



Material Contravention Statement

Strategic Housing Development: Application to An Bord Pleanála Residential Development

at
Blackrock,
Dundalk,
Co. Louth

on behalf of
Kingsbridge Consultancy Limited

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1 INTRODUCTION

This statement has been prepared on behalf of Kingsbridge Consultancy Limited in respect of a proposed residential development of 483 no. units and a creche at Blackrock Road, Blackrock, Dundalk, County Louth, to address matters that maybe considered to materially contravene the Development Plan, in accordance with Section 8 (1)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The 2016 Act allows the Board to grant permission for a Strategic Housing Development that materially contravenes a development plan (other than in relation to the zoning of the land) with regard to the requirements of section 37(2)(b) of the Act of 2000, which are as follows;

- (i) the proposed development is of strategic or national importance,
- (ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or
- (iii) permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or
- (iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

The relevant consideration in respect of the current application relates to the phasing status of the lands, being designated Phase 3 in Variation 1 (August 2011) of the Dundalk & Environs Development Plan 2009-2015, which amended the Core Strategy of that plan. The relevant phasing policy is:

POLICY CS2: "To apply the phasing of new residential development as per the phasing strategy set out, whereby residential development, other than infill, brownfield or mixed-use development shall only be permitted in the identified area within Phase 1. Only on completion of the development of 75% of these lands shall subsequent phasing be considered for additional residential development". (Variation 1 adopted August 2011).

It is submitted that the Board can consider granting permission for the proposed development under the provisions of requirements of section 37(2)(b) in contravention of Policy CS2 of the Dundalk & Environs Development Plan 2009-2015 for the summary reasons set out below and elaborated upon in sections 2-4 below.

It is submitted that the strategic importance of the lands is established by: the scale and capacity of the site being significantly in excess of the 100 units that constitutes 'strategic' development for the purposes of the Act; the locational context of the site; national policy including the National Planning Framework (NPF) and RSES made thereunder; and well documented housing shortages and the recent increases in homelessness in County Louth and the failure of *inter alia* the planning policy framework and market to deliver units to date.

Furthermore, there are conflicting objectives relevant to the subject site in respect of the Core Strategy and the phasing of development under the Development Plans. These matters are summarised as follows:

- The Dundalk Town Plan, and in particular Objective CS2, is no longer consistent with the County Development Plan (CDP) Core Strategy and current national and regional policy, for the following reasons:
 - Variation 1 of the Town Plan (August 2011) designated 50 hectares for Phase 1 residential development (1,750 no. units) **up to 2016**.
 - The County Development Plan Core Strategy of 2015 allocated an **additional 1,600 units between 2016 and 2021**, which required an additional 57 hectares of Phase 1 land up to 2021. No Variation or LAP was prepared to allocate this additional land, as provided for in the County Development Plan. Policy CS2 is preventing the release of necessary lands to meet the housing land allocations of the County Plan for 2016 to 2021 and is therefore preventing the planned and sustainable delivery of housing.
 - This conclusion is supported by the following summary analysis of housing delivery in Dundalk between 2010 and 2019, which demonstrates that delivery is significantly below the targets contained in the Core Strategies¹:
 - In 2011, Variation No. 1 of the Plan identified 4,246 units 'Committed' units ('Sites with Planning Permission'). Approximately 1,569 of these units are Phase 3 or on lands zoned for 'Retail, Leisure, recreation and community'.
 - The total housing target in the Core Strategy for Dundalk from 2010 to 2021 is 3,350 units, comprising 1,750 no units under the Town Plan and 1,600 under the CDP. Discounting units not identified as 'Committed' under the 2011 Variation to the Town Plan, there is a current under-provision of 2,950 no. permitted units.
 - Since 2010, only 67 no. units have been permitted on Phase 1 lands and only 10 no. of these have been constructed (as per Site Visit April 2019). Recent applications reveal that the Phase 1 lands are constrained in their ability to accommodate housing and subsequently LIHALF funding has been awarded to deliver 212 no. dwellings up to 2021 and 1,200 overall, which is substantially below the housing allocation for these lands.
 - On all of the 'Phase 1', 'Phase 2', 'Phase 3' and 'Committed' residential lands, c. 573 no. units are the subject of commencements notices on the BCMS.
 - Commencement notices have been lodged for 82 no. units that had not been allocated in the Core Strategy as 'Committed'. Accordingly, there is currently an under-provision of 1,518 no. units to meet the housing allocation of 1,600 units in the CDP up to 2021. This compounds the significant under-provision of 1,740 units on the Phase 1 lands.
 - The area of land allocated for housing under the Town Plan was based on an average residential density of 35 units per hectare. The residential densities permitted on residential lands to date are in the region of 26 units per hectare. This results in a 25% under provision of land under

¹ The detailed analysis is presented in the Appendices to this Report

Objective CS2.

- This analysis is further supported by an analysis of Census 2016 which has identified that the census town of Dundalk² was 3,296 persons short of the CDP population target in 2016.
- The National Planning Framework prioritises Dundalk and Drogheda for growth and consolidation given their strategic location on the nationally important Dublin-Belfast Economic Corridor. The Phase 1 lands and non-commenced extant permissions have fallen significantly short of meeting the housing targets necessary to sustain population and economic growth in this key regional settlement. As noted, Census 2016 identified that the census town of Dundalk³ was 3,296 persons short of the CDP population target, equating to 1,220 no. new dwelling units. As such, the implementation of Policy CS2 is inconsistent with and impedes the implementation of national policy objectives.
- The implementation of Policy CS2 is also superseded by, and is inconsistent with, the Government's policies and objectives to tackle the national housing crisis as set out in Rebuilding Ireland Action Plan for Housing and Homelessness, and as implemented *inter alia* through the NPF. Since July 2016 and the launch of the '*Rebuilding Ireland – an Action Plan for Housing and Homelessness*', homelessness in County Louth has increased by 50%.
- The location of the site represents a sustainable location for urban consolidation as advocated in the NPF: '*Ireland's future homes will be located in places that can support sustainable development - places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change*' (NPF page 92). Consistency with this provision is demonstrated throughout this Report and the accompanying documentation. In summary:
 - At a strategic level, Dundalk is a major national and regional employment economic centre designated for population and employment growth in the NPF. Population growth has lagged behind employment growth in Dundalk and housing supply shortages now represent a significant constraint to economic and employment growth⁴. The lands are strategically located relative to the established employment nodes and the Dundalk Institute of Technology and as such are well located '*to support growth, innovation and the efficient provision of infrastructure,*' as advocated in the NPF.

² Under the 2016 Census, Census towns that previously combined legal towns and their environs have been newly defined using the standard census town criteria.

³ Under the 2016 Census, Census towns that previously combined legal towns and their environs have been newly defined using the standard census town criteria.

⁴ The Independent Regional. The Argus. (23 February 2019). <https://www.independent.ie/regionals/argus/news/housing-an-issue-in-bringing-new-employment-37827704.html>

The Independent Regional. The Argus. (7 April 2018). <https://www.independent.ie/regionals/argus/news/concern-over-homeless-rise-36766671.html>

Talk of the Town (28 February 2019) <https://www.talkofthetown.ie/homeless-figure-in-louth-jumps-by-almost-26-in-january/>

Talk of the Town (18 June 2018) <https://www.talkofthetown.ie/those-on-housing-waiting-list-in-louth-face-waiting-up-to-16-years-for-a-home-warns-breathnach/>

Irish Mirror (15 May 2018) <https://www.irishmirror.ie/news/irish-news/rising-rents-causing-homeless-fears-12536462>

- The lands are located contiguous to the designated 'Town Centre Urban Consolidation Area' as identified on map 2B of Variation 1 of the Town Plan, and immediately to the north of the established urban area of Blackrock. Dundalk can be considered as a Polycentric settlement with significant services, employment and educational nodes at the town centre, the IDA and Finnabair Industrial Estates and the Xerox Technology Park, Dundalk Institute of Technology and Blackrock. The lands represent a sustainable infill/consolidation site between and accessible to all of these nodes by sustainable transportation modes and are therefore '*accessible to a range of local services, can encourage the use of public transport, walking and cycling*', as advocated by the NPF (Refer to the Transport and Accessibility Report prepared by Atkins, and excerpts from that report in Appendix D)
- The lands were designated 'Phase 3' on the sole basis that there were water services constraints. Those constraints no longer apply and the lands can be serviced, as evidenced by correspondence from Irish Water. Accordingly, the basis for the Phase 3 designation has been removed, representing a material change in the circumstances of the site such that the lands are Tier 1 'Serviced Zoned Land' in accordance with the NPF definition, and can deliver housing in the short term.

Having regard to the foregoing, it is submitted that Policy CS2 is not consistent with the core strategy of the County Development Plan and undermines the implementation of national and regional policy, including the Government's '*Rebuilding Ireland – an Action Plan for Housing and Homelessness*'. It is considered that the proposed development of this Tier 1 'Serviced Zoned Land' accords with the planned and sustainable development of Dundalk as described in the County Development Plan, the RSES and the NPF.

2 PLANNING CONTEXT AND CORE STRATEGY

The Louth County Development Plan 2015-2021 and the Dundalk & Environs Development 2009-2015 (and Variation 1 in 2011) incorporate a Core Strategy for their respective areas. The recently adopted Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) prescribes a population target for Dundalk that will form the basis of the Core Strategy in the next Louth County Development Plan.

There are conflicting objectives in the Development Plans and Regional Strategy with respect to population growth in Dundalk. The Dundalk & Environs Development Plan designates three phases for residential development and provides for 1,750 no. units in the first phase up to 2016. Subsequent Plans, including the County Development Plan and the RSES, both allocate additional population growth to Dundalk post-2016. However, the allocated growth has not been incorporated into the Dundalk Plan by way of a variation or a review of the Dundalk town plan. As such, the Dundalk plan is not consistent with and prevents the implementation of the strategies, policies and objectives of higher order plans on the basis that it only permits development on Phase 2 and 3 lands once the Phase 1 lands are 75% developed. As such, the Core Strategy of Dundalk & Environs Development Plan 2009 conflicts with the policies and objectives of the Louth County Development Plan and the RSES.

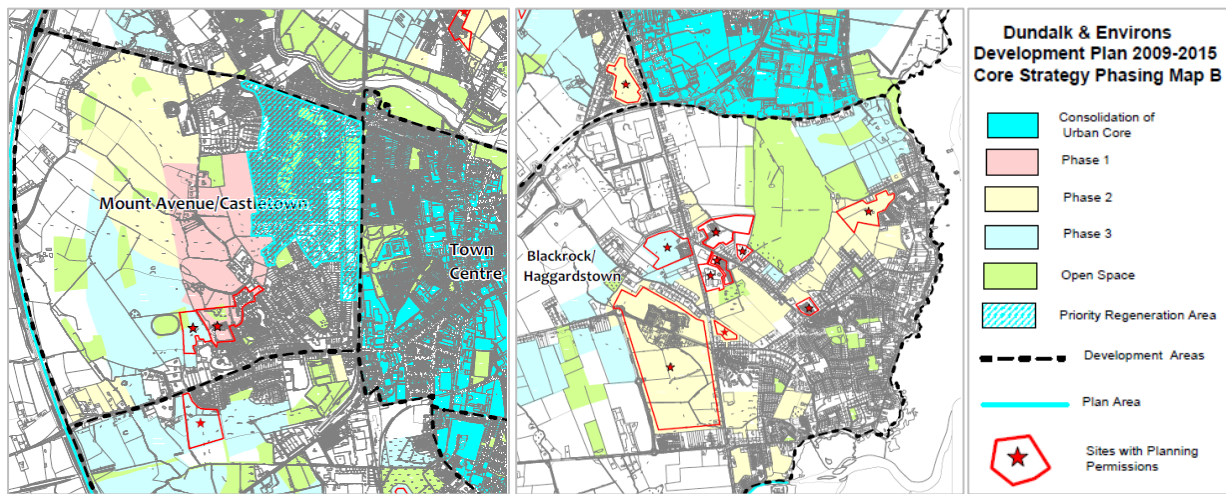
2.1 Dundalk & Environs Development Plan 2009-2015

The Dundalk & Environs Development Plan 2009-2015 was adopted by Dundalk Town Council on 25 November 2009. Since its adoption, the Plan has been the subject of two variations: Variation No 1 was adopted on the 29th August 2011 and incorporated the Core Strategy into the Plan, and Variation No 2 was adopted during the summer of 2013 to rezone lands at Ashling Park.

The site is the subject of two zoning objectives; the proposed development lands are zoned 'Residential 2' and the central area is zoned 'Recreation, Amenity and Open Space'. The objective for the 'Residential 2' lands is *"To provide for new residential communities and supporting community facilities subject to the availability of services"*.

The Core Strategy for Dundalk was adopted through Variation No. 1 of the Plan in 2011. This Core Strategy was based on the Housing Survey undertaken in 2010 and evaluated six broad geographical areas in respect to the availability of social and physical infrastructure in response to an oversupply of zoned lands in the housing market. The Town Centre and the residential lands at Mount Avenue/Castletown scored most favourably and were therefore designated Phase 1. Phase 2 lands are those areas with existing services (water, sewerage, roads), and Phase 3 lands comprise areas without public services that would require public sector investment to accommodate development. The site was designated Phase 3 due to infrastructural constraints that have now since been overcome.

Figure 2.1. Excerpts from Dundalk & Environs Development Plan 2009-2015 Core Strategy Phasing Map B with the subject site shown in red hatching.



The Phase 1 lands at Mount Avenue/Castletown were allocated 1750 no. housing units at a residential density of 35 units per hectare to be developed within the life of the Plan, (Table 2.1 below). In designating 1,750 no. units to Phase 1, the strategy took account of the 4,246 no. ‘Committed’ units on sites that had planning permissions at the time of the 2010 housing survey, and states the following;

“Phase 1, which are expected to be realised within the life of the development plan, do not affect the status of commitments that already have the benefit of planning permission within the plan area”.

Table 2.1 Excerpt from Variation No. 1 of Dundalk & Environs Development Plan 2009-2015

Table 2.4: Breakdown of lands within each phase

Phase	Area of land (hectares)	No of units	Population projection. (2.6 per household)	Year allocation/ target.
Consolidation of Urban Core	(Possible) 9	297	772 (town centre densities)	2010-2016
Phase 1	50	1,750	4,550	2010- 2016
Phase 2	233	8155	21203	
Phase 3	575	20,125	52,325	

Policy CS2 of the Plan states that the Planning Authority will only permit new residential development on infill sites or within the Phase 1 lands until 75% of those lands are developed. Policy CS2 of the Plan states:

“To apply the phasing of new residential development as per the phasing strategy set out, whereby residential development, other than infill, brownfield or mixed use development shall only be permitted in the identified area within Phase 1. Only on completion of the development of 75% of these lands shall subsequent phasing

be considered for additional residential development”.

The planned population growth and housing allocation for Dundalk and Environs was predicated on the early delivery of 1,750 no. units within the ‘Serviced Area in Mount Avenue/Castletown’ up to 2016⁵, with no land or housing allocation beyond this date.

2.2 Louth County Development Plan 2015-2021

The Louth County Development Plan was adopted on 28 September 2015. Chapter 2 contains the overarching Core Strategy and Settlement Strategy for the County, and places Dundalk at the top of the settlement hierarchy with Drogheda.

Under Section 2.9 of the strategy 60% of the population growth for the County is to be directed to Dundalk and Drogheda, which amounts to an additional 4,322 people in Dundalk Town and Environs up to 2021. This predicted population increase is stated to require an additional 1,600 no. residential units in Dundalk and Environs, based on an occupancy level of 2.7 persons per dwelling⁶. To accommodate this planning population growth, Table 2.5 states that Dundalk and Environs requires 51 hectares of land for residential development up to 2016 and an additional 57 hectares up to 2021, based on an average residential density of 42 units per hectare across all residential zoned lands.

Table 2.2 Excerpt from Louth County Development Plan 2015-2021

Table 2.5 Potential Housing and Population Growth within Settlements								
	Extrapolated Population Levels 2016	Population Target Levels 2021	Household Allocation to 2021	Average Density	Existing Undeveloped Land	Housing Land Required (ha) up to 2016	Housing Land Required (ha) up to 2021	Excess (including Strategic Reserve)
Dundalk & Environs	42,300	46,622	4,322	42	904	51	57	796

It is stated in the County Plan that the phasing of housing lands in Dundalk will be dealt with in the Core Strategy of the LAP however no such LAP has been drafted and the current Dundalk Town and Environs Development Plan has not been varied in response to the core strategy requirements of the County Plan to allocate the additional 57 hectares of land for residential development from 2016 to 2021.

It is of note that Dundalk has failed to meet its population targets described under the County Plan up to 2016, falling 3,296 short of the population target of 43,300 listed in Table 2.5 of the Plan. This population shortfall equates to circa 1,220 no. new dwelling units⁶.

⁵ The Core Strategy of the Dundalk & Environs Development Plan 2009-2015 describes a population allocation from 2010-2016 to align with the population allocations of the Border Regional Planning Guidelines 2010-2022.

⁶ As used in 2.9.1 ‘Allocation of Population in the Settlement Hierarchy’ of the Development Plan. It is stated in the Plan that this occupation rate of 2.7 persons per unit arises from the 2011 Census of Population.

2.3 Regional Spatial and Economic Strategy for the Eastern and Midland Region

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) was issued for public consultation on 5 November 2018, and consultation on the proposed amendments to this strategy ended on 12 April 2019. The RSES was adopted by the Regional Assembly 3rd May 2019 and comes into effect on the 28th June 2019.

The 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. It is planned that the population of Dundalk will grow to 50,000 by 2031, which equates to a population increase of c. 11,000 in the medium term⁷ and an overall requirement for c. 4,000 residential units⁸. The RSES prioritises compact growth and under RPO 4.15 development with the built footprint should comprise 30% of planned growth, which equates to c. 3,300 people or c.1,200 residential units⁸.

It is stated under RPO 4.15 that an Urban Area Plan (UAP) for Dundalk will be prepared by Louth County Council to provide a coordinated planning framework to deliver both residential and economic development in the town. While there is a prescribed deadline for the review of the County Development Plan to accord with the RSES there is no such deadline for the preparation of the UAP or the variation of the Dundalk & Environs Development Plan 2009-2015 to account for or facilitate the growth targets in the RSES. It is submitted that Policy CS2 of the Dundalk & Environs Development Plan 2009 severely restricts residential development in Dundalk and therefore conflicts with the objectives of the RSES.

⁷ In the 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.

⁸ Based on an occupancy rate of 2.7 persons per dwelling as used in Section 2.9.1 'Allocation of Population in the Settlement Hierarchy' of the Development Plan.

3 PLANNING HISTORY AND COMMENCEMENT OF DEVELOPMENT

The delivery of residential development in Dundalk has not met the housing allocations or population targets of the Dundalk & Environs Development Plan 2009 or the Louth County Development Plan 2015. To assess this under supply, a review of the planning history for the Phase 1, 2 and 3 residential lands and 'Sites with Planning Permissions' identified in Variation No. 1 of the Dundalk & Environs Development Plan 2009 was undertaken and the Building Control Management System (BCMS) was assessed, please see Appendices A, B and C.

In summary, the assessment in sections 3.1 to 3.3 below found that just 10 no. houses have been built to date on the lands designated for Phase 1 development under the Dundalk & Environs Development Plan 2009. This represents an under-provision of 1,740 no. units up to 2016. The implications of this under-supply are far reaching as Policy CS2 prevents the development of Phase 2 and 3 residential until 75% of the Phase 1 lands are developed. Development in Dundalk has been limited to sites that had planning permission at the time of the 2010 housing survey, as all other residential lands were constrained by Policy CS2. It appears that only a single new multi-unit scheme has been permitted in Dundalk since 2010, that being the SHD proposal for 158 no. units on Phase 2 lands at Old Links Road that was granted permission by the Board on the 2 April 2019.

Overall, this review identified that 390 no. new⁹ residential units have been permitted on residential lands between 2010 and 2019, which represents an under provision of 2,960 no. units when compared to the housing allocation of 1,750 unit up to 2016, and 1,600 units up to 2021. Fewer still units have been the subject of commencement notices and the review of the Building Control Management System (BCMS) found commencement notices for approximately 97 no. of these new residential units between March 2014 and April 2019, including the 15 no. units with commencement notices attributed to Phase 1. There are approximately 82 no. units with commencement notices on Phase 2, 3 and other lands that count toward the County Development Plan housing target of 1,600 units up to 2021, which represents an under-provision of circa 1,518 no. units.

It is evident that the number of dwellings permitted or developed between 2010 and 2019 falls very significantly short of the allocations in the Core Strategies of both the town and County plans, and has created a significant under supply of housing that it is submitted can only be addressed by facilitating development on suitable zoned and serviced Phase 2 and 3 residential lands pending the making of a new plan for the town.

3.1 Development of Phase 1 Lands

The Core Strategy of the Dundalk & Environs Plan 2009-2015 designates a single Phase 1 area of 50 hectares in the Mount Avenue/Castletown area to the west of the town centre. Under the Plan this Phase 1 area was to accommodate 1,750 no. residential units between 2010 to 2016. The planning history review and site visit undertaken in April 2019 found that just 10 no. dwellings have been constructed on the Phase 1 lands between 2010 and 2019.

⁹ In this assessment, new housing refers to units that were not 'Committed', extant or held planning permission at the time of the Housing Survey 2010 and the Variation No. 1 of Dundalk & Environs Development Plan 2009.

Figure 3.1 Aerial Image of Phase 1 Lands with Relevant Application Subject Sites Shown.



Reference	Status (April 2019)	No. of Units Permitted	No. Units Development
Reg. Ref. 14520049	Granted: 8 Dec. 2014 Expires: 7 Dec. 2019	67	10
Reg. Ref. 14378, ABP Ref. PL15 .244460	Refused: 18 June 2015	-	-
Reg. Ref. 18943, ABP Ref. PL15 .303628	Undecided	-	-
Phase 1 Residential: Housing Allocation Dev. Plan 2009-2015		1,750 no. Units	
Phase 1 Residential: Undeveloped Units		1,740 no. Units	

Since 2010 and the Housing Survey that informed the Core Strategy, just one planning permission has been granted on the Phase 1 lands in Mount Avenue. Reg. Ref. 14520049 was granted 8 December 2014 and comprised 67 no. detached and semi-detached houses. A review of the Building Control Management System (BCMS) found commencement notices for just 15 no. units and the site visit undertaken in April 2019 found that 10 no. units have been completed.

Only 10 no. of the 1,750 no. units allocated to the Phase 1 lands up to 2016 have been delivered to date, which equates to a shortfall of 1,740 no. units.

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 in the north of Phase 1 cites potential traffic hazard on the Mount Avenue Road (Reg. Ref. 14/378 ABP Ref. PL15.244460). More recently, planning permission has been sought under Reg. Ref. 18943, ABP Ref. PL15 .303628, for 80 no. units and upgrade works to the Headford Junction and Mount Avenue however the Council's decision to grant permission for the proposal was appealed to the Board on the basis of traffic hazard.

It is of note that LIHAF funding has been awarded to upgrade c. 2 kilometres of the Mount Avenue Road to facilitate the development of 212 no. units in the Phase 1 lands up to 2021, and 1,200 overall. It is evident that even after the LIHALF upgrades the capacity of the Phase 1 lands still falls significantly short of the 1,750 no. unit allocation in the Dundalk & Environs Development Plan 2009-2015 and cannot accommodate the additional 1,600 units required up to 2021 under the Louth County Development Plan, or the circa 4,000 residential units required to reach the population targets of the RSES up to 2031.

To meet these housing allocations of the County Development Plan and the RSES additional residential lands outside of the Phase 1 lands at Mount Avenue need to be released for development.

3.2 Overall Planning History Dundalk and Environs

To inform this assessment a planning history review was undertaken of the Phase 1, 2 and 3 residential lands and 'Sites with Planning Permissions' identified in the Housing Survey of Variation No. 1 of the Dundalk & Environs Development Plan 2009. This review found that since the Housing Survey undertaken in 2010 just 390 no. new housing units have been permitted on lands outside the town centre, including the 156 no. recently permitted by the Board under ABP-303253-18, with the vast majority of current extant dwellings arising from planning permissions gained prior to 2010/2011.

The planning history review, summarised in Appendix A found that the 'Sites with Planning Permissions' highlighted in the Core Strategy accommodated 3,965 no. units, with the largest site at Haynestown/Marlmount accounting for 1,395 no. of those units. Many of these permissions have been amended and extended over the past 9 years such that these 'Committed' units currently account for circa 2,500 of the circa 2,900 extant units in the area at this time, see Table 3.2 below.

These 'Committed' units are already accounted for in the Core Strategies for the area, as discussed in Section 2 above, and the Dundalk & Environs Development Plan allocated an additional 1,750 no. units up to 2016 and the Louth County Development Plan allocated a further 1,600 no. units from 2016 to 2021. In total these Core Strategies allocated a total of 3,350 no. new units to Dundalk and Environs for development between

2010 and 2021. Between 2010 and 2019 only 390 no. new units have been permitted and thus there is an under-provision of 2,960 no. units to meet the Core Strategy Allocations up to 2021.

Table 3.2 Summary of Permitted Residential Units from Housing Survey 2010 up to April 2019, from Tables A2, A3, A4 and A5 in Appendix A.

Total Housing Target 2010 to 2021 is: 1,750 (2009 DTP) + 1,600 (2015 CDP) = 3,350 units					
Residential Lands	Phase 1	Phase 2	Phase 3	Other Lands	Total
Permitted Units 2010 Housing Survey	256 no. Units	2,140 no. Units	945 no. Units	624 no. Units	3,965 no. Units
Permitted Units at April 2019	67 no. Units	2,043 no. Units*	780 no. Units*	39 no. Units*	2,929 no. Units
		*1,737 were carried forward from 2010 through extension of duration and amendment permissions	*All carried forward from 2010 through extension of duration permissions	*22 carried forward from 2010 through amendment of permissions	
Units not previously allocated as 'Committed' in 2010 Housing Survey (Variation no. 1 to Town Plan).	67 no. Units	306 no. Units.	None	17 no. Units	390 no. Units
Under-provision of Units Discounting 2010 Committed Units					2,960 no.

3.3 Commencement Notices Dundalk and Environs

A review of the Building Control Management System (BCMS) sought to quantify the number of dwellings potentially constructed since the BCMS came into effect on 1 March 2014. The findings of this review are provided in Appendix B of this report and summarised in Table 3.3 below.

In total, commencement notices were found for 15 no. units in the Phase 1 lands, c. 453 no. units on Phase 2 lands, 148 no. units on Phase 3 lands and 34 no. units on other 'Committed Lands' between March 2014 and April 2019. In total, commencement notices were identified for c. 573 no. units across all Phase 1, Phase 2, Phase 3 and 'Committed' sites over the past 5 years. Of these commencement notices, there were just 97 no. new units that were not already 'Committed' in the 2010 housing survey, of which 15 no. occur on the Phase 1 lands, 48 no. are on Phase 2 lands and 34 no. are on other sites. Given that the 15 no. Phase 1 units with commencement notices were to meet the Phase 1 allocation of 1,750 no. up to 2016, it is submitted that the remaining 82 no. units with commencement notices are attributed to the 2016 to 2021 Housing Allocation

of 1,600 under the County Development Plan. **There is an under provision of 1,518 no. units with commencement notices to meet the Housing Allocation of the County Development Plan up to 2021.**

Table 3.3 Summary of Units in BCMS

Phases	No. Units with BCMS Commencement Notices
Phase 1	15 no. Units
Phase 2	c. 453 no. Units
Phase 3	148 no. Units
Other Lands	34 no. Units
Total Units on Phase 1, 2, 3 and other lands with BCMS Commencement Notices from 2014 up to 2019:	c. 573 no. Units
Units with BCMS Commencement Notices not previously allocated as 'Committed' in 2010 Housing Survey (Variation no. 1 to Town Plan)	c. 97 no. Units
Under-provision of Units Under CDP Housing Target of 1,600, Discounting 2010 Committed Units and Phase 1 units.	c. 1,518 no. Units

Committed Units on 'Sites with Planning Permission' at the time of Variation No. 1 have not been delivered at a sufficient pace to compensate for the lack of supply on other residential lands. Between March 2014 and April 2019 commencement notices for just 476 no. 'Committed' units were submitted to BCMS.

4 MATERIAL CONTRAVENTION

This current proposal seeks to provide 483 no. dwellings and a childcare facility on serviced Phase 3 lands that are zoned for residential development. The granting of permission for residential development at the subject site, or any Phase 2 of 3 residential lands, contravenes Policy CS2 of the Dundalk & Environs Development Plan 2009 notwithstanding that just 0.6% of the Phase 1 lands have been developed to date.

Under Section 5(6), the Planning and Development (Housing) and Residential Tenancies Act, 2016, the Board may grant planning permission for a proposed development that is considered to materially contravene the Development Plan, other than in relation to zoning, having regard to the requirements of Section 37(2)(b) of the Planning and Development Act 2000, as amended. The requirements of Section 37(2)(b) have been discussed in Sections 4.1 and 4.2 below.

4.1 Section 37(2)(b)(i) of the Planning and Development Act 2000, as amended: the proposed development is of strategic or national importance

With reference to the RSES and the National Planning Framework (NPF) it is submitted that the proposed residential development is of strategic importance.

The term 'Strategic Importance' is not expressly defined in the 2000 or 2016 Acts however, in exceeding 100 no. units on zoned residential lands the proposal accords with the definition for 'Strategic Housing Development' under these Acts, and can therefore be considered 'Strategic' for the purposes of Section 37(2)(b)(i). The importance of this Strategic Housing Development is derived from regional and national policies that underline the importance of Dundalk in the growth of the Region.

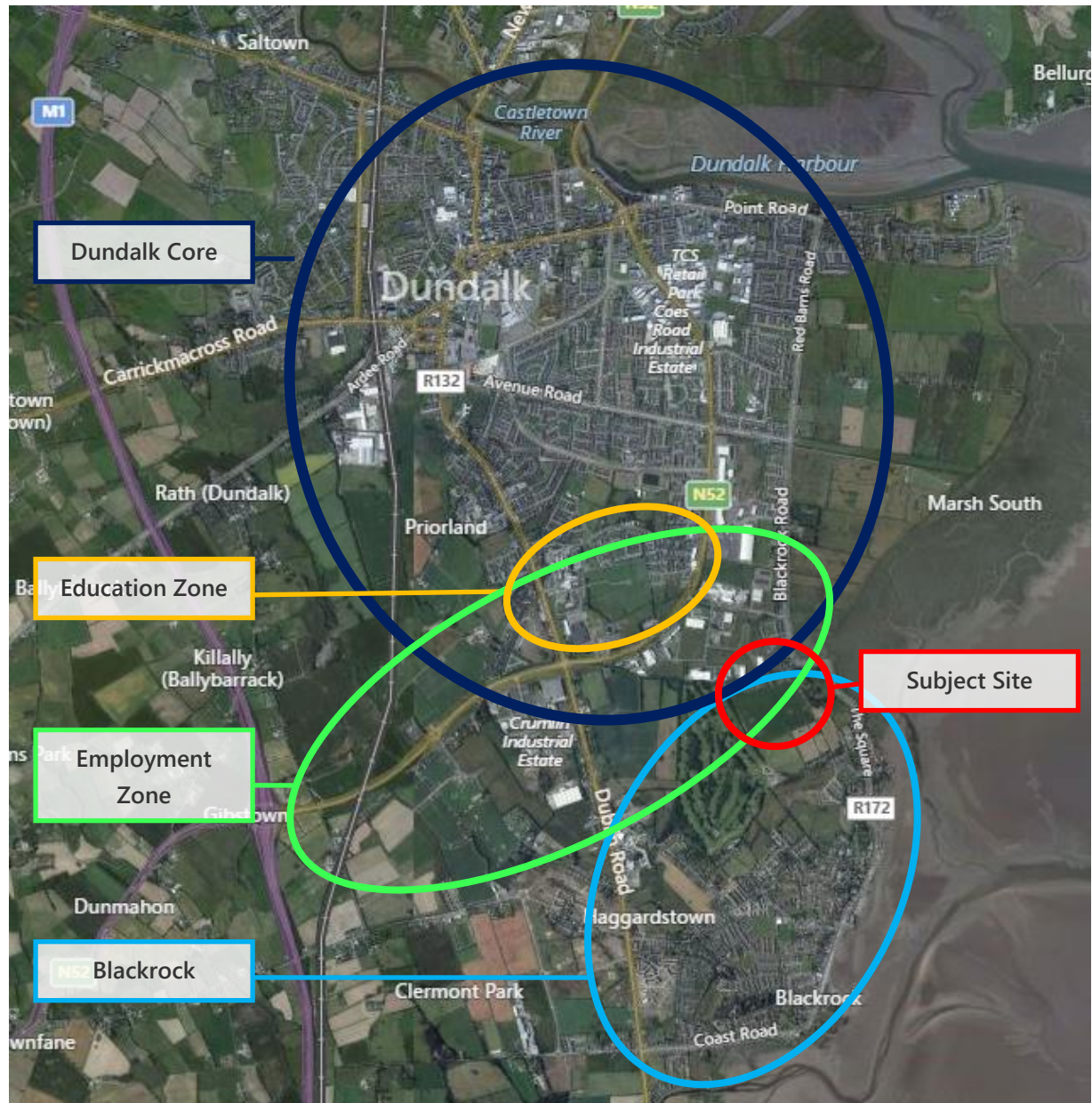
The NPF is the Government's high-level strategic plan for shaping the future growth and development of Ireland to the year 2040. As well as facilitating the preparation of the Spatial and Economic Strategies for each region, the NPF provides for a population target of between 490,000 and 540,000 additional people in the Eastern and Midland region. To achieve this growth the NPF requires the delivery of at least 30% of new homes within the urban footprint of targeted settlements outside the existing cities. The NPF prioritises Dundalk and Drogheda for growth and consolidation given their strategic location on the nationally important Dublin-Belfast Economic Corridor, and it is stated that key future planning and development and place-making policy priorities for the Eastern and Midland Region include:

"A focused approach to compact, sequential and sustainable development of the larger urban areas along the Dublin – Belfast economic and transport corridor, along which there are settlements with significant populations such as Dundalk and Drogheda".

The RSES acknowledges the strategic importance of Dundalk by designating the town as one of three Regional Growth Centres in the Eastern and Midland Region. The RSES provides for significant commercial and residential development in the Dundalk so that it will grow to a city scale with a population target of 50,000 by 2031. Using the 2016 population figures as a baseline, it is estimated that the population of Dundalk will need to increase by 11,000 people in order to reach this target, and an additional c. 4,000 new residential

units¹⁰ will be required to house these new residents. Applying an average residential density of 42 units per hectare, as used in the Louth County Development Plan, in excess of 90 hectares of residential lands will be required in Dundalk up to 2031 to meet the housing targets of the RSES.

Figure 4.1 Strategic Location of Site.



To aid the allocation of lands and the delivery of necessary housing units, the NPF provides for 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

¹⁰ Based on an occupancy rate of 2.7 persons per dwelling as used in Section 2.9.1 'Allocation of Population in the Settlement Hierarchy' of the Development Plan.

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 subject site constitutes Tier 1 'Serviced Zoned Land' and can accommodate sustainable residential development in accordance with the strategic objectives of the NPF and the RSES. Correspondence from Irish Water through the 'Confirmation of Feasibility' dated 18 February 2019 and the 'Statement of Design Acceptance' dated 20 May 2019 illustrate that the subject site and the proposed development can be serviced potable and wastewater infrastructure. Proposed surface water infrastructure will be provided within the site, with discharge to the existing surface water outfall to be kept within greenfield discharge limits, as designed by Project Engineers Finn Design Partnership. Existing footpaths on the Blackrock Road (R172) run northwards to Dundalk core and southwards to Blackrock, ensuring pedestrian connectivity. The Traffic & Transport Assessment prepared by WS Atkins International Limited 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. As is shown in Figure 4.1, the subject site is strategically located within the footprint of Dundalk, contiguous to the urban core and co-located within comfortable walking distance of existing employment, educational and recreational zones and services. As such, the site is strategically positioned to deliver housing in the short term.

The planning history analysis provided in Section 3 illustrates that Dundalk and Environs is currently underperforming in respect of its housing allocations under the Development Plans and has failed to deliver the quantum of new units required for planned and sustainable growth. Recent articles from local and regional newspapers indicate that there is a chronic under supply of housing in Dundalk to meet current demand, which is said to hamper economic investment and growth¹¹, and the County has experienced significant increases in Homelessness. Since July 2016 when the Government launched the '*Rebuilding Ireland – an Action Plan for Housing and Homelessness*' homelessness in County Louth as increased by 50%¹², and therefore urgent action is needed to build more homes in key settlements in the County.

It is submitted that the proposed development of 483 no. dwellings on Tier 1 'Serviced Zoned Land' will provide much needed housing in Dundalk as required under the RSES in accordance with the NPF and Pillar Three of the Action Plan for Housing and Homelessness, and is therefore of strategic importance for this Regional Growth Centre.

11. The Independent Regional. The Argus. (23 February 2019). <https://www.independent.ie/regionals/argus/news/housing-an-issue-in-bringing-new-employment-37827704.html>

The Independent Regional. The Argus. (7 April 2018). <https://www.independent.ie/regionals/argus/news/concern-over-homeless-rise-36766671.html>

Talk of the Town (28 February 2019) <https://www.talkofthetown.ie/homeless-figure-in-louth-jumps-by-almost-26-in-january/>

Talk of the Town (18 June 2018) <https://www.talkofthetown.ie/those-on-housing-waiting-list-in-louth-face-waiting-up-to-16-years-for-a-home-warns-breathnach/>

Irish Mirror (15 May 2018) <https://www.irishmirror.ie/news/irish-news/rising-rents-causing-homeless-fears-12536462>

12. The Department of Housing, Planning and Local Government Homelessness Report February 2019 found 150 no. homeless people in Louth, the same report from July 2016 found 76 no. homeless people in Louth.

4.2 Section 37(2)(b)(ii) of the Planning and Development Act 2000, as amended: there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned

Policy CS2 of Variation No. 1 to the Dundalk & Environs Development Plan 2009 conflicts with the development objectives for Dundalk described in the Louth County Development Plan 2015-2022, the RSES and the NPF. Policy CS2 seeks to reinforce the phasing designation and Core Strategy adopted in 2011 and states the following:

"To apply the phasing of new residential development as per the phasing strategy set out, whereby residential development, other than infill, brownfield or mixed use development shall only be permitted in the identified area within Phase 1. Only on completion of the development of 75% of these lands shall subsequent phasing be considered for additional residential development".

As detailed in Section 2, the Phase 1 lands designated under the Dundalk & Environs Development Plan 2009 comprise 50 hectares of land in the west of Dundalk that were to accommodate 1,750 no. dwellings up to 2016. To date only 10 no. houses have been delivered on the Phase 1 lands, representing an under provision of 1,740 no. units. Policy CS2 of the Plan has prevented the delivery of residential units on alternative zoned and serviced lands as just 0.6% of the Phase 1 lands have been developed to date. In this way, Policy CS2 is inconsistent with Strategic Objective SO2 of the Plan that seeks to;

*"Devise a settlement strategy that will guide **new development within the plan area** in accordance with principles of **sustainable development in order to improve the quality of life** of the inhabitants of Dundalk and County Louth". (emphasis added)*

Policy CS2 also conflicts with the Strategic Objectives of the Louth County Development Plan 2015-2022, including the overall Strategic Objectives to;

*"1. Realise the potential and promote the development and growth of County Louth through harnessing the economic and employment potential of the competitive advantages of the County. This includes its strategic location, connectivity and accessibility to external markets and **having regard in particular to the role of the Dundalk Gateway and Drogheda Primary Development Centre as catalysts for development within the region** and to forge strong economic links on a cross border basis with Northern Ireland and adjoining counties in a sustainable manner.*

*2. Direct **new development in accordance with the Settlement Hierarchy** which will provide for the **sustainable development of the County for the period 2015-2021 and beyond**". (emphasis added)*

Under the County Plan, Dundalk is designated as a Large Growth Town 1 on the top of the Settlement Hierarchy and is allocated an additional 1,600 housing units between 2016 and 2021 to accommodate a target population increase of 4,322 persons during this time. It is stated in the Core Strategy and Settlement Strategy that an additional 57 hectares of Housing Land will be required in Dundalk and Environs between 2016 and 2021. The Dundalk & Environs Development Plan 2009 has not been varied to incorporate the Core Strategy allocations of the County Plan and Policy CS2 is preventing the release of the lands beyond the 2016 horizon. In this way, Policy CS2 is impeding the planned development and population growth of Dundalk and is inconsistent with the objectives of the overarching County Development Plan.

While they are not strictly Development Plans, it is of note that Policy CS2 conflicts with the policies and objectives of the RSES and the NPF that both support and require significant growth in Dundalk.

The NPF seeks to grow the Eastern and Midland region by circa 500,000 people up to 2040 and targets development of existing settlements outside of the Capital. The NPF specifically references the regional role of Dundalk and accordingly the RSES prescribes a target population for Dundalk 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 term¹³. Policy CS2 does not facilitate growth beyond the 2016 housing allocations and conflicts with the significant growth targets attributed to Dundalk under the NPF and RSES.

Both the NPF and the RSES advocate proactive land management to secure the delivery of targeted growth. The NPF describes a methodology for the prioritisation of Tier 1 'Serviced Zoned Lands' that have reasonable certainty of delivering development. In addition, Section 4.3 of the RSES states that development sites should not be 'reserved' at the land allocation stages of development plans as would "...create an unreasonable dependency on such sites being brought forward or that would impede the bringing forward of other suitable lands with better prospects for delivery in the short term...". It is submitted that Policy CS2 conflicts with the NPF and the RSES by creating undue dependency on constrained lands in a manner that is impeding development of Tier 1 'Serviced Zoned Lands' that can deliver housing units in the short term, such as the subject site.

It is submitted that Policy CS2 of the Dundalk & Environs Development Plan 2009 conflicts with settlement and core strategy objectives of that Plan and the Louth County Development Plan 2015 and is inconsistent with the current regional and national policies. It is evident that the Phase 1 lands have not, and cannot, deliver development at the quantum and rate required under the County Plan or the RSES and therefore Policy CS2 conflicts with the objectives for the sustainable growth of Dundalk.

¹³ In the 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.

5 CONCLUSIONS

This statement seeks to address matters that maybe considered to materially contravention of the Development Plan, in accordance with Section 8 (1)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

With regard to the requirements of Section 37(2)(b) of the Act of 2000, it is considered that this proposed Strategic Housing Development of 483 no. homes and a creche on Tier 1 'Serviced Zoned Land' is of strategic importance. It is also considered that there are conflicting objectives in the Development Plans insofar as the proposed development is concerned. These matters are summarised as follows:

- **Core Strategy:** Variation no. 1 of the Dundalk & Environs Development Plan 2009-2015 described the housing allocation for Dundalk up to 2016 and divided the existing residential lands into three phases on this basis. The designated Phase 1 lands at Mount Avenue were to deliver 1,750 units to 2016, and Policy CS2 only provides for the development outside of Phase 1 once 75% of these allocated units are delivered. The Louth County Development Plan 2015 allocates a further 1,600 units on 57 hectares for housing development in Dundalk between 2016 and 2021. The additional housing allocation from the CDP is not provided for in the Dundalk & Environs Development Plan and the delivery of housing units to meet this allocation is prevented by Policy CS2.
- **Development on Phase 1 Lands:** The 50-hectare Phase 1 lands have delivered 10 houses between 2010 and 2019. This represents an under provision of 1,740 units when compared to the Core Strategy housing allocation for those lands. Recent applications indicate that infrastructural constraints are preventing the delivery of homes on the Phase 1 lands. LIHALF funding has been awarded to realise development in this area however it is stated that the lands only have capacity to deliver 212 dwellings up to 2021 and 1,200 overall, which is substantially below the housing allocation for these lands.
- **Overall Residential Development:** The restrictive nature of Policy CS2 has prevented the development of unconstrained Phase 2 or 3 residential lands and has limited the delivery of housing to sites that already held planning permission during the 2010 Housing Survey such that approximately 2,500 of the circa 2,700 extant housing units in Dundalk pre-date 2010. In total, only 390 no. new 'uncommitted' residential units have been permitted on residential lands between 2010 and 2019, including the 158 no. units permitted on Phase 2 lands under the SHD process on the 2 April 2019. This represents an under provision of 2,960 no. units when compared to the housing allocation of 1,750 units up to 2016 and 1,600 units up to 2021. The BCMS contains commencement notices for approximately 97 'new' residential units between March 2014 and April 2019, of which 15 are located on the Phase 1 lands, 48 are on Phase 2 lands and 34 are on other sites.
- **Strategic Importance:** The subject site is Tier 1 'Serviced Zoned Land' as defined in the NPF, as evidenced by correspondence from Irish Water, and assessments undertaken by Project Engineers. The site is strategically located relative to the established employment nodes and the Dundalk Institute of Technology and as such is well located contiguous to the urban core *'to support growth, innovation and the efficient provision of infrastructure,'* as advocated in the NPF. The NPF prioritises the growth of Dundalk and the RSES accordingly designates the site as a Regional Growth Centre with a population target of 50,000 by 2031. From the 2016 census figures, this population target would see Dundalk grow by circa 11,000 people, which equates to a housing allocation of circa 4,000 new units. The NPF advocates the prioritisation of unconstrained Tier 1 'Serviced Zoned Land', such as the subject site, to meet strategic

these housing allocations and to deliver houses. Upwards trends in homelessness in County Louth and chronic housing shortages undermine the planned economic and residential growth of Dundalk and therefore this proposed development is of strategic importance to this Regional Growth Centre.

- **Conflicting Objectives:** Policy CS2 of Variation No. 1 to the Dundalk & Environs Development Plan 2009 conflicts with the development objectives for Dundalk described in the Dundalk & Environs Development Plan 2009 and the Louth County Development Plan 2015-2022, and the regional and national objectives of the RSES and the NPF. Strategic Objective SO2 of the Town Plan and the Strategic Objectives of the County Plan all provide for the delivery of new development and the sustainable development of Dundalk and County Louth while Policy CS2 restricts development in the town as just 0.6% of the Phase 1 lands have been delivered to date. Equally, Policy CS2 does not account for the additional 1,600 no. units allocated to Dundalk for delivery between 2016 and 2021 and does not facilitate the significant population growth provided for in the RSES and the NPF. Policy CS2 and the Core Strategy of the Dundalk & Environs Development Plan 2009 is inconsistent with the land management objectives of the NPF and RSES, which prioritise the release of Tier 1 'Serviced Zoned Land' with the ability to deliver housing in the short term.

It is submitted that the proposed development is consistent with the planned and sustainable development of Dundalk and is consistent with the Dundalk & Environs Development Plan, the Louth County Development Plan 2015 and the relevant Section 28 Ministerial Guidelines, as set out in the Planning Report & Statement of Consistency submitted with this application. The proposed development will not undermine the eventual delivery of housing on the Phase 1 lands, which are on the opposite side of Dundalk and have a total stated capacity for just 212 units up to 2021 and 1,200 units overall. Given the scale of growth anticipated under the RSES, at approximately 4,000 units up to 2031, it is submitted that the proposed development of Tier 1 'Serviced Zoned Lands' will support the compact development of Dundalk to a city scale and provide much needed housing in the short term.

APPENDIX A

REVIEW OF PERMITTED RESIDENTIAL UNITS FROM HOUSING SURVEY 2010 UP TO APRIL 2019

Table A1. Summary of Permitted Residential Units from Housing Survey 2010 up to April 2019, from Tables A2, A3, A4 and A5 below.

Total Housing Target 2010 to 2021 is: 1,750 (2009 DTP) + 1,600 (2015 CDP) = 3,350 units					
Residential Lands	Phase 1	Phase 2	Phase 3	Other Lands	Total
Permitted Units 2010 Housing Survey	256 no. Units	2,140 no. Units	945 no. Units	624 no. Units	3,965 no. Units
Permitted Units at April 2019	67 no. Units	2,043 no. Units*	780 no. Units*	39 no. Units*	2,929 no. Units
		*1,737 were carried forward from 2010 through extension of duration and amendment permissions	*All carried forward from 2010 through extension of duration permissions	*22 carried forward from 2010 through amendment of permissions	
Units not previously allocated as 'Committed' in 2010 Housing Survey (Variation no. 1 to Town Plan).	67 no. Units	306 no. Units.	None	17 no. Units	390 no. Units
Under-provision of Units Discounting 2010 Committed Units					2,960 no.

Table A2. Planning History of all Phase 1 Lands.

Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Lis Na Dara, Mount Avenue/ Castletown	Reg. Ref. 05/344 (259 no. Units permitted: 97 no. Complete)	164 Units (Expired 07.06.2011)	Reg. Ref. 14520049 To Complete Lis Na Dara.	67 no. units (Expires 07.12.2019: 10 no. complete)	67 no. Units
	Reg. Ref. 08/060 (92 no. permitted: None Complete)	92 Units (Expired 16.10.2013)			
Total Permitted Dwellings Housing Survey 2010:					256 no. Units
Total Permitted Dwellings as of April 2019:					67 no. Units
Extant Units not previously allocated as 'Committed' in 2010 housing Survey:					67 no. Units
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Farnreg, Mount Avenue and Headford , Dundalk	None	None	Reg. Ref. 18943 80 no. units and Infrastructure (On Appeal)	(On Appeal)	None
	None	None			
Total Permitted Dwellings Housing Survey 2010:					None
Total Permitted Dwellings as of April 2019:					None

Table A3. Planning History of all Phase 2 Lands.

Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Racecourse Road.	Reg. Ref. 06/399 (149 no. units Permitted: 27 Complete)	122 no. Units (Extended)	Reg. Ref. 12520067 Extend Reg. Ref. 06/399	122 no. Units (stated as remaining in Housing Survey)	
	Reg. Ref. 07520321 Amend Houses	-	Reg. Ref. 17661 Extend Reg. Ref. 06/399	122 no. Units (as above.)	122 No. Units (Expires 31.12.2021)
	Reg. Ref. 10520033 Amend Houses	-			
	Permitted Dwellings Housing Survey 2010: 122 no. Units				
	Permitted Dwellings as of April 2019: 122 no. Units				
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Lismullen Grove, Armagh Road.	05/354	143 No. Units (expired 30.10.2011)	Reg. Ref. 14234	23 no. Units	23 no. Units (Expires 18.12.2019)
	Permitted Dwellings Housing Survey 2010: 143 no. Units				
	Permitted Dwellings as of April 2019: 23 no. Units				
	Extant Units not previously allocated as 'Committed' in 2010 housing Survey: 23 no. Units				
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Coulter Place, Armagh Road	None Stated in Housing Survey	None Stated in Housing Survey	Reg. Ref. 10520047	Complete 22 no, Units 84 no. Units	None
	Reg. Ref. 05/22 (132 no. Units Permitted)	Expired 11.08.2010	Reg. Ref. 14352 To Extend Reg. Ref. 10520047 above.	Complete 22 no, Units 84 no. Units (Expires 25.07.2020)	106 no. Units
	Reg. Ref. 05/294 Amend Creche	Expired 11.08.2010	Reg. Ref. 15755	-	-
	Reg. Ref. 05/322 Amend House Types	Expired 11.08.2010	Reg. Ref. 17705	1 no. fewer unit	1 no. fewer unit
	Reg. Ref. 06/39 Amend House Types	Expired 11.08.2010			
	Reg. Ref. 06/100 Amend House Types and replace 22 no, Units with 20	Expired 11.08.2010			
	Permitted Dwellings Housing Survey 2010: None Stated				
Permitted Dwellings as of April 2019: 106 no. Max. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: 84 No. Units					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019

Carlinn Hall, Mullagharlinn Road,	Reg. Ref. 04/1451 (298 no. units)	270 no. Units (Extended)	Reg. Ref. 09863 Replace 21 no, units with Nursing Home	-	-
	Reg. Ref. 08/722 (1 no. Unit)	1 no. Unit (14.09.2013)	Reg. Ref. 10571 Revise Layout	-	-
			Reg. Ref. 1275 Extend Reg. Ref. 04/1451	270 no. Units (Expired 10.06.2016)	-
			Reg. Ref. 13265 Amend Reg. Ref. 04/1451	2 no. Units (Expired 10.06.2016)	-
			Reg. Ref. 13524 Amend Reg. Ref. 04/1451	11 no. units in lieu of 22 no. (Expired 10.06.2016)	-
			Reg. Ref. 14368 Amend Reg. Ref. 04/1451	3 no. units in lieu of 5 no. (Expired 10.06.2016)	-
			Reg. Ref. 14534 Amend Reg. Ref. 04/1451	29 no. units in lieu of 42 no. (Expired 10.06.2016)	-
			Reg. Ref. 15212	42 no. Units (Expired 23.08.2018)	-
			Reg. Ref. 15566 Amend Reg. Ref. 04/1451	-	-
			Reg. Ref. 15772 Amend Reg. Ref. 04/1451	Reduce by 1 no., Unit. (Expired 10.06.2016)	-
			Reg. Ref. 1612 Amend Reg. Ref. 15212	1 no. Unit (Expired 23.08.2018)	-
			Reg. Ref. 1661 Amend Reg. Ref. 04/1451, 1275 and 15212	56 no. Units (extended)	-
			Reg. Ref. 17225	17 no. Units (expires 11.06.2022)	17 no.
			Reg. Ref. 17232	9 no. Units (expires 29.01.2022)	9 no.
			Reg. Ref. 18231 Extend Reg. Ref. 16/61	56 no. Units (expires 22.02.2020)	56 no.
	Permitted Dwellings Housing Survey 2010: 271 no. Units				
Permitted Dwellings as of April 2019: c. 82 no. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: 26 no. Units					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Haggardstown/	Reg. Ref. 03/1754	1,392 no. Units	Reg. Ref. 1591	1,392 no. Units	1,392 no. Units

Haynestown, (Groveview Builders Ltd)			Extend Reg. Ref. 03/1754	(Expires 20.04.2020)	
	Reg. Ref. 0663 Amend Reg. Ref. 03/1754	-	Reg. Ref. 1597 Extend Reg. Ref. 081309	257 no. units in lieu of 285 no. units	257 no. units in lieu of 285 no. units
	Reg. Ref. 061075 (Alternative Design)	318 no. Units	Reg. Ref. 15/808 Amend Reg. Ref. 061075	-	-
	Reg. Ref. 061307 Amend Reg. Ref. 03/1754 and 0663	-	Reg. Ref. 16/11 Revise layout of Reg. Refs. 061075 & 080832	-	-
	Reg. Ref. 071560 Amend Reg. Ref. 03/1754	-	Reg. Ref. 16/51 Amend Reg. Ref. 061075	-	-
	Reg. Ref. 08/832 Amend Layout	1 no. Unit	Reg. Ref. 16388 Amend House Design	-	-
	Reg. Ref. 08/1032 Revised layout	-	Reg. Ref. 16389 Amend House Design	-	-
	Reg. Ref. 081309 Amend Reg. Ref. 03/1754	257 no. units in lieu of 285 no. units	Reg. Ref. 16584 Amend Reg. Ref. 03/1754	53 no. units in lieu of 57 no.	53 no. units in lieu of 57 no.
			Reg. Ref. 18104 Amend Reg. Ref. 03/1754, 06/1075, and 15/91	-	-
	Permitted Dwellings Housing Survey 2010: 1,392 no. Units				
Permitted Dwellings as of April 2019: 1,392 no. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
St Judes, Dublin Road, Haynestown	Reg. Ref. 07899 3 no. Unit. Not Included in Housing Survey (Expired 28.10.2012)	None	Reg. Ref. 17900	3 no. Units	3 no. Units
Permitted Dwellings Housing Survey 2010: None Stated					
Permitted Dwellings as of April 2019: 3 no. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: 3 no. Units					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Arva Lane, Cocklehill,, Blackrock	Reg. Ref. 09/510 2 no. Units Not Included in Housing Survey (Expired 02.12.2014)	None	Reg. Ref. 10498	2 no. Units (Expired 30.03.2016)	-
			Reg. Ref. 11/351	1 no. Unit (Expired 21.12.2016)	-
Permitted Dwellings Housing Survey 2010: None Stated					
Permitted Dwellings as of April 2019: None					

Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Seafield Road, Blackrock,	Reg. Ref. 0656 (Withdrawn)	67 no. Units (Stated as extant but application withdrawn)	Reg. Ref. 10212	90 no. units (Expired 18.08.2015)	-
Permitted Dwellings Housing Survey 2010: 67 no. Units					
Permitted Dwellings as of April 2019: None					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Hamilton, Rock Road, Blackrock,	Reg. Ref. 08240 54 no. Units Not Included in Housing Survey (Expired 28.08.2013)	None	Reg. Ref. 12439 Extend Reg. Ref. 08/240	54 no. Units (Expired 28.08.2018)	-
			Reg. Ref. 13112 Amend Reg. Refs 08/240 & 12/439.	24 no. Units in Lieu of 54 no. (Expired 28.08.2018)	-
			Reg. Ref. 1747 12 no. Units	12 no. Units (Expires 09.07.2022)	12 no. Units
			Reg. Ref. 18288 Amend Reg. Ref. 1747	-	-
	Total Permitted Dwellings Housing Survey 2010: None Stated				
Total Permitted Dwellings as of April 2019: 12 no. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: 12 no. Units					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Blackrock Cove, Golf Links Road, Haggardstown, Blackrock	Reg. Ref. 08/650 (145 no. Units)	145 No. Units (Extended)	Reg. Ref 13379 Extend Reg. Ref. 08/650	145 No. Units (Expires 13.04.2019. Further Extension lodged but decision not made)	145 no. Units
			Reg. Ref. 14450 Amend Reg. Ref. 08/650	125 no. Units in Lieu of 145 no.	
			Reg. Ref. 15658 Amend Reg. Ref. 14450	-	
			Reg. Ref. 16151 Amend Reg. Ref. 14450		
			Reg. Ref. 16363 Amend Reg. Ref. 14450		
			Reg. Ref. 16618 Amend Reg. Ref. 14450		

			Reg. Ref. 16926 Amend Reg. Ref. 14450	4 no. Units	4 no. Units
			Reg. Ref. 17784 Amend 08/650, 13/379, 14/450 & 15/658	8 no. Units	8 no. Units
			Reg. Ref. 18573 Amend Reg. Refs. 14/450 and 16/363	-	
Total Permitted Dwellings Housing Survey 2010: 145 no. Units					
Total Permitted Dwellings as of April 2019: 145 no. Max. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Old Golf Links Road and Tuite's Lane, Blackrock	None	None	Reg. Ref. ABP-303253-18	158 no. Units	158 no. Units
Permitted Dwellings Housing Survey 2010: None					
Permitted Dwellings as of April 2019: 158 no. Units					

Table A4. Planning History of all Phase 3 Lands.

Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Armagh Road	Reg. Ref. 08520189 (392 no. Units Permitted)	392 no. Units (10 year permission)	Reg. Ref. 181060 (Extend Reg. Ref. 081013)	83 no. (extended)	83 no.
	Reg. Ref. 081013 (83 no. units permitted)	Not Shown in Housing Survey	Reg. Ref. 181061 (Extend Reg. Ref. 08520189)	392 no. (extended)	392 no.
	Total Permitted Dwellings Housing Survey 2010: 392 no. Units				
	Total Permitted Dwellings as of April 2019: 475 no.				
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Lis Na Dara (Phase 3)	Reg. Ref. 08/60 (92 no. Units)	92 no. Units	None	None	None
Total Permitted Dwellings Housing Survey 2010: 92 no. Units					
Total Permitted Dwellings as of April 2019: None					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Mounthamilton, Carrickmacross Road, Ardee Road	Reg. Ref. 07520013 (179 no. Units Permitted)	179 no. (Extended)	Reg. Ref. 12520015 (Extend Reg. Ref. 07520013)	179 no. (Extended)	179 no. units
	Reg. Ref. 07520315 (Amend Permitted)	6 no. dwellings in Lieu of 12	Reg. Ref. 12520066 (Extend Reg. Ref. 07520315)	6 no. dwellings in Lieu of 12 (Expired 10.02.2018)	-
	-	-	Reg. Ref. 16684 (Vary Reg. Ref.	18 no. dwellings in lieu of 31	-

			07520013)	(Expired 10.02.2018)	
	-	-	Reg. Ref. 17414 (Vary parent)	20 no. apartments in Lieu of 23 no. (20.08.2022)	3 no, fewer units
			Reg. Ref. 17662 (Extend Reg. Ref. 07520013)	179 no. (31.12.2021)	179 no. Units
			Reg. Ref. 17867	48 no. units in lieu of 55 no. units (31.12.2021)	7 no. fewer units
Total Permitted Dwellings Housing Survey 2010: 179 no. Maximum Units					
Total Permitted Dwellings as of April 2019: 179 no. Maximum Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Priorland, Area P1. Dublin Road	Reg. Ref. 07520214	143 no. Units (expired May 2014)	None	None	-
Total Permitted Dwellings Housing Survey 2010: 143 no. Units					
Total Permitted Dwellings as of April 2019: None					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Belfield Dublin Road, Haggardstown.	Reg. Ref. 06/900 (150 No. Units)	139 No.	Reg. Ref. 15296 Extend Reg. Ref. 09813	126 no. Units (Expires 24.06.2020)	126 no. Units
	Reg. Ref. 09813 (126 no. Units)	126 no. Units (Extended)	Reg. Ref. 1624 Amend Reg. Ref. 15296	-	-
Total Permitted Dwellings Housing Survey 2010: 139 no. Units					
Total Permitted Dwellings as of April 2019: 126 no. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					

**Table A5. Planning History of other 'Committed' Lands in Variation No. 1 of Dundalk and Environs
Development Plan 2009**

Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Carnbeg Golf Club (Zoned for Tourism and Leisure)	Reg. Ref. 0693 (448 no. Units Permitted)	448 no. Units (Extended)	Reg. Ref. 12548 (Extend 08/171)	- (Expired 11.05.2018)	-
	Reg. Ref. 08171 (amend roads)	-	Reg. Ref. 12549 (Extend 06/93)	448 no. Units (expired 03.01.2018)	None
	Total Permitted Dwellings Housing Survey 2010: 448 no. Units				
	Total Permitted Dwellings as of April 2019: None				
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Knockshee, Old Golf Links Road Blackrock (Zoned Retail, Leisure, recreation and community)	Reg. Ref. 06753 (83 no. Units)	71 no. Units (Extended)	Reg. Ref. 1043 Amend Reg. Ref. 06753	Creche in lieu of 6 no. units	-
	Reg. Ref. 061786 Amend Reg. Ref. 06753	-	Reg. Ref. 1133 Extend Reg. Ref. 06753	71 no. Units (Expires 19.12.2016)	-
	Reg. Ref. 07/139 Amend Reg. Ref. 06753	3 no. Units	Reg. Ref. 11139 Extend Reg. Ref. 06/1786	-	-
			Reg. Ref. 14191 Complete 6 no. Units of Reg. Ref. 07/1329	6 no. Units (Expires 17.08.2019)	6 no. Units
			Reg. Ref. 15489 17 no. Units	17 no. Units (Expires May 2021)	17 no. Units
Total Permitted Dwellings Housing Survey 2010: 71 no. Units					
Total Permitted Dwellings as of April 2019: 23 No. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: 17 no. Units					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Old Golf Links Road, Blackrock (Zoned Retail, Leisure, recreation and community, and Residential Unphased)	Reg. Ref. 04/1430 & Reg. Ref. 05/1518 (referred to together in Housing Survey)	105 no. Units	Reg. Ref. 1443 Extend Reg. Ref. 08/886	16 no. Units (Expires 17.05.2019)	16 no. Units
	Reg. Ref. 06/1422 Amend Layout Reg. Ref. 05/1518	-			
	Reg. Ref. 07195 Amend Layout Reg. Ref. 05/1518	-			
	Reg. Ref. 08886 Amend Reg. Ref. 05/1518	16 no. units in Lieu of 83 no. Units			
	Reg. Ref. 09249 Amend Reg. Ref. 05/1518 and	-			

	06/1422				
Total Permitted Dwellings Housing Survey 2010: 105 no. Units					
Total Permitted Dwellings as of April 2019: 16 no. Units					
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Fairways Hotel, Dublin Road/ Old Golf Links Road, Blackrock (Zoned Retail, Leisure, recreation and community)	Reg. Ref. 071247 (93 no. Units)	Not Stated in Housing Survey	Reg. Ref. 12149 Extend Reg. Ref. 071247	93 no. Units (Expired 17.01.2018)	None
	Total Permitted Dwellings Housing Survey 2010: Not Stated				
	Total Permitted Dwellings as of April 2019: None				
	Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None				
Location	Planning History Stated in Housing Survey 2010	Extant Dwelling Units in 2010 Housing Survey	Planning History Since 2010 Housing Survey	Units Permitted Since 2010 Housing Survey	Extant Dwellings 2019
Cois Farrage (Residential 1. Unphased)	Reg. Ref. 05/1061 (43 no. Units)	Complete	None	None	None
	Reg. Ref. 06476 Amend House Types	-			
	Total Permitted Dwellings Housing Survey 2010: None				
	Total Permitted Dwellings as of April 2019: None				
Extant Units not previously allocated as 'Committed' in 2010 housing Survey: None					

APPENDIX B

REVIEW OF BUILDING CONTROL MANAGEMENT SYSTEM (BCMS)

Table B1. Summary of Units in BCMS

Phases	No. Units with BCMS Commencement Notices
Phase 1	15 no. Units
Phase 2	c. 453 no. Units
Phase 3	148 no. Units
Other Lands	34 no. Units
Total Units on Phase 1, 2, 3 and other lands with BCMS Commencement Notices from 2014 up to April 2019:	c. 573 no. Units
Units with BCMS Commencement Notices not previously allocated as 'Committed' in 2010 Housing Survey (Variation no. 1 to Town Plan)	c. 97 no. Units
Under-provision of Units Under CDP Housing Target of 1,600, Discounting 2010 Committed Units and Phase 1 units.	c. 1,518 no. Units

Table B2. Phase 1 Lands: Commencement Notices Submitted on BCMS System 2014 to April 2019

Location	Planning History	Commencement Notices BCMS 2014 to Present
Lis Na Dara, Mount Avenue/ Castletown	Reg. Ref. 05/344 (259 no. Units permitted: 97 no. Complete)	None Found
	Reg. Ref. 08/060 (92 no. permitted: None Complete)	None Found
	Reg. Ref. 14520049 (67 no. Units to Complete Lis Na Dara)	<ul style="list-style-type: none"> • 14 no, Units and 1 no. partially constructed Unit for commencement 27/11/2017. • 14 no, Units and 1 no. partially constructed Unit for commencement 27.11.2017. • 14 no, Units and 1 no. partially constructed Unit for commencement 24.07.2017. <p>(It is assumed that these notices are for the same 15 no. units, given that the description for all three notices is the identical)</p>
Total Units with BCMS Commencement Notices in Phase 1: 15 no. Units		
Total No. Non-'Committed' Units with BCMS Commencement Notices in Phase 1 Lands: 15 no. Units		
Site Visit April 2019 indicates 10 no. Constructed		

Table B3. Phase 2 Lands: Commencement Notices Submitted on BCMS System 2014 to April 2019

Location	Planning History	Commencement Notices BCMS 2014 to Present
Racecourse Road.	Reg. Ref. 06/399 (149 no. units Permitted: 27 Complete)	None Found
	Reg. Ref. 07520321	None Found
	Reg. Ref. 10520033	None Found
	Reg. Ref. 12520067	None Found
	Reg. Ref. 17661	None Found
No. Units with Commencement Notices on BCMS: None Found		
Lismullen Grove, Armagh Road	Reg. Ref. 05/354 (143 No. Units)	None Found
	Reg. Ref. 14234 (23 no. Units)	None Found
No. Units with Commencement Notices on BCMS: None Found		
Coulter Place, Armagh Road (Lands not 'Committed' in Housing Survey 2010)	Reg. Ref. 05/22 (132 no. Units)	None Found
	Reg. Ref. 05/322	None Found
	Reg. Ref. 06/39	None Found
	Reg. Ref. 06/100	None Found
	Reg. Ref. 10520047	None Found
	Reg. Ref. 14352	None Found
	Reg. Ref. 17705	<ul style="list-style-type: none"> • 22 no. Units for commencement 04.04.2016. • 10 no. Units for commencement 05.02.2018
No. Units with Commencement Notices on BCMS: 32 No. Units		
Carlinn Hall, Mullagharlinn Road,	Reg. Ref. 04/1451 (298 no. units)	None Found
	Reg. Ref. 08/722 (1 no. Unit)	None Found
	Reg. Ref. 09863	None Found
	Reg. Ref. 10571	None Found
	Reg. Ref. 1275	<ul style="list-style-type: none"> • 21 no. Units for commencement 30.04.2015
	Reg. Ref. 13265	None Found
	Reg. Ref. 13524	<ul style="list-style-type: none"> • 2 no. Units for commencement 25.08.2014 • 7 no. Units for commencement 05.07.2014 • 2 no. Units for commencement 30.06.2014
	Reg. Ref. 14368	<ul style="list-style-type: none"> • 5 no. Units for commencement 17.12.2014
	Reg. Ref. 14534	None Found
	Reg. Ref. 15212	<ul style="list-style-type: none"> • 9 no. Units for commencement 02.01.2018
	Reg. Ref. 15566	None Found
	Reg. Ref. 15772	<ul style="list-style-type: none"> • 7 no. Units for commencement 08.03.2016
	Reg. Ref. 1612	<ul style="list-style-type: none"> • 8 no. Units for commencement 17.06.2016 • Boiler House for commencement 16.06.2016
	Reg. Ref. 1661	<ul style="list-style-type: none"> • 7 no. units for commencement 20.06.2018 • 6 no. units for commencement 13.03.2018 • 4 no, units for commencement 02.01.2018 • 21 no. units for commencement 30.01.2017 • 1 no. unit for commencement 16.11.2016 • 1 no, unit for commencement 15.11.2016 • 18 no. units for commencement 06.09.2016

	Reg. Ref. 17225 (17 no. Units)	<ul style="list-style-type: none"> • 10 no. units for commencement 22.05.2018 • 7 no. units for commencement 26.04.2018
	Reg. Ref. 17232 (9 no. Units)	<ul style="list-style-type: none"> • 9 no. units for commencement 20.06.2018
	Reg. Ref. 18231 (Extend Reg. Ref. 16/61)	None Found
No. Units with Commencement Notices on BCMS: 145 no. Units		
Haggardstown/ Haynestown (Groveview Builders)	Reg. Ref. 03/1754	None Found
	Reg. Ref. 0663	None Found
	Reg. Ref. 061075	None Found
	Reg. Ref. 061307	None Found
	Reg. Ref. 071560	None Found
	Reg. Ref. 08/832	None Found
	Reg. Ref. 08/1032	None Found
	Reg. Ref. 081309	None Found
	Reg. Ref. 1591	<ul style="list-style-type: none"> • 10 no. units for commencement 11.09.2018 • 10 no. units for commencement 03.09.2018 • 120 no. units for commencement 29.08.2018
	Reg. Ref. 1597	None Found
	Reg. Ref. 15/808	<ul style="list-style-type: none"> • 1 no. units for commencement 11.05.2016
	Reg. Ref. 16/11	None Found
	Reg. Ref. 16/51	None Found
	Reg. Ref. 16388	None Found
	Reg. Ref. 16389	<ul style="list-style-type: none"> • 4 no. units for commencement 25.01.2018 • 4 no. units for commencement 21.06.2017
Reg. Ref. 16584	<ul style="list-style-type: none"> • 10 no. units for commencement 21.06.2017 	
Reg. Ref. 18104	None Found	
No. Units with Commencement Notices on BCMS: 159 no. Units		
St Judes, Dublin Road, Haynestown	Reg. Ref. 07899	None Found
	Reg. Ref. 17900 (3 no. Units)	None Found
No. Units with Commencement Notices on BCMS: None Found		
Arva Lane, Cocklehill,, Blackrock	Reg. Ref. 09/510 (2 no. Units)	None Found
	Reg. Ref. 10498 (2 no. Units)	None Found
	Reg. Ref. 11/351 (1 no. Unit)	None Found
No. Units with Commencement Notices on BCMS: None Found		
Seafield Road, Blackrock	Reg. Ref. 0656	None Found
	Reg. Ref. 10212 (90 no. Units)	None Found
No. Units with Commencement Notices on BCMS: None Found		
Hamilton, Rock Road, Blackrock	Reg. Ref. 08240 (54 no. Units)	None Found
	Reg. Ref. 12439	None Found
	Reg. Ref. 13112	<ul style="list-style-type: none"> • Site Development works for commencement 10.06.2016.
	Reg. Ref. 1747 (12 no. Units)	<ul style="list-style-type: none"> • Residential development for commencement 12.02.2018
	Reg. Ref. 18288	None Found
No. Units with Commencement Notices on BCMS: No. Units not Stated		
Blackrock Cove, Golf Links Road ,	Reg. Ref. 08/650	None Found

Haggardstown, Blackrock	(145 no. Units)	
	Reg. Ref. 13379	None Found
	Reg. Ref. 14450	<ul style="list-style-type: none"> • 14 no. units for commencement 19.04.2017 • 3 no. units for commencement 27.02.2017 • 8 no. units for commencement 24.06.2016 • 8 no. units for commencement 18.09.2015
	Reg. Ref. 15658	<ul style="list-style-type: none"> • 7 no. units for commencement 23.05.2018 • 1 no. unit for commencement 03.07.2017 • 1 no. unit for commencement 03.07.2017
	Reg. Ref. 16151	None Found
	Reg. Ref. 16363	<ul style="list-style-type: none"> • 7 no. units for commencement 23.05.2018 • 14 no. units for commencement 19.04.2017
	Reg. Ref. 16618	None Found
	Reg. Ref. 16926	<ul style="list-style-type: none"> • 21 no. units for commencement 28.08.2017 • 7 no. units for commencement 28.06.2017
	Reg. Ref. 17784	<ul style="list-style-type: none"> • 26 no. units for commencement 14.09.2018
	Reg. Ref. 18573	None Found
	No. Units with Commencement Notices on BCMS: 117 no. Units	
Old Golf Links Road and Tuite's Lane Blackrock	Reg. Ref. ABP-303253-18	None Found
No. Units with Commencement Notices on BCMS: None Found		
Total No. Units with BCMS Commencement Notices on Phase 2 lands: c. 453 no. Units		
Total No. Non-'Committed' Units with BCMS Commencement Notices on Phase 2 Lands: 48 no. Units		

Table B4. Phase 3 Lands: Commencement Notices Submitted on BCMS System 2014 to April 2019

Location	Planning History	Commencement Notices BCMS 2014 to Present
Armagh Road.	Reg. Ref. 08520189 (392 no. Units Permitted))	None Found
	Reg. Ref. 081013 (83 no. units permitted)	None Found
	Reg. Ref. 181060 (Extend Reg. Ref. 08520189)	None Found
No. Units with Commencement Notices on BCMS: None		
Lis Na Dara (Phase 3)	Reg. Ref. 08/60 (92 no. Units)	None Found
No. Units with Commencement Notices on BCMS: None		
Mounthamilton, Carrickmacross Road, Ardee Road	Reg. Ref. 07520013 (179 no. Units Permitted)	None Found
	Reg. Ref. 07520315	None Found
	Reg. Ref. 12520015	<ul style="list-style-type: none"> • 68 no. units for commencement 06.02.2018 • 68 no. units for commencement 07.07.2017 • 68 no. units for commencement 11.05.2017 • 68 no. units for commencement 11.05.2017 • 68 no. units for commencement 14.02.2017 • 68 no. units for commencement 30.01.2017 • 68 no. units for commencement 30.01.2017 • 68 no. units for commencement 30.01.2017 • 68 no. units for commencement 09.09.2016 ((It is assumed that these notices are for the same 68 no. units, given that the description for all of the notices is the identical)
	Reg. Ref. 12520066	None Found
	Reg. Ref. 16684	None Found
	Reg. Ref. 17414	None Found
	Reg. Ref. 17662	• 20 no. units for commencement 10.12.2018
	Reg. Ref. 17867	<ul style="list-style-type: none"> • 11 no. units for commencement 27.06.2018 • 18 no. units for commencement 26.03.2018 • 31 no. units for commencement 17. 10.2018
	No. Units with Commencement Notices on BCMS: 148 no. Units	
Priorland, Area P1. Dublin Road	Reg. Ref. 07520214 (143 no. Units)	None Found
No. Units with Commencement Notices on BCMS: None		
Belfield Dublin Road, Haggardstown.	Reg. Ref. 06/900 (150 No. Units)	None Found
	Reg. Ref. 09813 (126 no. Units)	None Found
	Reg. Ref. 15296	None Found
	Reg. Ref. 1624	None Found
No. Units with Commencement Notices on BCMS: None		
Total No. Units with BCMS Commencement Notices on Phase 3 lands: 148 no. Units		
Total No. Non-'Committed' Units with BCMS Commencement Notices on Phase 3 Lands: 0 no. Units		

Table B5. Other 'Committed Lands': Commencement Notices Submitted on BCMS System 2014 to April 2019

Location	Planning History	Commencement Notices BCMS 2014 to Present
Carnbeg Golf Club (Zoned for Tourism and Leisure)	Reg. Ref. 0693 (448 no. Units Permitted)	None Found
	Reg. Ref. 08171	None Found
	Reg. Ref. 12548	None Found
	Reg. Ref. 12549	None Found
No. Units with Commencement Notices on BCMS: None		
Knockshee, Old Golf Links Road Blackrock. (Zoned Retail, Leisure, recreation and community)	Reg. Ref. 06753	None Found
	Reg. Ref. 061786	None Found
	Reg. Ref. 07/139	None Found
	Reg. Ref. 1043	None Found
	Reg. Ref. 1133	None Found
	Reg. Ref. 11139	None Found
	Reg. Ref. 14191 (6 no. Units)	None Found
Reg. Ref. 15489 (17 no. Units)	<ul style="list-style-type: none"> 17 no. units for commencement 10.04.2017 	
No. Units with Commencement Notices on BCMS: 17 no. Units		
Old Golf Links Road, Blackrock (Zoned Retail, Leisure, recreation and community, and Residential Unphased)	Reg. Ref. 04/1430	None Found
	Reg. Ref. 05/1518	None Found
	Reg. Ref. 06/1422	None Found
	Reg. Ref. 07195	None Found
	Reg. Ref. 08886	None Found
	Reg. Ref. 09249	None Found
	Reg. Ref. 1443	<ul style="list-style-type: none"> 17 no. units for commencement 20.04.2015
No. Units with Commencement Notices on BCMS: 17 no. Units		
Fairways Hotel, Dublin Road/ Old Golf Links Road, Blackrock (Zoned Retail, Leisure, recreation and community)	Reg. Ref. 071247 (93 no. Units)	None Found
	Reg. Ref. 12149	None Found
No. Units with Commencement Notices on BCMS: None		
Cois Farraige (Residential 1. Unphased)	Reg. Ref. 05/1061 (43 no. Units)	None Found
	Reg. Ref. 06476	None Found
No. Units with Commencement Notices on BCMS: None		
Total No. Units with BCMS Commencement Notices on other lands: 34 no. Units		
Total No. Non-'Committed' Units with BCMS Commencement Notices on Other Lands: 34 no. Units		

APPENDIX C

REVIEW OF PERMITTED RESIDENTIAL DENSITIES FROM HOUSING SURVEY 2010 UP TO APRIL 2019

Table C1. Residential Densities Permitted on Phase 1 and 2 lands following Variation No. 1 of Dundalk and Environs Development Plan 2009.

Location	Reg. Ref.	Summary of Description of Development	No. Additional Units Granted	Stated Net Residential Density
Lis Na Dara	14520049	67 no. units at Lis na Dara	67 no. Units	23 Units per Hectare
Racecourse Road, Dundalk.	10520033	Revisions To Reg. Ref. 06/339.	No change	Not Stated c.33 units per hectares
	12520067	Extension of Duration Reg. Ref. 06/339	No change	No change
	17661	Further Extension Of Duration Reg. Ref. 06/520339	No change	No change
Lismullen Grove, Armagh Road, Dundalk	14234	Permission for 23 no two storey Units	23 no. Units	24 units per Hectare
Coulter Place, Armagh Road, Dundalk	10520047	Retain And Complete 22 no. units and Construct 84 Residential Units.	106 no. Units	28 units per Hectare
	14352	Extension of Duration of Reg. Ref. 10520047	No change	No change
	15755	Revise permission Reg. Ref 10520047	No change	No change
	17705	Revise permission Reg. Ref 10520047	20 no. dwellings in lieu of 21 no.	Not Stated
Carlinn Hall, Mullagharlinn Road, Dundalk.	09863	Revisions to Reg. Ref. 04/1451 (amended by PL Ref 08/722)	Reduce by 21 no.	Not Stated
	10571	Retain and permit revisions to Reg. Ref. 04/1451 (amended by Planning Ref. Nos. 08/722 & 09/863)	No change	No change
	1275	Extension of duration of Reg. Ref. 04/1451 (298 units)	No change	No change
	13265	Revisions to Reg. Refs. 04/1451 and 12/75	2 no. Additional Dwellings	Not Stated
	13524	Revisions to Reg. Refs. 04/1451 and 12/75	Reduced Units from 22 no. to 11 no.	Not Stated
	14368	Revisions to Reg. Refs. 04/1451 and 12/75	3 no. units in lieu of 5 no.	Not Stated
	14534	Revisions to Reg. Refs. 04/1451 and 12/75	Reduce Units from 42 no. to 29 no.	Not Stated
	15212	Revisions to Reg. Refs. 04/1451, 12/75, 13/265, 13/524, 14/368 & 14/534	Reduce units from 235 to 191	30.5 units per Hectare
	15566	Retention and permit revisions to Re. Refs. 04/1451 and 12/75.	No change	No change
	15772	Revisions to Reg. Refs. 04/1451 and 12/75	Reduced by 1 no. Units	Not Stated
	1612	Revisions to Reg. Ref. 15/212.	1 no. Additional Dwelling	30 units per ha
	1661	Revisions to Reg. Refs. 04/1451, 12/75, 14/534 and 15/212.	56 no. Units	30.2 Units per Ha
	17225	Provide 17 no. Units	17 no. Units	Not Stated
	17232	Provide 9 no. Units	9 no. Units	Not Stated
18231	Extension of Duration of Reg. Ref. 1661	No change	No change	
Haggardstown/ Haynestown, Dundalk	1591	Extension of Duration of Ref. Ref. 03/1754	No change	Not Stated
	1597	Extension of Duration of Reg. Ref. 08/1309	No change	Not Stated

Location	Reg. Ref.	Summary of Description of Development	No. Additional Units Granted	Stated Net Residential Density
	15808	Revise House Types under Reg. Ref. 061075).	No change	Not Stated
	1611	Revise layout of Reg. Refs. 061075 & 080832)	No change	Not Stated
	1651	Revise layout permitted under Reg. Ref. 061075	No change	Not Stated
	16388	Revise House Type of Reg. Ref. 03/1754, 06/1075, and 15/91).	No change	Not Stated
	16389	Revise House Type of Reg. Ref. 03/1754, 06/1075, and 15/91).	Not Stated	Not Stated
	16584	Revise House Type of Reg. Ref. 03/1754, 06/1075, and 15/91).	Reduce from 57 no. units to 53 no.	Not Stated
	18104	Revise House Types of Reg. Ref. 03/1754, 06/1075, and 15/91	No change	Not Stated
St Judes, Dublin Road, Haynestown , Dundalk	17900	Application for the construction of 3 new two storey 4 bed dwelling houses	3 no. Units	Not Stated
Arva Lane, Cocklehill,, Blackrock, Dundalk, County Louth	10498	Permission for 2 no. houses	2 no. Units.	Not Stated
	11351	Permission for 1 no. houses	1 no., Unit	Not Stated
Seafiel Road, Blackrock, Dundalk	10212	Louth County Council to provide 90 no.	90 no. Units	Not Stated
Hamilton, Rock Road, Blackrock, Dundalk	12439	Extension of Duration Reg. Ref. 08/240	No change	Not Stated
	13112 PL15.242755	Provide 24 no. Units	24 no. Units	Not Stated c. 11.2 units per ha
	1747	Provide 12 no. Units	12 no. Units	Not Stated
	18288	Revise Reg. Ref. 1747.	No change	Not Stated
Blackrock Cove, Golf Links Road , Haggardstown, Blackrock	13379	Extension of Duration Reg. Ref. 08/650	No change	Not Stated
	14450 PL15.244462	Revise Reg. Ref. 08/650 and 13379	Reduce from 145 no. units to 125 no.	19 units per Ha
	15658	Revise Reg. Ref. 14/450.	No Change	No Change
	16151	Revise Reg. Ref. 14/450.	No change	No Change
	16363	Revise Reg. Ref. 14/450.	No change	No Change
	16926	Revise Reg. Ref. 14/450.	4 no. Additional Units	19 units per Ha
	17784	Revise Reg. Refs. 08/650, 13/379, 14/450 (PL.15.24446) & 15/658.	8 no, Additional Units.	20 units per Ha
Old Golf Links Road and Tuite's Lane, Blackrock	ABP-303253-18	SHD: 158 no Units	158 no. Units	36 units per Ha
Average Residential Density for 8 no. Phase 1 and 2 sites where residential density has been stated in application documentation or calculated approximately for the purposes of this report.				c. 25.6 Units per Ha

APPENDIX D

EXCERPT FROM TRANSPORT AND ACCESSIBILITY REPORT PREPARED BY ATKINS

Figure D1. Comfortable Walking and Cycle Catchments

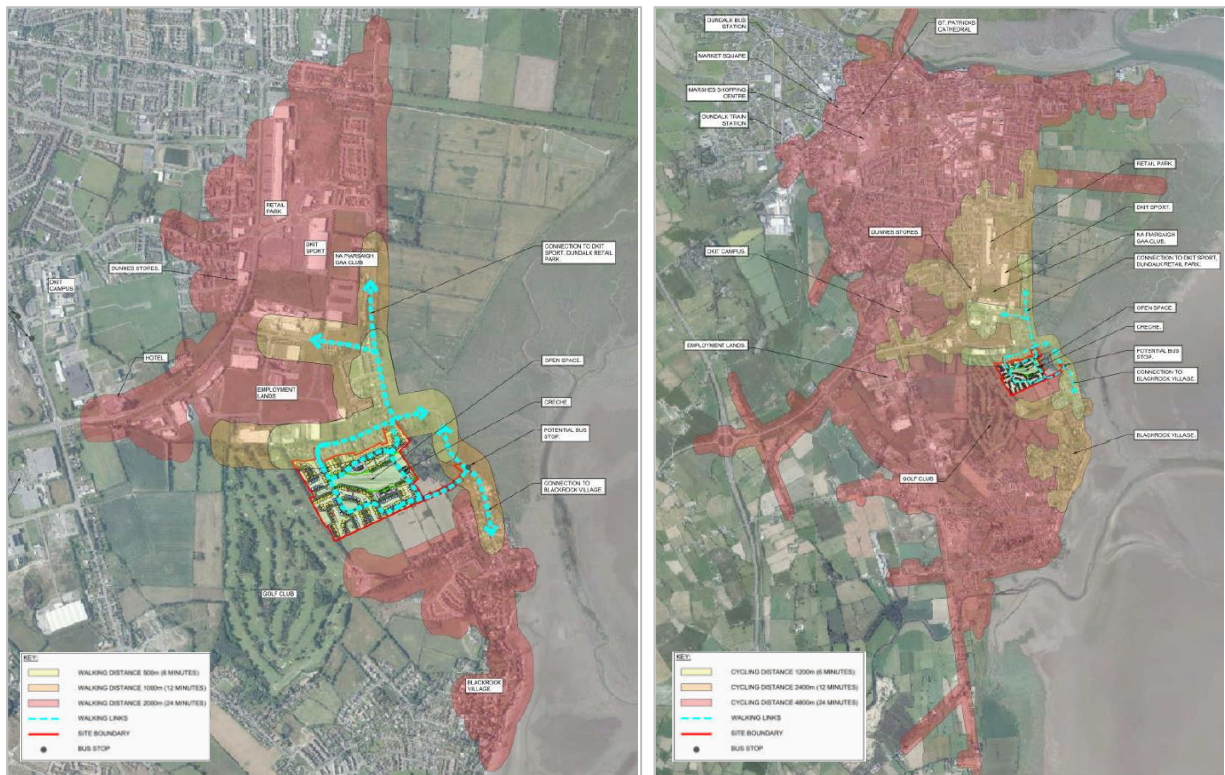


Figure D2. Existing Public Transportation Linkages

