. 3 (section 13.6) of the County Development Plan.

While the Office is satisfied with this overall approach, the Planning Authority should ensure that the future masterplan which requires integration of neighbourhood and community facilities within appropriately zoned lands, and in particular, future education facilities, should be identified in consultation with the Department of Education and any other relevant prescribed bodies.

### **Recommendation 1 - Provision of community and neighbourhood facilities in Mount Avenue Masterplan**

Having regard to the need to provide community facilities (including educational facilities) and neighbourhood facilities/centres within future Mount Avenue Masterplan area and in particular to:

- NPO 41 of the NPF and RPO 9.21 of the RSES for the alignment of planned population growth and school provision as a key enabler for housing development and sustainable communities;
- Policy Objective SC 7 of the Louth County Development Plan 2021-2027 (County Development Plan) relating to the reservation of land for social and community facilities;
- Policy Objective SC 25 of the County Development Plan to ensure adequate lands are zoned and reserved to cater for establishment of educational facilities: and
- Policy Objective SC 26 of the County Development Plan relating to the reservation of sites for educational use in areas identified for significant population increase,

the Planning Authority is recommended to include text within section 13.5, in table 13.1 and/or Spot Objective No. 3 within section 13.6, in table 13.2 of the County Development Plan to state that the future Mount Avenue Masterplan must identify the locations for neighbourhood centre and community facilities within appropriately zoned lands on associated maps/diagrams, and in particular identify the location of future education facilities in consultation with the Department of Education and relevant Prescribed bodies such as Transport Infrastructure Ireland and National Transport Authority.

## Other Matters

The Office has noted a number of administrative anomalies within the proposed Variation which the Planning Authority should consider. In the interest of clarity and consistency, the Planning Authority is requested to review and address the following:

- Policy Objective EE 43 (section 5.13.6) of the County Development Plan has been updated to refer to the Mullagharlin Masterplan (appendix 4 of the Local Area Plan) yet part of the policy objective continues to refer to the previous framework plan area. Review the reference to a framework plan in Policy Objective EE 43 and update it accordingly;
- ensure the content of updated table 8.8 of the County Development Plan (as per the proposed Variation) is consistent with table 10.5 of the Local Area Plan in particular the reference numbers and the full details of the locations listed;
- ensure the content of the updated table 8.15 of the County Development Plan (as per the proposed Variation) is consistent with table 10.6 of the Local Area Plan; and
- update the legend of the proposed Variation map 8.12 Trees & Woodlands of Special Amenity Value Dundalk in chapter 8, section 8.11.2 and appendix 8 of the County Development Plan by removing the reference to TWSAV and replacing it with reference to DLK (to correspond with the new reference numbers in the proposed Variation table 8.8 of the County Development Plan).

## Summary

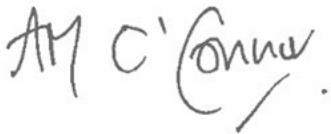
At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendation of the Office or otherwise

makes the plan in such a manner as to be inconsistent with the recommendation made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

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

Is mise le meas,

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A handwritten signature in dark ink, appearing to read 'AM O'Connor'.

**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015

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