



18th December 2020

Senior Executive Officer,
Forward Planning Section,
Louth County Council,
Millennium Centre,
County Hall,
Dundalk,
Co. Louth,
A91 KFW6

Re:

Submission towards the Draft Louth County Development Plan 2021-2027

on behalf of

Ballymakenny Developments Ltd.

Dear Sirs,

We act on behalf of Ballymakenny Developments Ltd., who are owners of lands at Commons & Greenbatter, north Drogheda. This submission is being put forward in response to the public display and the public notice regarding the Planning Authority's intention to make a new County Development Plan. We wish to support the Council's proposal to zone our client's lands the proposed objective 'A2 New Residential' upon the adoption of the new Louth County Development Plan (hereafter CDP) for the period 2021-2027. Our detailed comments are set out below and we request that they be taken into consideration in the preparation of the new CDP.

1. Introduction

Ballymakenny Developments Ltd. are the owner of lands located north of Drogheda town centre and Forest Park residential estate, east of Ballymakenny Road, north-east of Ballymakenny College secondary school, and west of the Dublin to Belfast rail line, view Fig. 1 below. Our client's lands are currently zoned 'North Drogheda Environs Plan' which permits residential development in Drogheda, the County's Primary Development Centre, as designated in the Settlement Hierarchy of the current County Development Plan 2015-2021.

The CDP 2015-2021 stated that following the making of the new CDP 2021-2027, a programme for the preparation of the Local Area Plans (LAPs) will commence and that a LAP will be prepared for Drogheda, including North Drogheda. Under the current CDP 2015-2021, a new LAP for Drogheda has not been prepared, therefore the relevant Plan pertaining to the subject site remains the 2004 North Drogheda Environs Local Area Plan. This LAP was updated by way of variation to include a Core Strategy in line with the adopted CDP at that time. As such, in terms of land use zoning, the subject site retains that zoning objective "to provide for residential use in accordance with approved Masterplan".

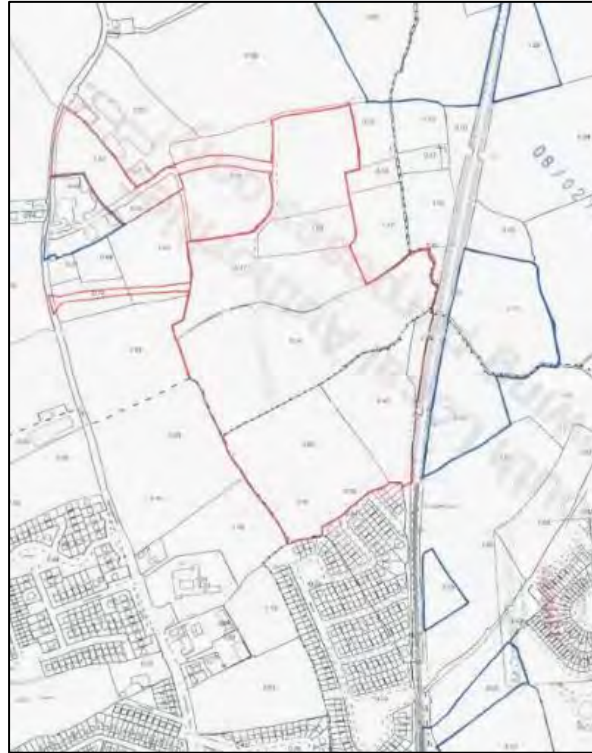


Fig. 1 – Location of subject lands outlined in red

Our client's lands have the benefit of planning permission for a residential development for c. 599 no. dwellings, 3.74ha of public open space, all associated infrastructure and site development works including internal roads, bin and bicycle storage, etc. Our client's lands form part of the previously permitted residential development under Louth County Council Reg. Ref. No. 08/274. Permission for the aforementioned was granted for a period of ten years on 14th October 2008, under Reg. Ref. No. 08/274. Permission was subsequently granted for an extension of duration of the aforementioned planning permission for a period of five years until 13th November 2023, under Reg. Ref. No. 18/872. A commencement notice in relation to the carrying out of the permitted development was submitted to Louth County Council (hereafter LCC) on 22nd October 2018 with a commencement date of 5th November 2018 on same, under Ref. 45594LH. Works are currently ongoing on these lands.

2. Planning Context and Location of Subject Lands:

Our client's lands are located within the designated borough boundary of Drogheda, Co. Louth, as per the North Drogheda Environs Local Area Plan 2004. In 2004, the Council prepared a LAP for the Northern Environs of Drogheda which provided for the phased development of three new neighbourhoods capable of accommodating an additional population of 20,000 inhabitants. A detailed master plan for the area was prepared in 2006 and adopted by the Council as a variation of the LAP. The subject lands were zoned 'to provide for residential use in accordance with approved Master Plans' in the LAP and were located in the designated 'Residential Neighbourhood Two' in the subsequent North Drogheda Environs Masterplan, 2006, view Fig. 2 below.

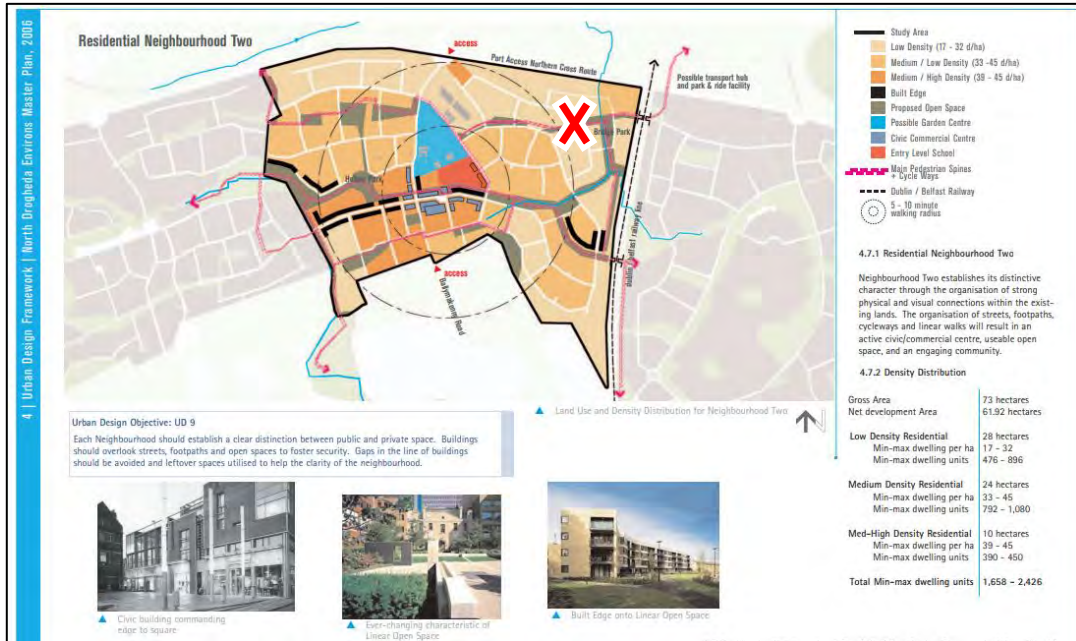


Fig. 2: Residential Neighbourhood Two, North Drogheda Environs Masterplan, subject site location identified with a red 'X'

The current CDP 2015-2021 placed the land use zoning objective 'North Drogheda Environs Plan' on our clients lands and place the lands within the settlement boundary of Drogheda, view Fig. 3 below.

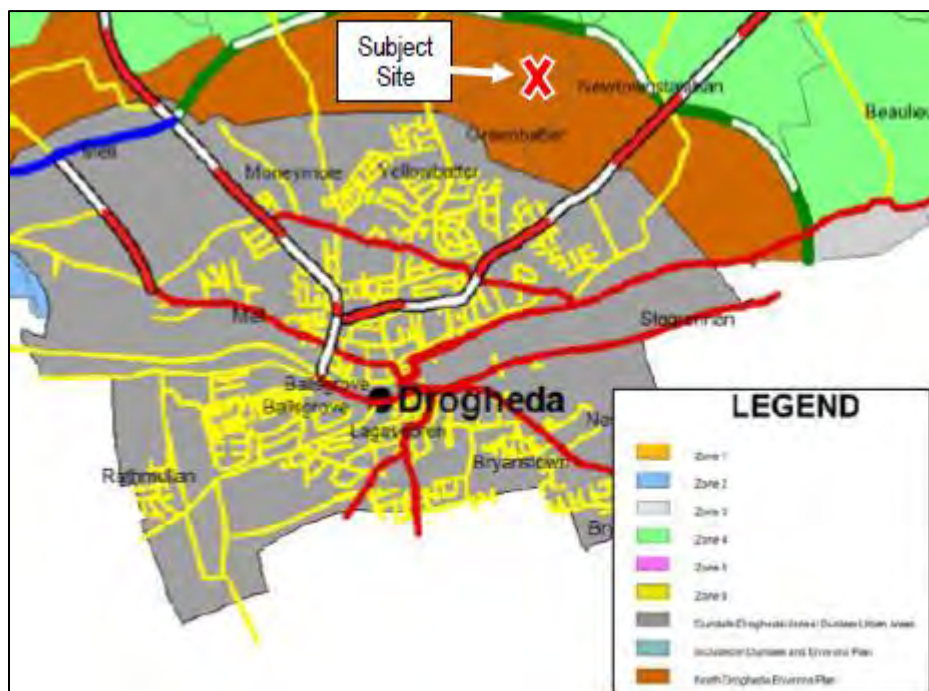


Fig. 3: Identification of site, marked with a red 'X', within North Drogheda Environs Plan (Source: Louth County Development Plan 2015-2021, Development Zones Map 3.1)

Following the adoption of the Louth County Development Plan 2021-2027, the Council plans to review the respective development plan for the urban area of Drogheda and ultimately replace the same by a LAP. The local area plan for Drogheda will be sub-set of and will be consistent with the provisions of the CDP 2021-2027. Section 2.13.1 of the draft CDP notes that, in line with objective of the RSES, a Joint Urban Area Plan (hereafter UAP/LAP) for Drogheda will be prepared between Louth and Meath County Councils. This UAP/LAP will be informed by the strategic objectives set out in this draft CDP 2021-2027 and will provide



for specific objectives and key actions to unlock the full potential of Drogheda as a Regional Growth Centre.

Subject Lands

The subject lands are located within the 'A2 New Residential' are as identified in Fig. 4. of the draft CDP with an objective which aims 'to provide for new residential neighbourhoods and supporting community facilities'. The proposed zoning of the subject lands ties in with National Policy Objectives as set out in the 2018 National Planning Framework which is the Government's high-level strategic plan for shaping the future growth and development of the country out to the year 2040. A key element of the NPF's strategy is compact growth with one of the key features being "targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas". The zoning of our clients lands in the north Drogheda environs area complies with this requirement.

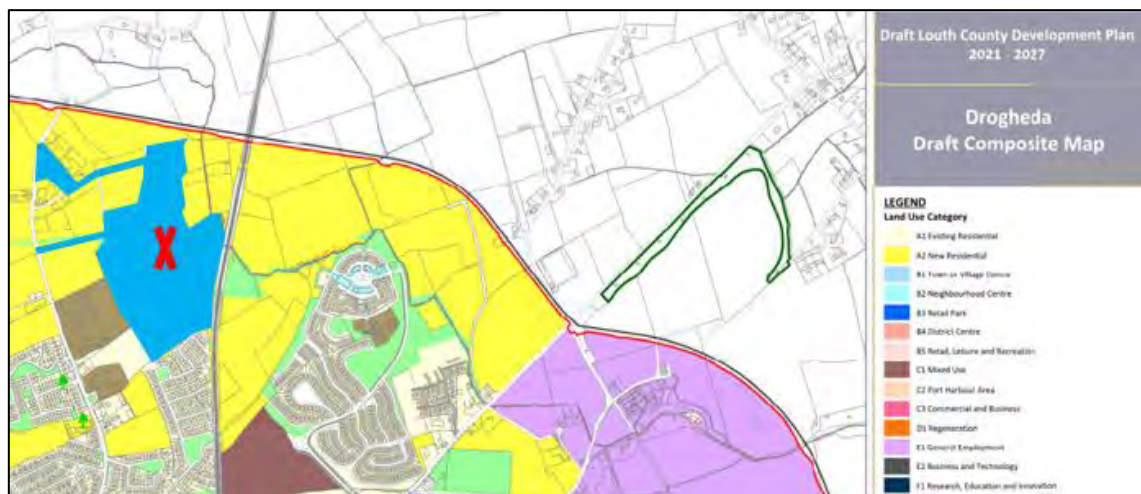


Fig. 4: Subject site identified in blue, marked with 'X'

The National Planning Framework sets out a number of objectives that promote coordinated spatial planning and sustainable use of resources and protection of the environment which include inter alia:

- National Policy Objective 3a - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements;
- National Policy Objective 4 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being;
- National Policy Objective 32 - To target the delivery of 550,000 additional households to 2040;
- National Policy Objective 33 - Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

It is put forward that the zoning of the subject lands objective 'A2 New Residential' would result in the delivery of an appropriate density of development of modern and adaptable new homes, within an area in close proximity to existing local service provision and public transport infrastructure, and would consolidate housing development to the south.

The proposed zoning of the subject lands also accords with Rebuilding Ireland – Action Plan for Housing and Homelessness, 2016, which is the Government's Action Plan for Housing and Homelessness. The overarching aim of the Action Plan is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs.

The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the Action Plan which states that: "locating housing in



the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while delivering on sustainability objectives related to efficiency in service delivery and investment provision". The zoning of the subject lands in close proximity to existing residential areas and employment opportunities which is in line with the provisions of the Action Plan.

The Action Plan contains five key pillars of which Pillar 3 is most relevant in this instance. Upon the zoning of the subject lands objective 'A2 New Residential', future residential development of same would be consistent with Pillar 3 to 'Build More Homes', as the lands could comfortably cater for housing on a greenfield site that enjoys close proximity to a wide range of facilities and services i.e. "*Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices*".

The 2019-2031 Regional Spatial and Economic Strategy (hereafter RSES) for the Eastern and Midland Region labels Drogheda as a "*Regional Growth Centre*" which are described as "*large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.*" The RSES state the aim to enable the town to act as a regional driver, with a focus on improving local economy and quality of life to attract investment and the preparation of urban area plans. Drogheda is to realise its potential to grow to city scale and secure investment to become a self-sustaining Regional Growth Centre on the Dublin-Belfast Economic Corridor, driving synergies between the Drogheda - Dundalk - Newry cross border network. The RSES asserts "*the vision for Drogheda for both to reach a target population in the region of 50,000 by 2031.*" (Emphasis added by Armstrong Fenton Associates)

Our client wishes to support the Council's proposed zoning objective and state that this zoning is appropriate given the historical planning policy and strategic approach and zoning of the lands, the current housing demand and the advantages the subject lands have with the existing planning permission, existing infrastructure and services already available to the site. The surrounding area of Drogheda, south of the subject site, has been primarily developed for residential purposes, mainly in the form of semi-detached housing.

3. Strategic Planning Considerations

Our client's lands the lands have the benefit of planning permission as part of the above permitted residential development for c. 599 no. dwellings, 3.74ha of public open space, all associated infrastructure and site development works including internal roads, bin and bicycle storage, etc. The subject site forms part of the previously permitted residential development under Louth County Council Reg. Ref. No. 08/274. Permission for the aforementioned was granted for a period of ten years on 14th October 2008, under Reg. Ref. No. 08/274. Permission was subsequently granted for an extension of duration for the aforementioned planning permission for a period of five years until 13th November 2023, under Reg. Ref. No. 18/872. Construction has subsequently commenced on site and works continue and are on-going.

As a result, the proposed zoning of the lands for 'A2-New Residential' use, continues the planning policy support which has been in existence as far back as 2004 the provision of residential development in this location in north Drogheda. We note that the lands to the immediate west, north and east of our clients' site is currently proposed to be zoned objective 'A2-New Residential' use and we, in agreement with the proposal, consider that this zoning enables the logical extension of Drogheda in line previous planning policy objectives and adopted regional and national policy objectives.

3.1 Draft Core Strategy

The town of Drogheda, in line with the policy objectives set out in the RSES and NPF, is designated as a '*Regional Growth Centre*' in the Core Strategy of the draft CDP 2021-2027. The policies and objectives of the Core Strategy propose that the town of Drogheda will prioritise the targeted population and economic growth to city scale, with a target population of 50,000 to be reached by 2031 (Emphasis added by Armstrong Fenton Associates). In line with national and regional policy, the draft CDP aims to capitalise on the strategic



location of Drogheda along the Dublin-Belfast Economic Corridor, to drive linkages and synergies between the north and south of Ireland.

The Core Strategy of the draft Louth CDP, in line with population projections and growth allocations set out in the RSES, set a limit on new residential development in Drogheda over the plan period for 3,043 no. residential units, view highlighted Table 2.14 of the Core Strategy below:

Table 2.14: Core Strategy Table

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L
Settlement Category	Settlement	Population 2016	Projected Population Increase to 2027	Projected Population 2027	Total Projected Housing Stock 2027	Total Additional Housing Units 2016-2027	Approx. Units Completed 2016-2020	Housing Allocation 2021-2027	Lands with potential to deliver Infill or Brownfield Development (ha)	Units delivered on Infill/Brownfield Lands	Total Lands Zoned for New Residential uses (ha)
County	Louth	128,884	21,082	149,966	61,717	10,318	2,040	8,278	110.4	4,302	589
Regional Growth Centre	Drogheda	34,199	6,914	41,113	17,184	3,443	400	3,043	34.8	1,725	213
	Dundalk	39,004	7,660	46,664	19,892	3,541	935	2,606	30	1,743	269

Section 2.6.6 of the CDP states that ‘an overriding objective of both the NPF and the RSES is the need to achieve ambitious targets for compact growth in urban areas. Louth is required to deliver at least 30% of all new homes within existing built up footprints (NPO 3c)’. Our client submits that should this approach be applied to the allocation in Drogheda, with 30% of allocated units provided on brownfield / infill sites with the built up area of the town, this would leave a housing allocation of only circa 2,130 no. units for permission in the North Drogheda environs area.

Our clients’ supports the proposed zoning of the their lands, which have commenced construction and which will enable the consolidation of residential development in Drogheda in a sustainable manner by assisting accommodating the projected population growth planned for Drogheda through the Plan period. However, it is submitted that there is currently permission granted for circa 4,000 no. units in the wider North Drogheda environs area. Should the majority of the extant permissions commence development, the limitation of housing allocation to circa 2,130 no. units for plan period to the North Drogheda environs area would seriously limit the number of new permissions which may be brought forward for permission.

It is our submission that the projected allocation is too low when reviewed against the extant permissions and the targets of the RSES and NPF. We believe that Louth County Council should be setting a more ambitious growth target given Drogheda’s strategic location, port facilities, transport links, broadband access, extensive serviced employments lands and support at both regional and national planning policy. It is submitted that reference and wording is included to ensure there is sufficient land available to facilitate population growth and economic development based on its designation as a Regional Growth Centre for the plan period and beyond.

In relation to the matter of phasing of developments, our client notes that the Council recommends in Section 2.13.6 of the CDP ‘a requirement for a phased approach to be taken to the development of the Northern Environs in accordance with with the phasing arrangements set out in the 2006 Master Plan or any subsequent Master Plan prepared for the area.’ Our client acknowledges the requirement for phased development of lands linked to the provision of roads, new streetscapes, pedestrian and cycle networks and water services infrastructure which will allow the Council to manage the phased release of the lands. However, we submit to the Council that the phasing arrangements set out in the 2006 Master Plan are out of date, are overly prescriptive and provide little flexibility to developers.

Restricting residential development to the phasing arrangements set out in the 2006 Master Plan will inhibit the population growth targets set out in the RSES and NPF. Our client acknowledges that as part of the UAP / LAP process a more detailed examination of zoned lands will be carried out jointly by Louth and Meath County Councils after the adoption of the draft CDP. It is submitted to the Council that restricting the phasing of future development in the interim between now and adoption of the future UAP / LAP to the phasing arrangements set out in the 2006 Master Plan are overly prescriptive and are contrary to the aim of the RSES Growth Strategy which seek to ensure that Drogheda realises its potential to grow to city scale and secure investment to become a self-sustaining Regional Growth Centre on the Dublin Belfast Economic



Corridor.

It is submitted that specific reference to the *'requirement for a phased approach to be taken to the development of the Northern Environs in accordance with the phasing arrangements set out in the 2006 Master Plan'* in Section 2.13.6 of the draft CDP be removed. It is submitted that inclusion of such wording is too prescriptive and impacts on the deliverability of lands over the plan period.

3.2 Open Space

Our client notes that an area of public open space has been defined zoned H1 running east/west through their residentially zoned lands, view Fig. 5 below. This corresponds with the alignment of a linear park, and the area coincides with a 2006 design for the linear park approved under a planning permission which has now expired. This alignment is too prescriptive, and it should be removed. Changing part of the site from A2 to H1 puts unnecessary constraints on designers who may seek to reroute the linear park to more optimal alignments. Having part of an application site zoned H1 and not for residential use could impact on whether a development can be considered Strategic Housing Development.

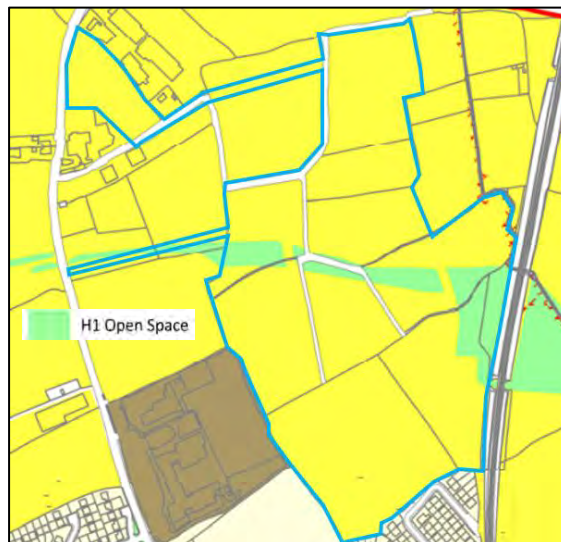


Fig. 5: Open Space Use set out on client's lands (outlined in blue)

3.3 Summary

Ballymakenny Developments Ltd. support Louth County Council's proposed zoning of their lands in the draft CDP 2021-2027. This accords with National and Regional policies and objectives to grow Drogheda as a Regional Growth Centre. We therefore support the plans of the Planning Department and elected members of Louth County Council in zoning the subject lands for residential development. Their location and proximity to necessary and existing services, facilities, transport routes and employment centres and access to meaningful and necessary physical infrastructure provides the most rational and logical approach to the future of these lands.

Our client expresses concern with and requests the removal of wording listed above, that has the potential to impact the deliverability of extant permissions and future development in the North Drogheda environs area over the plan period. The inclusion of such a limit on allocations of residential units below the number of units permitted in the extant permissions for northern Drogheda in tandem with references in Section 2.13.6 to restrict development to the phasing arrangements set out in the 2006 Master Plan would be contrary to the objectives of the RSES, Rebuilding Ireland and Government Policy as it would negatively impact on the pace of delivery of housing in a Regional Growth Centre in the midst of a well-documented housing crises.



4. Merits for Zoning Client's subject lands

- The subject site had commenced construction on the permitted planning permission (Reg. Ref. No. 08/274, a permission which was subsequently granted an extension of duration for a period of five years until 13th November 2023, under Reg. Ref. No. 18/872).
- By zoning the subject lands for residential land use, and subsequently delivering housing on same will result in the creation of a compact urban form by consolidating existing development boundaries and utilising pre-existing services, which is preferable to expanding urban areas into the countryside.
- It is submitted that a logical and rational approach to future planning in Drogheda is to zone our clients' lands for residential development given the planning permission granted on these lands, the commenced works on site, their proximity to the town centre, neighbouring existing residential zoned lands and existing physical infrastructure.
- By zoning the subject lands, this will allow for the delivery of much need housing within the period of the new County Development Plan as upon the zoning of same, there are no planning or infrastructural impediments to the delivery of housing, thus contributing to the quantum of housing as envisaged by the Core Strategy within the lifetime of the new CDP 2021-2027.

5. Conclusion

We support the Council's proposal to zone our clients land to the north of Drogheda for residential land use as part of and upon the adoption of the Louth County Development Plan 2021-2027. The location of the lands directly adjacent to and bounding existing residential development will allow for the overall consolidation of lands in northern Drogheda for residential development and concentrate such land uses in an area that can be realistically serviced by adequate and available physical infrastructure.

We ask the elected members of Louth County Council to support the proposed zoning of the subject lands for residential development. The extant permission, the lands location and access to meaningful and necessary physical and social infrastructure provides the most rational and logical progression for the future development of the town. The zoning of the subject lands for residential use will enable Drogheda to cater for the projected growth set out in the Core Strategy and Regional Spatial and Economic Strategy in this plan period and will assist the Council in the delivery of residential units on some of the proposed '*A2 New Residential*' lands.

Throughout this submission we have sought to highlight the importance of the need for a coordinated and strategic approach for the subject lands for their zoning as '*A2 New Residential*' for the following reasons:

- The presence of adequate infrastructural services for the subject lands, such as roads / access and drainage with adequate capacity for future development, further enhances the suitability of zoning the subject lands for residential purposes.
- The subject lands are directly adjacent to lands zoned for and developed for existing residential use; therefore the designation of these lands for residential development will be in line with the proper planning and sustainable development of the area and will consolidate the overall area in north Drogheda.



- As per the granted permission on the subject lands, the zoning of these lands for residential use will not negatively impact on the character of the area.
- It is proposed that these lands be zoned as '*A2 New Residential*' to be included in the new Louth County Development Plan 2021-2027.
- It is submitted that specific reference to the '*requirement for a phased approach to be taken to the development of the Northern Environs in accordance with the phasing arrangements set out in the 2006 Master Plan*' in Section 2.13.6 of the draft CDP be removed. It is submitted that inclusion of such wording is too prescriptive and impacts on the deliverability of lands over the plan period.
- It is submitted that the inclusion of land use zoning objective '*H1*' on our clients lands be removed and changed to '*A2*' as changing part of the site from A2 to H1 puts unnecessary constraints on designers who may seek to reroute the linear park to more optimal alignments. It is submitted that inclusion of such wording is too prescriptive and impacts on the deliverability of lands over the plan period.

We hope that the Louth County Council takes on board the states support for our clients' lands to be zoned as '*A2 New Residential*' as part of the newly adopted County Development Plan 2021-2027. Trusting all of the above is in order.