



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

24th July 2026

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

Re: Proposed Variation No. 4 to the Louth County Development Plan 2021-2027

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 4 (proposed Variation) to the Louth County Development Plan 2021-2027 (Development Plan).

As Louth County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has undertaken this evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Overview

The proposed Variation introduces a number of changes to the Development Plan to support the implementation of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines). These include:

- amendments to Volume 1 of the Development Plan, including Chapter 2 (Core Strategy and Settlement Strategy), Chapter 3 (Housing), Chapter 4 (Social and Community), Chapter 10 (Utilities), and Chapter 13 (Development Management Guidelines);
- updates to Volume 1A Maps to reflect proposed zoning amendments in Drogheda, Dundalk, Ardee, and Dunleer, together with revised flood mapping;
- proposed changes to the written content of Volume 2 relating to Town and Village Statements; and
- proposed zoning amendments across 16 settlements in County Louth, as set out in Volume 3 of the proposed Variation.

The Office welcomes the work undertaken by the Planning Authority. The identification of Long-Term Strategic Opportunity Sites is supported in the Regional Growth Centres of Drogheda and Dundalk, together with the associated objectives, consistent with the Development Plans, Guidelines for Planning Authorities (2022) and the Housing Growth Guidelines.

The Planning Authority's comprehensive Settlement Capacity Audit (SCA) in Appendix 1 of the proposed Variation is also welcomed, and the Office commends its robust methodology, clear presentation, and detailed assessment. To improve clarity, transparency, and consistency across the Development Plan, the relevant sections should be updated to incorporate this information, and in particular to clearly state the quantum (in HA) of undeveloped residential zoned lands and the estimated housing yield (no. of units) at a county level.

In relation to the National Road Network and the proposed rezoning of lands at Drogheda DRG 1 and DRG 1a, site-specific objectives/spot objectives should be

included to protect the strategic function, operation, and physical integrity of the M1 motorway while ensuring an appropriate level of residential amenity. A recommendation is also made to strengthen active travel connections at Ardee ARD 5a, ARD 6a, and ARD 6b.

The Planning Authority's engagement with the Office of Public Works (OPW) prior to publication of the proposed Variation is welcomed, as is its continued commitment to implementing The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). An observation is included regarding climate scenarios and Sustainable Urban Drainage Systems (SuDS).

In addition, wastewater capacity constraints are noted in Clogherhead and Tullyallen, and continued engagement with Uisce Éireann on these matters is advised.

The following recommendations and observations set out below are intended to support the Planning Authority in further strengthening the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Core Strategy and Settlement Capacity Audit	-	Observation 1
Flood Risk Management	-	Observation 2
National Road Network	Recommendation 1	-
Sustainable Mobility	Recommendation 2	-

2. Core Strategy and the Settlement Capacity Audit

The Office welcomes the Planning Authority's comprehensive SCA presented in Appendix 1 of the proposed Variation and its robust methodology. The Planning Authority is commended for the layout and detail within the SCA, including the provision of information relating to scale, density and potential yield of the proposed zonings as presented in the SCA. It is noted that the SCA includes Table 4 which sets out the quantum of residential development proposed as part of the Variation

(135.57ha) and the associated yield (between 3074 – 4115 units), although this information is not included in the written statement.

Similarly, while the SCA provides information on the quantum of undeveloped residential zoned lands within the current Development Plan at a settlement level, the overall quantum of undeveloped residential zoned lands within the Development Plan is not set out. Furthermore, the associated potential yield in units for each settlement and the county overall is not set out in the SCA. It is also noted that this information has not been reflected in the core strategy and settlement strategy set out in section 3.2 of the main Variation document.

Related to the above, the Planning Authority is advised to ensure that the densities referenced for each settlement within the SCA reflect the content of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

In order to ensure clarity and transparency in the Development Plan as varied, and to provide a clear link between the evidence base and the proposed strategy, the SCA and Section 3.2 of the main Variation document should be updated to incorporate this information.

Observation 1 - Core Strategy and Settlement Capacity Audit

In order to ensure clarity within the core strategy, the Settlement Capacity Audit (SCA) and the co-ordination of housing and infrastructure, and having considered the following:

- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objectives 1 and 2 and section 2.4 to incorporate the objectives of the Housing Growth Guidelines into development plans;
- NPO 101, NPO 102 and NPO 103 of the NPF to consider the serviceability of land zoned for development;
- the Development Plans, Guidelines for Planning Authorities (2022); and

- Sustainable Residential Development Guidelines for Planning Authorities (2024),

the Planning Authority is advised to:

- (i) insert the Settlement Capacity Audit section 6.0, Table 4 into core strategy, Chapter 2 Core Strategy and Settlement Strategy, Volume 1 of the Louth County Development Plan 2021-2027 (the Development Plan);
- (ii) review the densities set out in the SCA against with the content of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (Compact Settlement Guidelines);
- (iii) update the SCA to include the potential yields for the available undeveloped residential zoned lands (h) within the current Development Plan for each settlement ensuring that the proposed densities referenced have due regard to the Compact Settlement Guidelines; and
- (iv) set out the overall quantum of undeveloped residential zoned lands (ha) within the Development Plan and the associated yield (units) into the core strategy, Chapter 2, Volume 1 of the Development Plan.

3. Flood Risk Management

The Office notes that section 2.2 of the Strategic Flood Risk Assessment (SFRA) considers the future climate risk scenario. It identifies parts of two of the proposed rezoning sites as being at risk based on OPW Future Climate Risk Scenario Area Mapping. This applies to Drogheda DRG 10 (a rezoning to A2 new residential phase 1 zoning) and a small portion of Ardee ARD 12 (a rezoning to A1 existing residential to reflect that site has been built out). It is noted that these sites are referenced in the SFRA as Drogheda Site 10 and Ardee Site 12.

The SFRA sets out specific text relating to the sites, which it states ‘has been integrated into the Variation’ in order to significantly limit future development. However, the text is not included in the proposed Variation and there is no reference to where it is to be inserted in the Development Plan. The Planning Authority is advised to integrate the proposed text relating to the two sites into the proposed Variation.

The Office further advises that the proposed Variation should promote nature-based solutions to reduce surface water runoff while delivering wider benefits for water quality and biodiversity. The SFRA should provide guidance on the suitability of SuDs for key development sites and identify opportunities for integrated, area-based green infrastructure solutions rather than relying solely on site-by-site measures.

In proposed Amendment 50, the Office welcomes the requirement for a robust evidence-based approach to surface water drainage and the requirement for a surface water management plan as part of the masterplan for the lands at Dundalk south of the Ardee Road. In this regard, it is considered that the proposed masterplans for Ardee and Dunleer identified in Amendment 50 should also include reference to SuDs. The wording of Amendment 50 of the proposed Variation should be updated to reflect this.

Observation 2 - Flood Risk Management

Having regard to flood risk management, and having considered the following:

- NPO 77 of the NPF to integrate sustainable water management solutions and nature-based solutions;
- NPO 78 of the NPF to promote sustainable development by ensuring flooding and flood risk management informs place-making, taking account of the potential impacts of climate change on flood and flood risk; and
- the Planning system and Flood Risk Management Guidelines for Planning Authorities (2009),

the Planning Authority is advised to:

- (i) update the proposed Variation to integrate the SFRA text from section 2.2 relating to Ardee site 12 (proposed rezoning Ardee ARD 12) which states:

This site has lands identified as being at risk under future climate scenarios (see Appendix I of the SFRA Addendum). Any new uses at these at-risk lands will generally be limited to less vulnerable uses, while facilitating existing development uses that may require small scale development such as small extensions. This limitation shall take primacy

over any other related land use zoning provision. Any proposals for development at this site shall demonstrate compliance with the Plan's flood risk management and drainage provisions;

- (ii) update the proposed Variation to integrate the SFRA text from section 2.2 relating to Drogheda site 10 (proposed rezoning Drogheda DRG 10) which states:

This site has lands identified as being at risk under future climate scenarios, (see Appendix I of the SFRA Addendum). Finished floor levels of new developments at these lands shall be set above the 0.1% Annual Exceedance Probability High-End Future Climate Scenario design flood level, including an appropriate freeboard allowance, having regard to the findings of site-specific flood risk assessment. Sustainable Urban Drainage Systems that seek to minimise flood risk elsewhere shall be incorporated into new developments at this site.;

- (iii) amend the Strategic Flood Risk Assessment to incorporate an integrated and area-based provision of Sustainable urban Drainage Systems (SuDS) and green infrastructure related to the proposed rezoned lands where appropriate in order to avoid reliance on individual site-by-site solution; and
- (iv) include reference to SuDS and Nature Based Solutions in the description of elements to be included in the proposed Ardee and Dunleer masterplans listed in Table 13.1, chapter 13 Development Management Guidelines of the Development Plan, proposed under Amendment 50 of the proposed Variation.

4. Integration of land use and transportation

4.1 National Road Network

The Office notes that the proposed Variation seeks to rezone lands for residential use in close proximity to the M1 motorway at Drogheda DRG 1 and 1a. The M1 is a strategically important route that links Dublin with Belfast and forms part of the EU Ten-T Core Network. In order to maintain the strategic function, operation and physical integrity of the M1 and to protect future residential amenity at this location it

is recommended therefore that site specific objectives or spot objectives are inserted into the proposed Variation.

Recommendation 1 - National Road Network

Having regard to the need to maintain the strategic function, operation and physical integrity of the M1 as well as protecting future residential amenity and having considered:

- the Spatial Planning and National Road Guidelines for Planning Authorities (2012);
- RPO 8.11 of the RSES to support the improvement and protection of the EU-Ten-T network and the strategic function of the Dublin to Belfast Road Network,
- Policy Objective MOV 45, Section 7.8.3, Chapter 7 of the Louth County Development Plan 2021-2027 to protect the strategic transport function of national roads including motorways; and
- Policy Objective MOV 46, Section 7.8.3, Chapter 7 of the Development Plan to support the improvement and protection of the EU Ten-T network and the strategic function of the Dublin to Belfast Road Network,

the Office recommends that the Planning Authority includes two site specific objective/spot objectives in the proposed Variation relating to Drogheda DRG 1 and 1a which address the following:

- (i) any proposals in proximity to or within national roads or Transport Infrastructure Ireland (TII) managed areas shall be required to demonstrate the protection of the physical integrity and operation of the M1 and associated infrastructure (such as drainage and structures) and compliance with all relevant TII Publications (Standards and Technical) requirements; and
- (ii) appropriate mitigation measures associated with the location in proximity to the M1, including management for the protection of residential amenity, must form part of any future development.

4.2 Sustainable Mobility

The proposed Variation provides a valuable opportunity for the Planning Authority to strengthen permeability linkages between the proposed New Residential zoned lands and local services, including town centres. Providing and enhancing these connections will help to ensure that both existing and future communities can readily access active travel options such as walking and cycling, while supporting more sustainable and integrated travel patterns.

In particular, given the scale and peripheral location of the proposed New Residential rezonings at Ardee ARD 5a, Ardee ARD 6a and Ardee ARD 6b, active travel permeability to adjacent residential lands and the town centre could be improved. In this context, the Office advises that the Planning Authority gives consideration to how accessibility can be improved and includes site-specific objectives/spot objectives to support improved active travel measures at these locations.

Recommendation 2 - Sustainable Mobility

Having regard to the need to integrate land use and sustainable transport planning and healthy placemaking and having considered:

- NPO 37 of the NPF to prioritise walking and cycling accessibility to proposed developments;
- RPO 9.10 of the RSES relating to the creation of healthy and active places which prioritise and promote cycling and walking;
- Climate Action and Low Carbon Development Act 2015, as amended;
- Climate Action Plan 2025;
- the National Sustainable Mobility Policy (2022); and
- section 7.6.11, chapter 7 of the Louth County Development Plan 2021-2027 relating to cycling and walking, including policy objective MOV27 relating to permeability and improved connections between existing and new neighbourhoods,

the Planning Authority is recommended to identify measures to provide permeability linkages for walking and cycling between the proposed A2 New

Residential land Phase 1 at the locations listed below and local services and town centres. Where appropriate, specific local objectives should be included in the Variation in relation to the following:

- (i) Ardee ARD 5a;
- (ii) Ardee ARD 6a; and
- (iii) Ardee ARD 6b.

5. Other matters

The text set out in appendix 3 of the main Variation document relating to the proposed zoning at Collon, site reference COL 2, identifies that there is a spot objective associated with this location. However, a spot objective symbol is not shown on the proposed zoning map extract, and it is noted that Amendment 52, table 13.2 of the main Variation document does not list a spot objective for this location. The Planning Authority is advised to provide clarification relating to this matter.

6. Summary

The Office requests that the Planning Authority addresses the recommendations and observations set out above.

As part of this process, the Chief Executive's report to the elected members, prepared under section 58(11) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

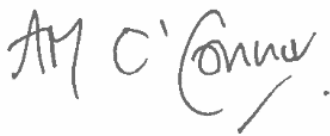
Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National Transport Authority during the plan preparation process, within **one week** of adoption;
- inform the Office, **as soon as practicable**, where it decides not to comply with a recommendation, including the reasons for this decision; and

- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, appearing to read 'AM O'Connor' with a stylized flourish at the end.

Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
