



## Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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### **Draft Louth County Development Plan 2021-2027**

The Eastern and Midland Regional Assembly notes the publication of the Draft Louth County Development Plan 2021-2027 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been reviewed by the executive and approved by the members of the Assembly on 11<sup>th</sup> December 2020.

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

As indicated in the Assembly's previous submission to the County Development Plan review process made under Section 27A of the Planning and Development Act 2000, as amended, the Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region, made on 28<sup>th</sup> June 2019, which consequently initiated the statutory time period within which the Council are required to prepare their Draft Development Plan, as stated at Section 11(1) (b) of the Planning and Development Act 2000, as amended (the Act). In this regard, The Assembly welcomes the publication of the Draft Louth County Development Plan which enables the coordinated and timely incorporation of Project Ireland 2040 - the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), thus ensuring full alignment between local, regional and national planning policy.

#### **Legislative Context**

As required by Section 27B of the Act, The Eastern and Midland Regional Assembly has prepared this submission, and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the aforementioned Act, a submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft development plan, and in particular its core strategy are consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the draft development plan, and its core strategy are not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27B of the Act.

The attention of the Council is also directed to the requirements of Section 12 (4) of the Act, whereby a Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly, and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

### **Submission**

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in order to prepare the Draft Plan and, in particular, that this work follows a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the RSES and the establishment of the Office of the Planning Regulator. Accordingly, the Assembly welcomes the overall approach and effort of Louth County Council to coordinate and incorporate policies and objectives, so that they are consistent with the NPF and RSES.

The Assembly considers that the overall draft development plan, including its Core Strategy, are generally consistent with the RSES subject to the contents of the remainder of this submission. The submission broadly follows the chapter headings of the Draft Development Plan, under the following headings:

1. Introduction
2. Core Strategy and Settlement Strategy
3. Housing
4. Social and Community
5. Economy and Employment
6. Tourism
7. Movement
8. Natural Heritage, Biodiversity and Green Infrastructure
9. Built Heritage and Culture
10. Utilities
11. Environment, Natural Resources and The Coast
12. Climate Action
13. Development Management Guidelines
14. Implementation and Monitoring
15. Settlement Plans
16. SEA, AA and SFRA

### **1. Introduction**

The Assembly welcomes the preliminary 'Introduction' Chapter that provides a good overview of the Draft Plan's direction, strategic vision, review process, policy context and format. The Assembly welcomes the new approach taken to the Draft Development Plan recognising the new national and regional policy requirements and the significance of the Region's two Regional Growth Centres of Drogheda and Dundalk in the county. The approach also recognises the current challenging and changing environment particularly in the context of Brexit and the Covid-19 pandemic.

In particular, the Assembly welcomes the approach taken to achieve national and regional alignment, recognising the RSES Regional Strategic Outcomes (RSOs) and aligning with the three key principles of Healthy Placemaking, Climate Action and Economic Opportunity. Table 1.1 indicates the alignment of the chapters of the Development plan with these three key principles and the RSES 16 RSOs. It is considered that the demonstration of alignment would also benefit from the inclusion of Figure 2.4 of the RSES which identifies these 16 specific RSOs.

## **2. Core Strategy and Settlement Strategy**

The Assembly acknowledge the clear and evident work that has gone into the preparation of Chapter 2 which details the Core Strategy and Settlement Strategy.

The clear reference to the legislative requirements of the Core Strategy, coupled with the detailed analysis of the relevant national (NPF) and regional (RSES) contexts, at Sections 2.2 and 2.3 of the draft plan, clearly sets out the foundations of the Core Strategy presented. The stated utilisation of an evidence based approach is welcome by the Assembly and is considered to ensure a consistency in approach to the core strategy. The strategic objectives of the core strategy and population analysis presented, at Sections 2.4-2.6, provides understanding for the formulation of policy contained in the remainder of the Chapter.

### **2.1 Statutory Requirements**

Louth County Council are reminded of their obligations to prepare a Core Strategy in accordance with the provisions of Section 10 of the Act. Relating specifically to this chapter of the Draft Plan, the Assembly draws the attention of the Council to the contents of Section 10 (2A), (2B) and (2C) of the Act and requests Louth County Council to ensure consistency in this regard.

### **2.2 General**

Louth's growth strategy as set out in Section 2.4.4 has been informed by the principal elements of the RSES growth strategy in conjunction with the environmental sensitivities of the county. The focus of the growth strategy will be on prioritised targeted population and economic growth to the designated Regional Growth Centres of Drogheda and Dundalk, to capitalise on their strategic location along the Dublin-Belfast Economic Corridor, and balanced, contained and sustainable growth including brownfield/infill sites in the self-sustaining growth towns, self-sustaining towns and other smaller towns and villages. These key principles for growth are considered to provide a robust foundation for the Chapter. The Assembly welcomes that it is a strategic objective to ensure that development and growth in County Louth occurs in line with both National and Regional Policy objectives as provided for in the NPF and the RSES and which have been crucial in the formation of the Core Strategy Table and Core Strategy Map, and indeed the remainder of the County Development Plan.

#### **2.2.1 Population**

The Core Strategy provides a comprehensive analysis of population trends and distribution within the County from 2011-2016 and notes that the highest recorded increase occurred in the Regional Growth Centres of Drogheda and Dundalk (46.6%). It is noted that the towns of Dunleer and Ardee which are

newly categorised as self sustaining growth settlements had a near stagnant population change during the same period with a population increase of only 0.6% or 37 people. The smaller towns had a population increase of 22.8% while the villages and open countryside accounted for 30% of the growth during that same period.

The Core Strategy Table indicates a population increase for County Louth of 21,082 people to 2027 (149,966). This level of overall population growth is considered to be generally in keeping with the population prescribed for the County at Appendix 2 of the NPF Implementation Roadmap, which details a high-level population projection of 148,375 (high and including 25% headroom) to 2026 and 151,500 (high) to 2031. The total figure also includes a projected increase of 1,591 persons for the additional year of 2027. It is considered that this section would benefit from a short explanation to the calculation of this projected annualised figure for 2027.

It is noted that the Core Strategy Table outlines that the population for the Regional Growth Centres of Drogheda and Dundalk are set to increase by 6,914 and 7,660 people respectively to 2027 from their recorded 2016 populations of 34,199 and 39,004. This marks a growth rate of 20% and 19.6% respectively from 2016 for each of the Regional Growth Centres with total projected populations of 41,113 and 46,664 to 2027. It is acknowledged that the plan demonstrates a policy shift towards more focused growth in these higher tier settlements given the very low % growth experienced between 2011-2016 for the Drogheda (4.9%) and Dundalk (3.1%). It is considered prudent however, that the Council strengthens this policy shift in order to achieve the RSES target population of 50,000 for each of these Regional Growth Centres by 2031. Furthermore, it is highlighted that the projected growth rate of the southern environs of Drogheda to 2026 as expressed in the Draft Meath County Development Plan 2020 is 50%. Given this context and the requirements of significant rates of population growth in National Policy Objective 9 of the NPF, it is recommended that the Council consider the growth rate for the Regional Growth Centres of Drogheda and Dundalk and include an analysis and rationale of the proposed rates within the core strategy.

The self sustaining growth towns of Ardee and Dunleer are set to increase by 1,655 and 935 people respectively to 2027 from their recorded 2016 population of 4,928 and 1,822. This marks a growth rate of 34% and 50% respectively, which is in excess of the percentage growth rate projected for the Regional Growth Centres of Athlone, Drogheda and Dundalk. The National Planning Framework indicates that in each Regional Assembly area, where it is proposed to target significant growth, i.e. at a rate of 30% or more above 2016 population levels to 2040, in any settlement not identified in Policy 2a or Policy 2b of the NPF, for example where there will be major employment or infrastructure investment, this will be on an agreed basis, aligned with investment in infrastructure and/or the provision of employment, together with supporting amenities and services. This is further detailed by National Policy Objective (NPO) 9 of the NPF. In order to ensure compliance with the requirements of the NPF and RSES, it is recommended that the Council provide a robust and clear rationale, in accordance with NPO 9, that outlines the suitability, or otherwise, of these growth rates for Ardee and Dunleer.

It is further highlighted that the land use zoning map for Ardee indicates a considerable bank of strategic land reserve to both the north and south of the town. The L1 Strategic Reserve zoning objective is “to provide a land reserve for the orderly expansion of the settlement into the future”. It

is recommended that the core strategy clearly define the function of strategic reserve lands in the narrative and their appropriate delivery beyond the 2027 plan period which should also be reflected in the zoning objective. The Council are also directed to RPO 4.2 which requires that all residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services, and so that the assimilative capacity of the receiving environment is not exceeded.

It is also noted that there appears to be an error in the projected percentages of total growth rate 2021-2027 as stated under Section 2.5.4 where it states “69% of the projected targeted to Drogheda and Dundalk.” The percentage targeted to Ardee and Dunleer is calculated to be 12.3% (not 8.7%) and the residual to be 18.5% (not 22%) based on the percentages presented in Column I of Table 2.9.

### **2.2.2 Compact Growth**

The Assembly welcomes the statement expressed in Section 2.66 of the Draft Plan which recognises that Louth is required to deliver at least 30% of all new homes within existing built up footprints (NPO 3c), and achieving this target can be realised through urban regeneration and infill/brownfield site development, which is in accordance with RPO 3.2 of the RSES. The Plan states that an analysis of appropriate brownfield and infill sites with potential capacity to deliver new homes was completed for Dundalk, Drogheda, Ardee and Dunleer and the remaining Level 3 settlements, i.e. the self sustaining towns. Details of the potential capacity are provided in Table 2.15.

It is noted that the heading of Column K should be revised to “Units to be delivered on infill/brownfield lands” to avoid ambiguity. It is acknowledged that c. 52% of the total allocated housing units for the county will be delivered on infill/brownfield lands which exceeds the 30% compact growth requirement, which is welcome. In terms of Columns J and L which provide figures on the lands with potential to deliver infill/brownfield development and total zoned lands for residential, the Council is requested to clarify the particularly low figures for Drogheda (16%) and Dundalk (11%) and provide clarity/reasoning in the narrative regarding allocated units vis-à-vis total lands available.

It is therefore recommended that the Core Strategy is amended and/or additional narrative included to provide clarity around the core strategy table with regards to the percentage and quantum of compact growth that can be delivered on brownfield/infill land within the plan period.

### **2.2.3 Core Strategy Objectives**

The Assembly welcomes the emphasis placed in the core strategy on economic development recognising Louth’s strategic and central location with the Regional Growth Centres of Drogheda and Dundalk on the Dublin-Belfast Economic Corridor which is in accordance with the principles of the NPF and RSES. It is considered that a short statement could be included within Section 2.7 referring to the significance of the statutory cross boundary Joint Urban Area Plan (UAP) for Drogheda particularly having regards to the reference made around a necessary co-ordinated approach to infrastructure investment in these centres.

The Assembly welcomes the overarching strategic policy objectives for the County in particular the objective to achieve compact growth and preference for infill, brownfield and regeneration sites (CS

2). In addition the specific core strategy objectives for the Regional Growth Centres of Drogheda and Dundalk are appropriate with respect to population growth and recognising their strategic position and cross border potential on the Dublin Belfast Economic Corridor (CS 6, 7, 8), and the objectives to prioritise the Joint UAP for Drogheda with Meath County Council and the UAP/LAP for Dundalk, in alignment with RPOs 4.11 and 4.19 of the RSES. With respect to the Joint UAP and in terms of consistency with the RSES it is recommended the Council amend all references to the UAP in the plan to “cross boundary statutory Joint Urban Area Plan (UAP)” in accordance with RPO 4.11 of the RSES.

It is also a recognised and a welcome addition that the Council’s commitment to Climate Action is expressed in the overarching strategic policy objective CS 5 which supports the implementation of the EU Green Deal, National Climate Action Plan, Programme for Government, Adaptation Strategy and Climate Action Charter.

The Assembly further welcomes the core strategy objectives included for Ardee and Dunleer (CS 11 and 12) recognising the need to prepare LAPs to effectively plan for their role as local drivers and self-sustaining growth towns in the settlement hierarchy. The core strategy objectives for small towns and villages are appropriate, emphasising the need for sustainable growth with the creation of sustainable rural communities and strengthening and rejuvenating the fabric of rural villages (CS 14 and 15).

In terms of ensuring compliance with the population allocations defined by the Core Strategy Table 2.14 and given the County’s recent trend in growth in lower tier settlements (30% of overall County growth 2011-2016), it is considered important that a record be maintained of residential development particularly residential development permitted in individual settlements. As such, the Assembly welcomes Policy Objective HOU 6 as presented in the Housing Strategy which proposes to monitor and maintain a record of residential development in settlements designated under the Settlement Hierarchy. It is recommended that the Council also consider adding a reference to the monitoring of residential development permitted as single rural houses. This would be reflective of NPO 36 of the NPF which outlines that *‘New statutory guidelines, supported by wider methodologies and data sources, will be put in place under Section 28 of the Planning and Development Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will be supported by the provision of standardised requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation.’*

#### **2.2.4 Capacity and Delivery**

The Assembly welcomes the statement in Section 2.1 that the housing demand and land requirement for residential and mixed use development in the county has regard to the capacity of existing zoned land, the phasing of development, takes account of services and emerging transport and mobility trends and is supported by the overarching strategic policy objective CS 1. Further, policy objectives CS 2 and CS 3 reinforce the requirement that all settlements are to develop in a self-sufficient manner in tandem with the provision of economic, physical and social infrastructure, deliver at least 30% of all new homes within the existing built up footprint, and promote consolidation through infill and brownfield lands in preference to greenfield sites, which are welcome additions and align with the Settlement Strategy of the RSES, RPOs 3.2, 4.1 and 4.2. The Assembly also welcome CS 4 that supports

the progression and delivery of projects including those funded by the Urban or Rural Regeneration and Development Funds.

It is recommended that to further reinforce clarity around compact growth and appropriate phasing of development that a specific core strategy objective be included indicating the intention of operating an order of priority for lands specifically referring to the longer term delivery of lands zoned as strategic reserve to be delivered beyond the current draft plan cycle.

The role, function and delivery capacity of each of the settlements have been outlined and the Assembly welcome the evidence base approach to the development strategy statements to the towns and villages as set out in Volume 2. It is considered that these statements will assist in the preparation of future LAPs within the County. In terms of land use zoning in general, all zonings for new development should be sequential, consolidated and in line with compact growth to be sustainable. The Assembly notes that the Draft Plan references the two-tier approach as detailed in Appendix 3 of the NPF, and have provided in Appendix 2 an Infrastructure Assessment and Land Use Evaluation with respect to the infrastructure requirements of potential development sites in each settlement in County Louth. The Assembly consider that in the absence of development plan guidelines and a national methodology to the two-tier approach to zoning, that this is a very welcome addition and commend the work undertaken. It is recommended that a summary of the findings of the assessment be set out in the core strategy and the subsequent tiering of zoned lands be indicated on the official zoning maps for each of the settlements.

### **2.3 Settlement Strategy**

Local authorities are to apply an evidence driven asset-based approach to the consideration of all settlements in accordance with RPO 4.1 and 4.2 of the RSES which require that the hierarchy of settlements in development plans shall be determined in accordance with the hierarchy, guiding principles and typology of settlements as set out in the RSES. The Assembly welcomes the Settlement Hierarchy included in Table 2.4 which takes account of the function and role of each of the identified settlements in accordance with the identified settlement hierarchy of the RSES. The draft plan states that the hierarchy has been informed by a range of factors including population, employment base, facilities and service provision, recent growth levels and capacity to accommodate future growth. This is reflective of the asset-base approach undertaken in the RSES and will ensure a consistency of approach to settlement growth. The Assembly welcome the emphasis placed on the Regional Growth Centres of Drogheda and Dundalk as expressed in Sections 2.13 and 2.14 which are prioritised for a target population growth of 50,000 by 2031, and emphasis on regeneration, economic development, enabling infrastructure and accessibility, in accordance with the settlement hierarchy of the RSES.

In terms of the Regional Growth Centre of Drogheda, the suite of strategic settlement strategy policy objectives are generally aligned with the Regional Policy Objectives set out in the RSES, particularly policy objectives SS1 and SS2 recognising Drogheda as a driver of growth along the Dublin Belfast Economic Corridor. As stated earlier, and in terms of consistency, it is recommended that all references to the Joint Urban Area Plan for Drogheda (SS 3) should be amended to “cross boundary statutory Joint Urban Area Plan (UAP)” in accordance with RPO 4.11 of the RSES. In terms of policy objective SS9 relating to Drogheda Port, the Council is directed to RPO 4.12 which also refers to

facilitating the relocation of the port subject to a feasibility study and appropriate coastal zone management.

In terms of the Regional Growth Centre of Dundalk, the Strategic Settlement Strategy Policy Objectives for Dundalk as set out in Section 2.14.8 are generally aligned with the RPOs of the RSES, however reference to the Dublin-Belfast Corridor as per RPO 4.21 for Dundalk in the RSES should be recognised and also included in these suite of policy objectives as per Drogheda above. Further, in terms of consistency of approach between both the core and settlement strategies, the Council should also consider including a Strategic Settlement Strategy Policy Objective to prioritise and undertake the statutory Urban Area Plan for Dundalk in this suite of policies to reinforce policy objective CS 10 and to be aligned with RPO 4.19 of the RSES. The Council is also recommended to amend SS24 to include the Dundalk Port/Harbour area as a key opportunity/regeneration site in recognition of the proximity of these lands to the town centre as expressed in Section 2.14.3 of the plan and RPO 4.23 of the RSES. In terms of both Regional Growth Centres, the inclusion of SS4 and SS22 in terms of higher densities in centrally located areas in Drogheda and Dundalk are a welcome addition.

The Assembly welcomes the recognition provided in Section 2.3.2 that Louth has no designated Key Towns within the County and that the remaining settlement typologies identified in the RSES are defined by the development plan using an evidenced base approach. The use of consistent terminology, reflective of that contained in the RSES, is appropriate and welcome. Below the Regional Growth Centres, Ardee and Dunleer are designated as self sustaining growth towns based on their importance as local service centres and high job:workforce ratios, which, in addition to recent development pressures on the ground, support their positioning in this category. The Assembly acknowledge the legacy of development that has taken place in the smaller settlements and that the new settlement hierarchy is proposing to refocus the future development to the Regional Growth Centres, followed by the mid-tier self-sustaining growth towns to provide some balance to future growth within the county.

It is noted that the 5 lower tier and small town settlements have been recategorised to Self-Sustaining Towns: Carlingford, Clogherhead, Castlebellingham/Kilsaran, Termonfeckin and Tullyallen based on population of these settlements and low jobs ratio, where there will be a focus on employment generating opportunities. A written statement and associated land use zoning and composite maps for each of the Self-Sustaining Towns are provided in Volume 2 of the Draft Plan which is welcome.

Sections 2.17 and 2.18 sets out the settlement strategy for the small, towns and villages and rural villages with a focus on localised sustainable growth and priority given to infill and brownfield development. The Strategic Policy Objectives for Self-Sustaining Towns, Small Towns, Villages and Rural Villages that support and facilitate balanced and proportionate population and economic growth in these areas, are welcome. In this regard, the Assembly in particular welcomes the priority given to the regeneration of vacant and underutilised lands alongside the support for the development of 'New Homes in Small Towns and Villages' initiative in SS56 (aligning with NPF NPO 18b and RPO 4.78 of the RSES) between local authorities, infrastructure agencies, and local communities to provide opportunities to boost economic development and rejuvenate rural communities in the County.

### 3. Housing

The Assembly welcomes the inclusion of housing policy that has been informed by the Housing Strategy that includes a Housing Need Demand Assessment (HNDA). The HNDA ensures that the draft plan is supported by a robust methodology and evidence base to inform decision-making around the current and future housing supply and investment in housing related infrastructure and services, the location and requirements for different house types, sizes and tenures and the requirements for residential zoned land. It is acknowledged that Louth County Council have undertaken a HNDA, as part of the Housing Strategy, in accordance with National Policy Objective (NPO) 37 and Regional Policy Objective (RPO) 9.5, during a time when the finalised HNDA guidance at national level is yet to be confirmed. The initiative of the Council in this regard is extremely welcome.

The inclusion of a number of policy objectives to ensure the provision of housing needs within County Louth is welcome. This includes, for example, policy objectives related to emergency accommodation and housing for older people, disabled, homeless, travellers etc, encouraging the reuse of upper floors of buildings within town centres, promoting social integration within residential developments, and the provision of quality social and affordable housing to name a few. The Assembly welcome Section 3.5.4 and associated policy objective HOU 9 on Regeneration Areas and the areas identified for regeneration expressed in Table 3.1 capable of creating more sustainable neighbourhoods and communities and focusing on Drogheda, Dundalk and Ardee. The policy objectives HOU 15 and 16 that support higher, sustainable densities and support compact growth and consolidation in urban areas including the Regional Growth Centres of Drogheda and Dundalk are welcome additions.

The Assembly further welcomes the principles for quality design and layout set out in Section 3.13 including placemaking. The Council is also directed towards Section 9.4 of the RSES which focuses on creating healthy placemaking which is one of the three key principles of the RSES. This section would benefit from reference to healthy placemaking and the guiding principles for same as set out in Chapter 9 of the RSES and which cross over with Chapter 4 of the draft plan on Social and Community.

The Council's new approach to rural housing policy is a welcome and considerable step change to the previous development control zones for rural housing under the previous plan. The Assembly support that the Council have moved towards a rationalised policy, zone-based system and have considered areas under rural pressure and areas under considerable environmental pressure. The new approach to rural generated housing need and qualifying criteria as set out in Section 3.17.4 is generally consistent with RPOs 4.80 and 4.81 of the RSES. The overall section of the Plan on rural housing would also benefit from the inclusion of a related policy objective around siting and design.

Notwithstanding the above, the Assembly notes the facilitation of backland development in the most sensitive of rural areas in the county as provided under Section 13.9.43. Development of this nature are inappropriate and have potential for significant adverse environmental effects, as highlighted in the Strategic Environment Assessment (SEA). The inclusion of flexibility in this regard dilutes the intention of the Council to ensure the protection of the open countryside through the avoidance of urban generated housing and is not considered to be consistent with the RSES. It is recommended that prior to the finalisation of the Draft Plan, the Council ensure that related policy in this regard is consistent with RPOs 4.80 and 4.81, NPO 19 of the NPF and the content of Circular Letter PL 2/2017

“Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans.”

Given the HDNA undertaken, it is considered additional information could be provided within this chapter of the plan such as a clearly presented summary of the entire housing need in County Louth, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes. This will present a clear and concise guide as to what is required to successfully deliver the housing requirement for the County over the plan period.

It is also noted that the NPF requires that development plans quantify the demand for single housing in the countryside with National Policy Objective 20 outlining the requirement to *‘Project the need for single housing in the countryside through the local authority’s overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes’*. In this regard, it is recommended that as part of the core strategy a rationale be included that sets out the arrival of the housing allocation figures for rural areas.

#### **4. Social and Community**

The inclusion of this chapter as part of the Draft Plan is a welcome addition. It is reflective of, and reinforces, the content and policy of Chapter 9 of the RSES, particularly around health policy, healthcare and outdoor recreation. It emphasises the need for community facilities and social infrastructure and highlights the importance of the use of assessment tools such as Social Infrastructure Assessment. The chapter also includes topics such as social inclusion, education, childcare, and arts, culture and language. The policy objectives supporting the expansion and development of Dundalk Institute of Technology as a centre of excellence, along with Drogheda Institute of Further Education are welcome in accordance with RPO 4.22 (Dundalk specifically) and RPO 6.27 with regards to adult education generally.

#### **5. Economy and Employment**

The Economic Development and Employment Chapter presented as part of the Draft Plan is comprehensive and the approach taken is welcomed by the Assembly. The Chapter’s stated overall aim is to support and facilitate viable economic development and job creation, across a range of sectors and that the county continues to be well positioned to facilitate further economic investment and respond to any economic uncertainties. The economic strategy for the county is based on a vision of developing a strong economic base supported by enterprise, innovation and skills.

The chapter sets out the economic profile of Louth, the economic strategy, recent economic trends including challenges to economic growth and an overview of the economic environment of the County at present and therefore creates a strong evidence base for the formulation of related economic policy. It focuses on key drivers including the Dublin-Belfast Economic Corridor, Education and Training, Co-working facilities and home based activities and marine opportunities and then sets out the areas identified for employment related growth which are to be concentrated in the Regional Growth Centres of Drogheda and Dundalk and supported by Ardee and Dunleer.

Overall, the Assembly welcomes that the primary location for employment related development will be in the Regional Growth Centres of Drogheda and Dundalk by recognising their strong employment base, capacity to accommodate further investment and ability to support and promote economic development along the Dublin Belfast Economic Corridor. The Assembly welcomes the inclusion of policy objectives EE 1 and EE 12 which focuses on the Regional Growth Centres and the locational advantage of the Dublin Belfast Economic Corridor. The Council also aims to engage and work closely with EMRA and adjoining local authorities in promoting economic development on this corridor which is a welcome addition (EE 2).

The Assembly welcomes the emphasis and commitment placed in this chapter to cross border investment which is demonstrated by the number of projects currently undertaken in Louth and supported by policy objective EE 11 which aligns with RPO 4.13 and 4.20 of the RSES. The suite of policy objectives EE 4, 5, 6, 7, 9, 10, 11 and 13 also emphasise the Council's commitment to working in partnership and collaboratively with the various Government Departments, regional assemblies, sectors, education institutions, agencies and stakeholders etc. to maximise job creation and economic development in the County.

Section 5.9 supports the development of co-working facilities, start-ups, small and medium sized local indigenous enterprises, clustering, research, unexpected opportunities and the recognised benefits to sustainable communities with a number of policy objectives to support including EE 14, 15, 16, 17, 18, 19, 20, 21, 22, 23. This aligns in particular with RPOs 6.2 and 6.31 of the economic strategy of the RSES.

The Assembly welcome the approach taken by the Council to concentrate economic development and growth into the Regional Growth Centres of Drogheda and Dundalk and the inclusion of supportive policies EE 3, 27, 28, 29, 30, 31 are welcome additions. The acknowledgement and support for the development of Smart City Programmes in the Regional Growth Centres is also welcome, in accordance with RPO 6.30 of the RSES. It is recommended that the chapter also include a policy objective and supporting narrative relating to Smart Specialisation, and the Council are directed to Chapter 6 Economic Strategy of the RSES in this regard.

The Assembly further welcomes the special attention provided in the Plan to Drogheda and Dundalk in terms of setting out their individual economic and employment profile, employment land potential and the strategic function and resource provided by the ports/harbour areas. In terms of Drogheda, the Assembly welcomes the recognition given to the employment areas in the southern environs of Drogheda, in particular the IDA Business and Technology Park along the Donore Road which is identified as a key component of the future cross boundary statutory Joint UAP with Meath County Council under RPO 4.11 of the RSES. The Assembly welcome the suite of individual policy objectives for each Regional Growth Centre which provide support at the local level of the RPOs set out in the RSES in particular around the Port Access Northern Cross Route, the Joint UAP, Dundalk IT (DkIT), the masterplan for Drogheda Port and regeneration of the Dundalk Port Harbour Area.

The Assembly also welcome policies EE 24, 25, 26 with respect to marine opportunities including ports set out in Section 5.10 and the recognition of significant opportunities they present including energy. The Council is directed to RPO 8.23 of the RSES which supports the protection of marine related

functions of the ports in the Region while also pointing to the potential opportunities around offshore renewable energy development and it is considered that the Council should include a reference to same within this section of the finalised plan.

The inclusion of the Rural Economy section at 5.19 is welcome, particularly with regards to the diversification of the rural economy and the support for rural enterprises. In this regard, the Local Authority are directed to related RSES policies for 'Rural Areas' contained at Chapter Four of the RSES and also those contained at Chapter 6 that relate to the 'Rural Economy'.

### Retail

The Assembly welcome the acknowledgement to national and regional policy set out in the NPF and RSES with regards to retail development and to the preparation of the Louth County Retail Strategy (Appendix 4) in accordance with the Retail Planning Guidelines and the Retail Design Manual (2012) and RPO 6.11 of the RSES. The Retail Strategy sets out the Retail Hierarchy for the County as presented in Table 5.2 and is in accordance with RPO 6.1 of the RSES, with Drogheda and Dundalk at Level 2 - Major Town Centres and County (Principal) Town Centres, and Level 3 Town and/or district centres; and sub-county town centres – Ardee; Drogheda District Centre: Matthew's Lane, Dundalk District Centres: Dublin Road and Ard Easmuinn.

A statement provided in the Retail Strategy accepts that it was prepared in late 2019 and early 2020 prior to the Covid-19 pandemic and acknowledges the deep and negative impact of the global pandemic on the retail sector in combination with the changing face of retail by the exponential growth of online shopping. The strategy further acknowledges that the long term impact will not be measurable for some time and that it is considered premature to attempt to capture such impacts within the retail strategy. Tables 5.3-5.5 of the plan sets out indicative convenience, comparison and bulky comparison floorspace requirements (including a consideration of existing vacancy) for County Louth for the years 2027 and 2030. The indicative floorspace requirements give a future indication of required additional floorspace for the county which is welcomed, however, given the current economic situation and changing face of retail it can only be considered as a very broad and tentative guideline on potential new floorspace requirements which should remain under review going forward.

The Assembly welcome that the Retail Strategy highlights the need that town centres in the county must become "destinations" where experience becomes as important as retailing in order to survive and prosper. The plan sets out a town centre approach to retail and supports the establishment of a Louth County Council led Town Centre Management Team for Drogheda and Dundalk through policy objectives EE 68 and EE 69 which is a welcome addition for the development of the Regional Growth Centres. It is noted that Section 5.24 of the plan supports the preparation and implementation of Town Centre Renewal Plans for Drogheda and Dundalk. It is recommended that the Council ensure that policy focus and priority be on town centre regeneration in combination with a mix of uses and this support for Town Centre Renewal Plans alongside a Placemaking Strategy for towns be included as policy objectives in accordance with RPO 6.12 of the RSES.

## **6. Tourism**

The inclusion of a stand-alone Tourism Chapter is a welcome addition to the Draft Plan. The RSES recognises the important role that tourism plays in County Louth, including as a Growth Enabler for the Core and Gateway Regions as identified at Section 3.2 of the RSES, as a means to enable and sustain the rural economy as per Section 4.8 of the RSES, and as a sectoral opportunity in particular experiential tourism along the Dublin-Belfast Economic Corridor (including Dundalk and Drogheda) as per Section 6.4 of the RSES.

It is considered that the content of the Tourism Chapter is reflective of the RSES, including the suite of related policies, namely RPOs 6.8 (Ireland's Ancient East), 6.15-6.18 and 6.21, that seek to enhance the Tourism Sector; and RPOs 6.21 (Drogheda as a Destination Town) and specifically RPOs 4.15 with reference to the Boyne Valley heritage sites and the amenity potential of the River Boyne including the Boyne Greenway. It is also considered that Section 6.3.1 on greenways could be strengthened through cross-referencing the information contained in chapters 7 and 8 relating to same.

## **7.0 Movement**

The Assembly welcomes this chapter of the draft plan which sets out the strategy for transport infrastructure provision and investment in the County and which coincides with Chapter 8 of RSES on Connectivity. The Assembly welcomes how the Council's transport strategy has been informed by national and regional strategies and the various planning policy guidance. The Council's approach to sustainable mobility through overarching policy MOV 1 is appropriate and aims to work with national transport agencies in supporting the delivery of a high quality, climate resilient and sustainable transport network for county Louth.

The Assembly welcomes Section 7.4 supporting the integrated approach to land use and transport planning which would benefit from reference to the Guiding Principles set out in Chapter 8 of the RSES that provides the basis for the integration of land use and transport planning in land use plans (RPO 8.1) and it is recommended that reference to same in policy objective MOV 2 would be appropriate for full policy alignment with the RSES.

The Assembly welcomes the emphasis placed on Section 7.5 Sustainable Transport and the analysis undertaken of current travel patterns which has highlighted the challenges facing the County and informed new policy to achieve more sustainable modes of transport and promote modal shift away from the private car. The suite of related policy objectives supporting decarbonisation of transport which pertain to electric vehicle infrastructure, car sharing infrastructure, and securing improvements and expansion to public transport infrastructure are welcome in addition to the commitment of the Council to the preparation of Local Transport Plans for both Drogheda and Dundalk (MOV 4) in accordance with RPO 8.6.

The Assembly welcome the policy objectives supporting engagement with the National Transport Authority and other agencies, that support the strategic rail projects including Dart Expansion Programme and high speed rail between Dublin and Belfast, bus services and improved park and ride and the overall focus to improve interregional and cross-border connectivity to and from the two

Regional Growth Centres of Drogheda and Dundalk. In addition, the suite of policy objectives promoting cycling and walking in combination with the network of greenways in the County will support the shift to active and more efficient transport modes, particularly given that cycling modal share in the County is low. With regards to the provision of additional rail stations in the county (MOV 14), noting Ardee, and feasibility of same, the focus should be on ensuring sustainable transport mobility in the higher order settlements, particularly the Regional Growth Centres of Drogheda and Dundalk. In this regard, the Council is directed to the transport investment priorities for rail and road projects for the region which are set out in Section 8.4 of the RSES and which have secured investment under Project Ireland 2040 – National Development Plan.

The Assembly welcome the policy supports for strategic road projects including the Drogheda Port Access Northern Cross Route (RPO 4.12) and the national road projects for the county as listed in Table 8.4 of the RSES. The Council is also directed to RPO 8.11 which supports the improvement, and protection of the EU TEN-T network and the strategic function of the Dublin to Belfast road network of which it is part and to ensure consistency it is considered that recognition of the EU TEN-T network be referenced in the plan.

## **8. Natural Heritage, Biodiversity and Green Infrastructure**

The Assembly welcome the Council's commitment to conservation and enhancement of natural heritage and recognising the role it plays along with green infrastructure and biodiversity and this is demonstrated by the suite of policy objectives protecting and enhancing natural heritage, biodiversity value, ecological networks and protected sites. It is considered that the array of topics is reflective and supportive of the content of the RSES Chapter 7.

It is noted that the policy objectives NBG 7 and NBG 28 with respect to co-operation with the Assembly and adjoining local authorities both north and south of the border in a transboundary environmental context is particularly welcome. In addition, the Council's dedication to protection of trees, woodlands and hedgerows of special amenity value and of amenity areas in general as expressed in sections 8.10 and 8.11 are especially considerate and commendable.

The Assembly welcomes Louth's Green Infrastructure Strategy as presented in Section 8.13.3 and the accompanying suite of policy objectives, particularly those that support a collaborative Regional Green Infrastructure approach (NBG 52), the preparation of green infrastructure strategies with the focus on permeability and the 'greening' of key streets for the Regional Growth Centres of Drogheda and Dundalk (NBG 45, 46, 56). In terms of green infrastructure strategies, the RSES provides a suite of guiding principles that local authorities should follow and the Council is thereby directed to Section 7.7 of the RSES.

The Assembly welcome and acknowledge the ecosystem services approach as part of the vision of the whole plan as stated in section 1.7.5.1 and to be achieved through Strategic Objective SO 6 aligning with RPO 7.21. It is considered that the chapter would benefit from a cross reference to the overall importance of the ecosystem services approach and the strategic objective be reaffirmed within this chapter of the plan for consistency.

## **9. Built Heritage and Culture**

The inclusion of this chapter with regard to the Built Heritage of County Louth is welcome. In finalising this Chapter, the Council should consult with Section 9.7 of the Draft Plan. It is considered that the policies and objectives of the Draft Plan are in keeping with same, including for instance, dealing with UNESCO World Heritage Sites such as Bru Na Boinne as outlined in policy objectives BHC 9, 10, 11, 12, 13, 14 aligning with RPOs 4.15 and 9.29 of the RSES. The Assembly also welcome the policy objectives that support the sensitive reuse of protected structures and heritage led regeneration generally in accordance with RPOs 9.27 and 9.30.

## **10. Utilities**

The inclusion of this chapter is in keeping with Chapter 10 of the RSES. The Assembly welcomes the acknowledgement that the sustainable growth of the county is dependent on the provision of adequate water and waste water services and infrastructure. The Council is directed to RPO 4.2 of the RSES in this regard, and the Assembly welcome policy objectives IU 2, 3, 4 and 5 which promotes co-operation with Irish Water and in the implementation and delivery of their relevant investment works programmes in order to provide infrastructure to service settlements and which also supports water conservation.

The importance of Flood Risk Management and Sustainable Drainage Systems (SuDs) and the suite of policy objectives are acknowledged. In the use of SuDs detailed measures should also be incorporated into the forthcoming local area plans with a focus on enhancing biodiversity, amenity and the protection of environmentally sensitive sites, in accordance with RPO 7.15 of the RSES.

The attention of the Council is brought to RPO 7.43 advising local authorities to consider the identification of all Critical Infrastructure (CI) within their functional areas, and particularly of the interdependencies between different types of sectoral infrastructure, as a first step in 'future-proofing' services and to help to inform longer term adaptation planning and investment priorities.

The Assembly welcome supportive policy objectives with regards to the National Broadband Plan in accordance with RPOs 8.25 and 8.26 of the RSES. The Assembly in particular welcome the comprehensive approach taken by the Council in terms of focusing on the range of new and developing technologies around renewable energies and the suite of dedicated supportive policy objectives, including those for wind energy and offshore renewables. Prior to the finalisation of the Draft Plan including all related policy and objectives, it is recommended that the Council have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in December 2019, which are expected to be finalised in the near future.

The collective and collaborative approach to the provision of all-island renewable energy is noted alongside the Council's support to identify, with EMRA, Strategic Energy Zones as areas suitable to accommodate large energy generating projects within the Eastern and Midland's region, aligning with RPO 7.35 of the RSES.

## **11. Environment, Natural Resources and the Coast**

The Assembly welcome the approach of the Council to the conservation and enhancement of the County's environment, natural environment and the coast, and in particular natural resources such as Forestry and the promotion of carbon sequestration (ENV 39). In addition, the importance of Louth's coastline is emphasised in terms of its natural and economic functions including its port activity. The Assembly welcome the suite of policy objectives on coastal management including those that respond to new national marine spatial planning policy. It is recommended that the Council make a cross over reference to the Draft National Marine Planning Framework in this chapter as per Section 5.10 on marine opportunities.

In terms of coastal resilience, the attention of the Council is drawn to Integrated Coastal Zone Management (ICZM) supported by RPO 7.3 of the RSES, as a coherent policy for the sustainable management of all aspects of the coastal zone.

## **12. Climate Action**

The Assembly welcomes the Council's approach to climate action with the aim of transitioning to a low carbon and climate resilient County through a combination of mitigation and adaptation measures in response to climate change. The Assembly also welcomes and acknowledges the Climate Action Charter for Louth which was signed in 2019 and which will play its part in guiding communities, businesses and developers to a more sustainable and climate resilient future.

The chapter provides a very comprehensive overview of international legislation, national, regional and local policy context including reference to the 6 Regional Strategic Outcomes related to the key principle of Climate Action as set out in the RSES. In addition to the RSOs the Council acknowledges 5 RPOs for local level climate change policies to be consistent with, however it is not clear which particular RPO's the Council is referring to and it is requested that these are clarified for consistency and alignment with the RSES. It is considered that there a number of relevant RPOs relevant to Climate Action including RPOs 3.6, 3.7 and those contained at Chapter 7 of the RSES, which may assist the Council.

The Council's attention is also drawn to RPO 3.6 and the preceding paragraphs of the RSES which outline the requirement of Development Plans to assess their impact on carbon reduction targets. The Assembly note a statement under 12.7.1 which states that the Strategic Environmental Assessment (SEA) includes an analysis of the impact of land use zoning on carbon reduction targets. The SEA has considered the impact of alternative land use zonings on carbon reduction targets, however the environmental report's analysis and overall conclusion on carbon reduction is in the form of a generalised statement. The analysis does not include specific reduction figures around this, however, the general consideration of same is welcome. It should also be noted that EMRA is leading an ESPON EU research project (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which are anticipated in 2021, and which should assist the Council further in this area as it progresses.

The Assembly further welcomes how climate action mitigation and adaptation strategies have been integrated into the policies of the draft plan and this is demonstrated through the Council's overarching climate action strategic objectives set out in Section 12.6. In addition Table 12.1 sets out how the plan policy objectives respond to and aim to address the Climate Action Plan 2019 targets with regards to Electricity, Built environment, Transport, Agriculture, Forestry and land use and Enterprise.

The Assembly highlights the work of the Eastern and Midland Climate Action Regional Office who will continue to assist local authorities in implementing their climate action strategies and provide guidance to inform potential measures, policies and regulatory tools in the preparation of the Draft Development Plans. It is understood that the forthcoming Development Plan Guidelines will provide similar guidance in this area.

The attention of the Council is also brought to the Climate Action Fund made available under the Department of Communications, Climate Action and Environment, and, in order to be availed of, requires policy support. In this regard, the Council may wish to identify potential projects as part of the finalised Plan.

### **13. Development Management Guidelines**

This section of the Draft Plan provides a comprehensive set of development standards and land use zoning objectives to be applied in the assessment of planning applications.

### **14. Implementation and Monitoring**

The Assembly welcome the inclusion of the Monitoring and Implementation section which sets out the legislative background to implementation, the significance of the urban area plans and local area plans, sources of potential funding and delivery of the 2 year review which will report on the progress achieved in securing the objectives in accordance with Section 15 of the Planning and Development Act 2000 (as amended).

### **15. Settlement Plans**

The inclusion of the numerous plans for the various settlements throughout the County is a welcome addition to the Draft Plan. The Assembly recognises the clear and evident detailed work that has gone into preparing the numerous plans. This comprises a suite of policies applicable to each settlement, the identification of context/character, opportunities, and development policy objectives across a range of themes including Settlement and Housing, Economy and Employment, Tourism, Infrastructure, Movement, Natural and Built Heritage, Urban Design and Public Realm.

## **16. SEA, AA and SFRA**

The Draft Plan is subject to Strategic Environmental Assessment (SEA) and an environmental report has recorded the process to date. Section 8.8 Detailed Evaluation indicates that there are no probable conflicts with the status of SEOs that are unlikely to be mitigated. Section 8.3 Overall Evaluation states that taking into account, inter alia, the detailed mitigation which has been integrated into the Plan (including that which is identified in Section 9), it has been determined that significant residual adverse environmental effects will not occur in either Ireland or Northern Ireland.

The Assembly note Section 8.4 of the SEA which refers the inclusion of 3 no. Members motions (Table 8.3) as part of the Environmental Report, which details motions that were advised against inclusion in the Draft Plan. The Assembly request that a clear rationale be provided for the inclusion of same as part of the finalised Plan, and to omit these where there is potential for significant negative environmental effects.

The Draft Plan is subject to Appropriate Assessment and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. Implementation of the Draft Plan has the potential to result in effects to the integrity of any European Site, if unmitigated. Having incorporated mitigation measures, the NIR concludes that the Draft Louth County Development Plan 2021-2027 is not foreseen to give rise to any significant effects on designated European Sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated. The AA process is ongoing and will inform and be concluded at the adoption of the Plan.

The Draft plan is also subject to Strategic Flood Risk Assessment (SFRA). The SFRA highlights that central areas that are affected by flood risk have been targeted for growth including the Regional Growth Centres of Drogheda and Dundalk. To allow the sustainable and compact development of these urban centres along with other settlements in the hierarchy, development in areas of flood risk may be considered necessary. The SFRA further cautions that for development in such areas to be allowed, the Justification Test must be passed. In this regard the Assembly emphasise that the Council follow the provisions outlined under RPOs 7.12, 7.13 and 7.14 relating to the support of Flood Risk Measures identified in the CFRAM Flood Risk Management Plans, the sequential approach to development set out in the 2009 Department Guidelines on Planning and Flood Risk Management and the inclusion of Sustainable Drainage Systems (SuDS). In particular the Council are directed to the recommendations set out in the SFRA relating to Flood Risk Management for Drogheda and Dundalk and the potential for joint studies for e.g. in the case of the cross boundary statutory UAP for Drogheda between Louth and Meath County Councils.

## **17. Other**

It is considered that the final plan would benefit from general cross referencing across the chapters and specifically in the areas as presented above.

## **Conclusion**

It is considered that the Draft Louth County Development Plan, and in particular the Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the Draft Louth County Development Plan 2021-2027, which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and The Assembly welcome further opportunities to engage in the statutory process of the making of the Louth County Development Plan.

Regards,

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Jim Conway  
Director  
Eastern and Midland Regional Assembly  
11<sup>th</sup> December 2020