

An aerial photograph of a residential area in Drogheda, Co. Louth, Ireland. The image shows a river flowing through the center, with a bridge on the left. A large, irregularly shaped plot of land is highlighted with a red dashed border. This plot is mostly cleared and appears to be a site for development. The surrounding area is densely packed with residential houses and green spaces. The text and logo are overlaid on the right side of the image.

PLANNING SUBMISSION

LANDS AT
MARSH ROAD,
DROGHEDA,
CO LOUTH



PLANNING SUBMISSION

Louth County Development Plan 2021-2027

PREPARED BY:

Genesis Planning Consultants
Planning and Urban Design

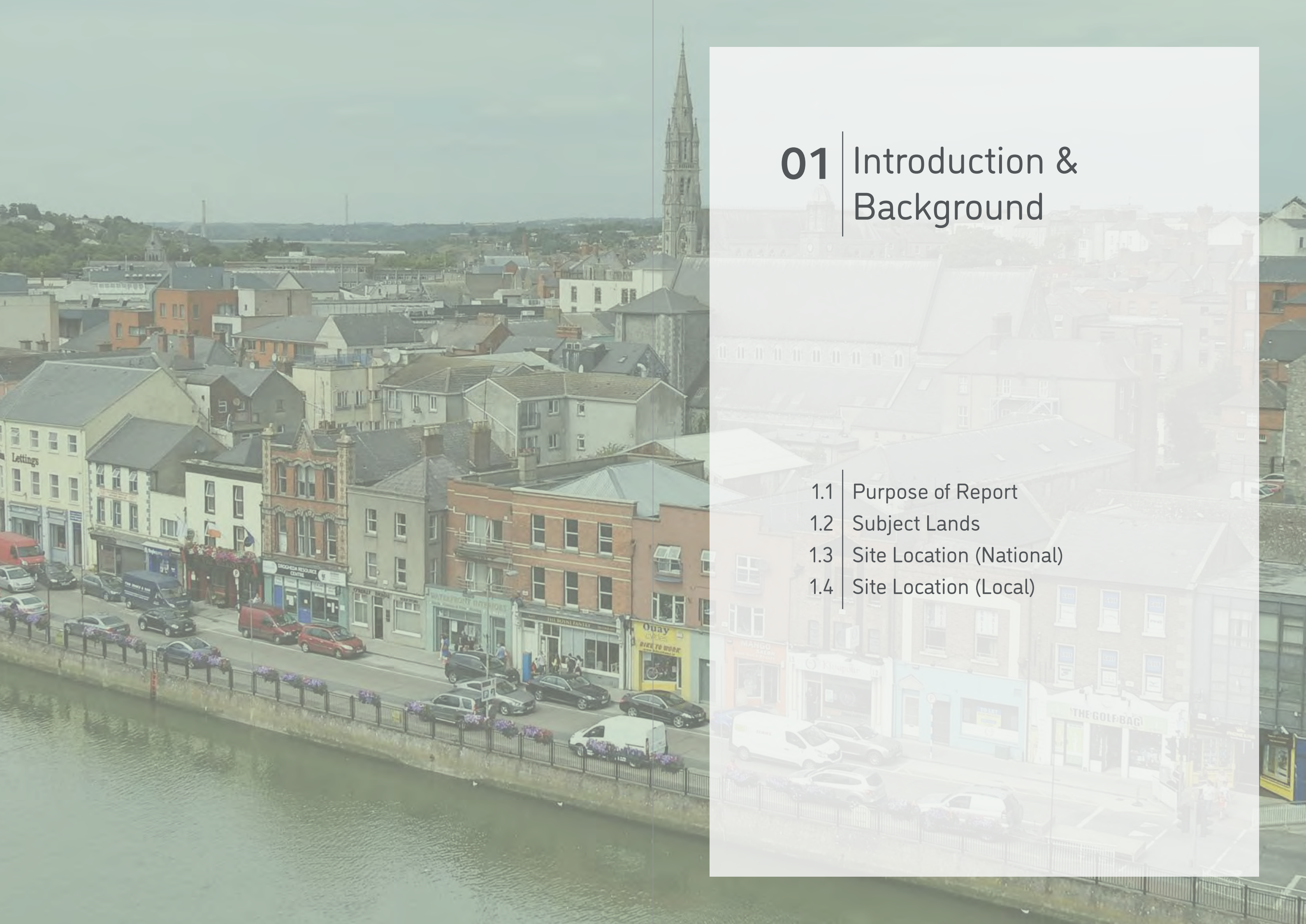
ON BEHALF OF:

PJ & EJ Doherty Ltd.



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01 Introduction & Background

- 1.1 Purpose of Report
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01 Introduction & Background

1.1 Purpose of Report

The Planning Authority is commencing the preparation of the County Development Plan (CDP) for the county to cover the period 2021 to 2027. The purpose of the CDP is to set out an overall strategy for the proper planning and sustainable development of the county.

Genesis Planning have been engaged by PJ & EJ Doherty Ltd. to examine and assess the existing policy context in Drogheda and to prepare this submission to the Planning Authority on their behalf.

In terms of background our client is in ownership of the subject lands in the Marsh Road/ Bryanstown area of Drogheda, and is currently examining options for moving the lands forward for development.

In preparing this submission we have undertaken an analysis of our client's lands in the context of the National Planning Framework, the RSES, the current Louth CDP 2015-2021 and the Drogheda Borough Council Development Plan 2011-2017.

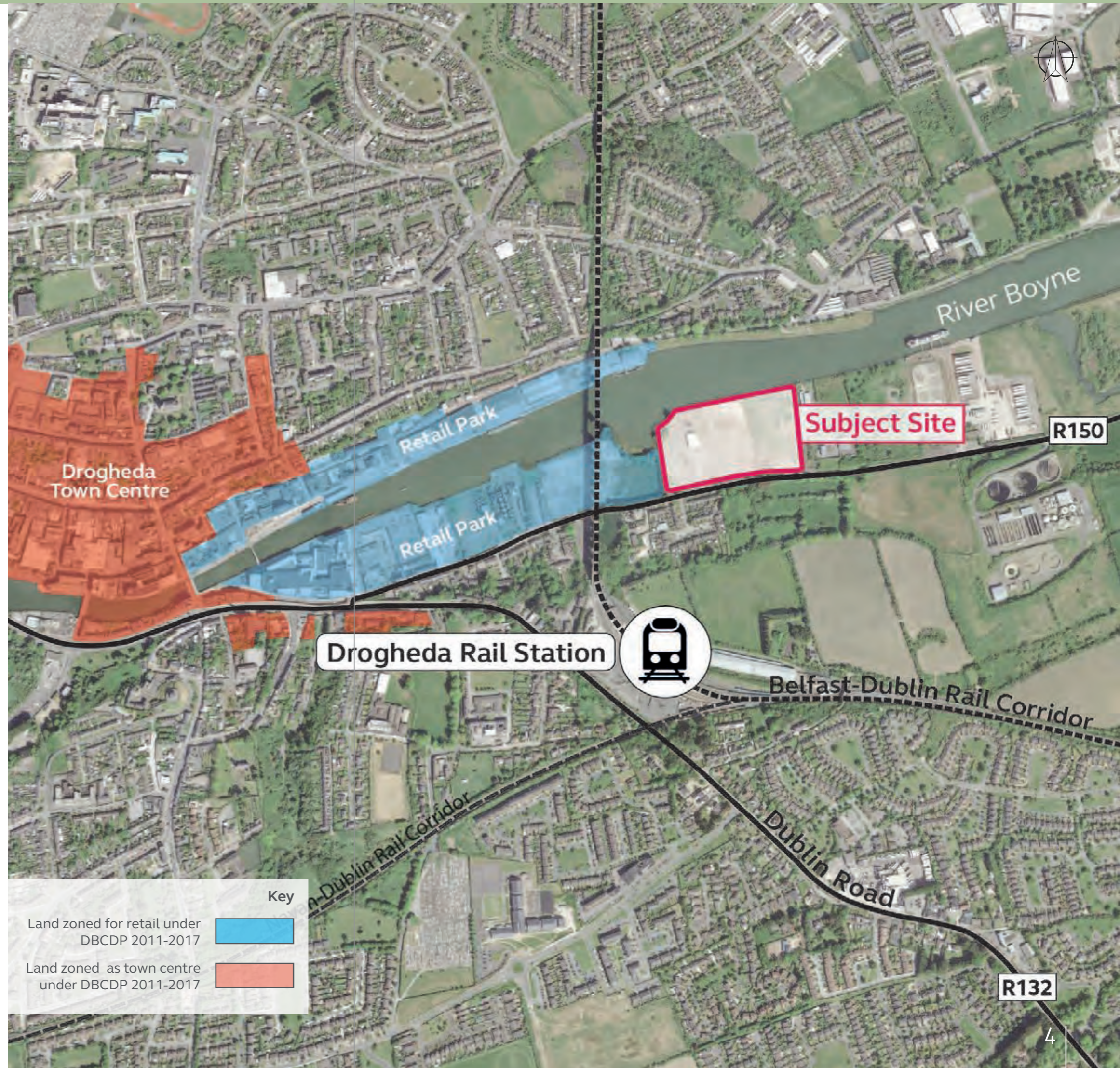
The analysis undertaken by Genesis Planning identified a number of areas of interest which demonstrate that the subject lands are suitable for residential development.

1.2 Subject Lands

In totality the subject lands occupy approximately 4.7ha along Marsh Road (R150) in the Bryanstown area of Drogheda, approximately 1.5km east of what would be considered Drogheda Town Centre. The northern boundary of the site is defined by the River Boyne, occupying approximately 300m of the Rivers southern bank.

We submit the subject site would provide a suitable location for a residential development.

This submission outlines the planning rationale for the subject lands to be included as zoned residential in the forthcoming CDP.



01 Introduction & Background

1.3 Site Location: National

The site is located within the regional growth town of Drogheda - the fastest growing town in the Country during the most recent intercensus period (RSES). In terms of zoning the site is located to the east of the town centre on zoned lands that currently permit employment generating development.

In terms of local demographic context, Drogheda has a population of circa 40,000, with a target of being a regional driver of city scale with a population of 50,000 by 2031.

With regards to the socio-economic context, there are a large number of multi-national companies across a wide range of sectors located in Drogheda, and in conjunction with the economic growth of the town, there has been a steady increase in the local population over the past couple of decades.

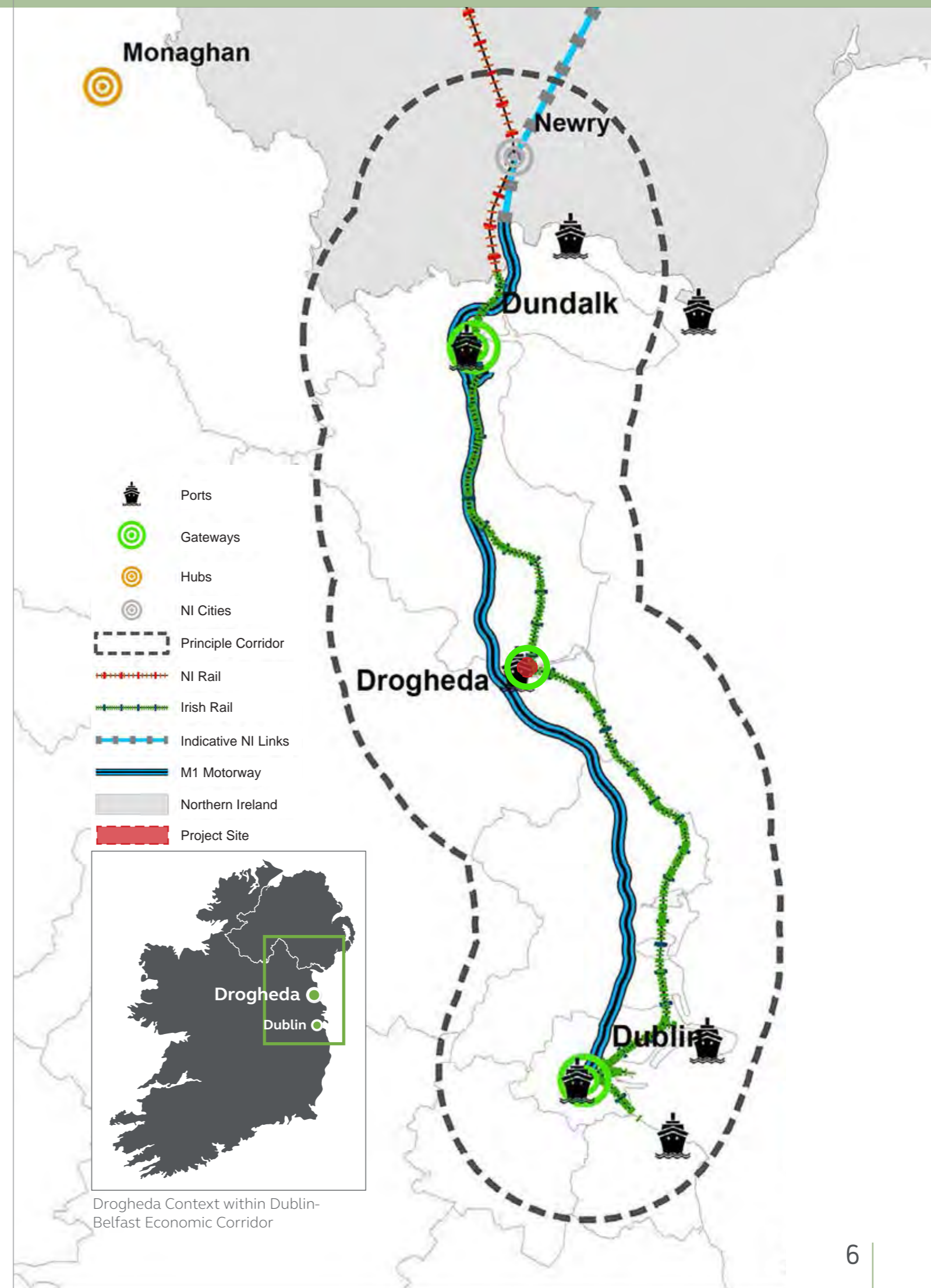
As the Planning Authority will note under the NPF, Drogheda is prioritised as a cross-border network settlement and is targeted for growth and investment in respect of the Dublin-Belfast economic corridor. The NPF reaffirms the ambition for Drogheda to grow to city scale.

Key to the success of Drogheda as a self-sustaining regional growth centre is targeted compact growth through the renewal and regeneration of underused, vacant and/or derelict town centre lands for residential and commercial development.

The DART extension programme will also see significant infrastructure investment in the nearby MacBride Train Station. Therefore given the proximate location of the site to the town centre, the train station, as well as areas zoned for employment purposes, the subject lands provide an ideal location for residential development.



Drogheda is recognised in the RSES as a regional growth centre with ambitions to reach city-scale.



Drogheda Context within Dublin-Belfast Economic Corridor

01 Introduction & Background

1.4 Site Location: Local

The subject lands comprise approximately 4.7ha which are strategically located east of Drogheda Town Centre, on the southern bank of the River Boyne.

The remainder of the site is bound by Marsh Road to the south (from which there are multiple existing access points), open undeveloped land to the west and Inver Colpa Rowing Club to the east.

There are a number of structures existing on the site, mainly warehouse/storage buildings which are currently vacant. The residual area of the site remains undeveloped with the exception of ESB and eircom poles.

In terms of immediate location and connections, Marsh Road connects Drogheda Town Centre with Mornington and Donacarney and runs on an east-west axis parallel to the River Boyne.

The lands are also close to Drogheda Train Station, Drogheda Port, Drogheda Town Centre and less than 5km from junctions 8, 9 and 10 of the M1 Corridor. The existing Weirhope Bus Stop on the south east boundary of the site is served by frequent bus services to and from the town centre. The lands also have existing pedestrian access to the town centre along Marsh Road

Being immediately adjacent to the River Boyne, we note there are a number of environmental designations located to the north of the subject lands associated with the river including:

- Boyne Coast and Estuary SAC
- River Boyne and Blackwater SAC
- Boyne Estuary SPA

Overall the site enjoys good road frontage with the R150 forming the southern boundary of the site, as well as significant frontage along the River which is a huge asset.

With services already existing on site as well as direct access at multiple points along the R150 we submit this site should be prioritised for residential development in the forthcoming CDP.



02 | Policy

- 2.1 National Policy Context
- 2.2 Regional Policy Context
- 2.3 Local Policy Context

2.1 National Policy Context

The National Planning Framework 2040 sets out the importance of development within existing urban areas, and sets out strategic objectives which Planning Authorities are to have regard to.

Under the NPF Drogheda is recognised as a regional growth centre in the context of the Dublin-Belfast corridor, and being of importance due to its links with Dundalk and Newry. Drogheda is to be targeted for growth and investment as a key driver for the border region.

Key policies of the NPF in this regard 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.’ (p. 35)



Furthermore, we highlight a number of objectives contained within the NPF which relate to the subject lands, such as:

- **Objective 2b** ‘The regional roles of... Drogheda-Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy.’
- **Objective 3a** ‘To deliver at least 40% of all homes nationally within the built-up footprint of existing urban settlements.’
- **Objective 3b** ‘Deliver at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs, within their existing built-up footprints.’
- **Objective 4** states to ‘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.’
- **Objective 5** ‘To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity.’
- **Objective 6** ‘Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.’

- **Objective 7** ‘Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:
 - Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on... Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;
 - Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities’; and
 - ‘Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth.’
 - In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.’
- **Objective 11** ‘In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.’
- **Objective 13** states ‘In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.’
- **Objective 35** states ‘Increase residential density in settlements through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.’
- **Objective 44** states ‘In co-operation with relevant Departments in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility.’



Extract from NPF relating to the Dublin to Belfast Eastern Economic Corridor

Summary

We submit that the subject lands are appropriate for residential zoning as envisaged by the NPF given:

- The subject lands are serviced; under the tiered approach set out in the NPF these lands should therefore be prioritized under the development plan process.
- Objectives 2b, 3a, 3b, 4, 5, 6, 7, 11, 13, 35 and 44 of the NPF are complied with.
- The lands are in close proximity to the town centre, MacBride train station, and a number of significant employment centres.
- The development would see significant regeneration of a brownfield, infill site along the Boyne waterfront.
- The subject lands are sequentially acceptable, contiguous to existing developed lands and in close proximity to the urban core of Drogheda.



Extract from RSES for EMRA relating to the Functional Urban Areas and Large Towns CSO 2016

2.2 Regional Policy Context

The RSES for the Eastern and Midland Region (EMRA) sets out the strategic plan and investment framework aimed to *‘shape future development and to better manage regional planning and economic development throughout the Region.’*

In line with the NPF, Drogheda is recognised by the Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES2018) as a regional growth centre and a regional driver with *‘significant sustainable growth potential’.*

The policy for the Dublin-Belfast corridor encourages focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale, with both having been identified for significant population growth to achieve a population in the region of 50,000 by 2031.

In this context Drogheda is also identified as one of the key settlements that is critical to the success of both the RSES and NPF. It is recognised by the RSES that regional drivers:

‘will accommodate significant new investment in housing, transport and employment generating activity. They are important self-sustaining centres that act as economic drivers for the Region, capitalising on their strategic location and high-quality connections to Dublin, while also servicing and supporting a wider local economy.’

In terms of the development strategy outlined in the RSES, in relation to Drogheda it echoes the NPF in that it states:

- ‘Facilitate collaboration to support the development of the Dublin-Belfast Economic Corridor, to drive synergy in the Drogheda-Dundalk-Newry cross border network.’
- ‘Compact and focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale.’

- Target significant growth in the Regional Growth Centres of Athlone, Drogheda and Dundalk to enable them to act as regional drivers, with a focus on improving local economies and quality of life to attract investment and the preparation of urban area plans.

- *‘Drogheda 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.’*

- ‘Safeguard and improve accessibility and service by rail, road and communication between Dublin and Belfast and drive cross border networks between Drogheda, Dundalk and Newry. Post-Brexit, consideration should be given to a process that can establish protocols for environmental protection and movement of people and goods.’

- ‘Facilitate the regeneration of lands at MacBride Station to capitalise on existing and planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.’

- Also specific objectives relative to Drogheda in the RSES include RPO’s 4.11 to 4.18, 4.20, 6.3, 6.30, 8.6, 8.8, 8.11, 8.12 and 8.22.

Summary

As the subject lands are strategically positioned within the settlement boundary of Drogheda, the zoning of the subject lands for residential development is consistent with the objectives set down by the RSES. The subject lands will improve the supply of residential units for Drogheda in a sustainable manner, facilitating compact and focused growth, consolidation of the urban area as well as brownfield, infill and waterfront regeneration.

2.3 Local Policy Context

The current Louth CDP sets out the strategic land use objectives and policies for the overall development of the county up to the year 2021, acting as a guide for those interested in pursuing development and to inform development proposals.

In terms of settlement hierarchy, under the current CDP Drogheda has been identified as a Level 1 – Large Growth Town, specifically it states:

‘Over the last decade, the town has experienced significant growth principally resulting from its location close to Dublin, the completion of the motorway and improvements to rail commuter services.

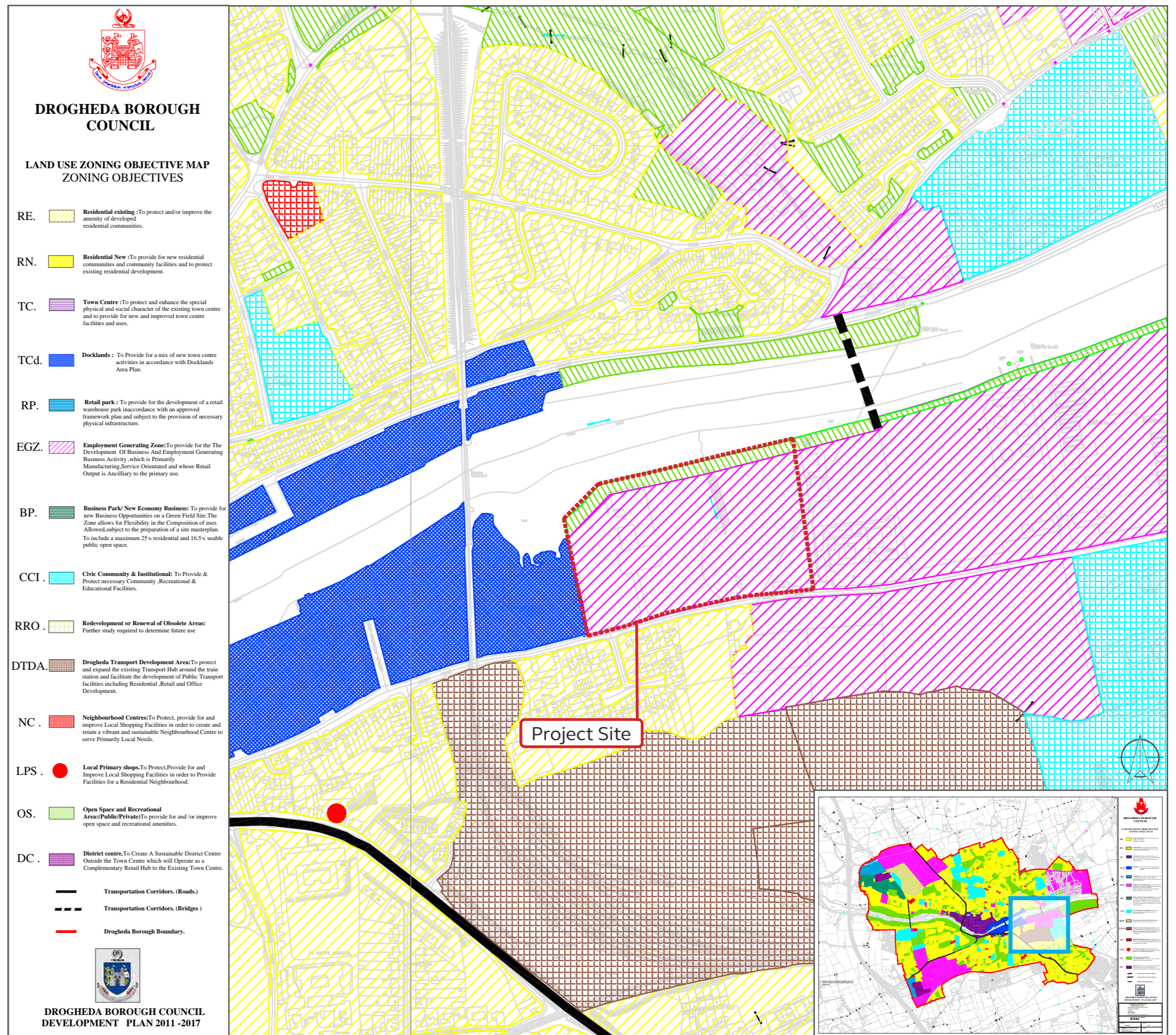
While acknowledging Drogheda’s role as a commuter town, the Council is keen to support the policies and objectives of the Drogheda Borough Council Development Plan, particularly having regard to the objective of developing the town as a self-sustaining Primary Development Centre that will energise development within its own catchment.’

In terms of current zoning, the provisions contained within the CDP accord with the Drogheda Borough Council Development Plan (2011-2017; as extended).

The subject lands are designated in the DBCDP 2011-2017 as ‘EGZ’ (Employment Generating Zone) and ‘OS’ (Open Space & Recreational). The zoning objectives of both designations can be seen opposite.

Summary

With existing residential development located immediately south of the subject site (Weirhope Housing Estate) and an application for 456 units around MacBride Station as part of DTDA (deemed acceptable by the Bord and Planning Authority), we submit the subject lands are suitable for a residential development and should be zoned accordingly in the upcoming CDP.





03 | Local Context

- 3.1 Site Context
- 3.2 Local Connections
- 3.3 Sequential Development
- 3.4 Residential Zoning
- 3.5 Proposed Zoning
(As Per Draft 2021-2027 CDP)
- 3.6 Recommended Zoning
- 3.7 Proposed Zoning & Context

03 Local Context & Concept

3.1 Site Context

The subject lands are located north of Marsh Road in the Bryanstown area east of Drogheda Town Centre, in close proximity to the Irish Rail Corridor, Drogheda Viaduct and MacBride train station.

Consisting of a brownfield parcel of lands measuring a total 4.7 hectares, the site borders open undeveloped lands along its western boundary, the River Boyne to the north, Inver Colpa Rowing Club along the eastern boundary and Marsh Road (R150) to the south.

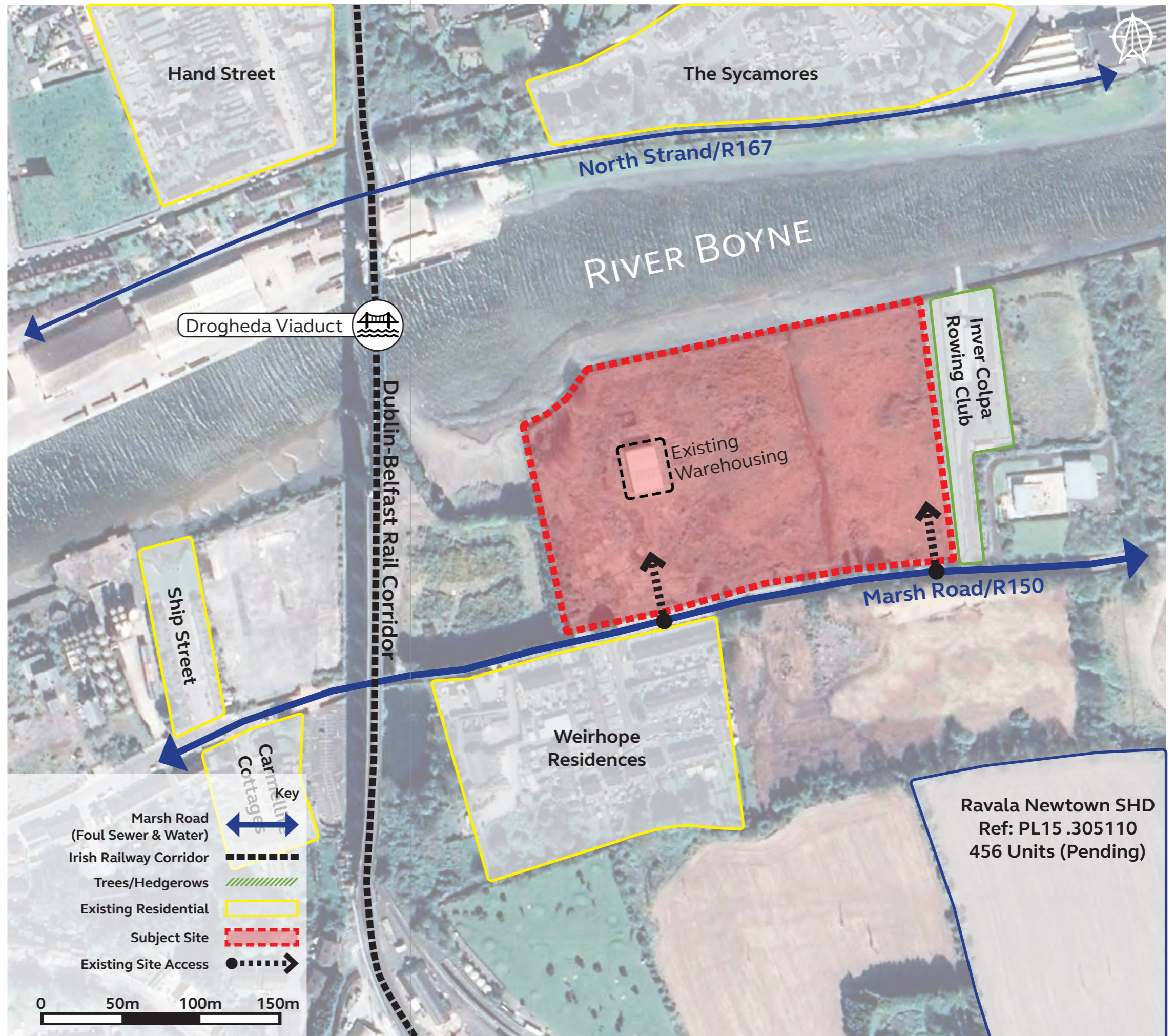
Of relevance to the local context is the Ravala Newtown SHD which has been subject to a judicial review challenge located to the south-east of the subject lands. Although permission has not been granted, we note the location and principle for Ravala SHD has been deemed acceptable by the both the Planning Authority and the board.

In terms of existing site features, multiple access points to the site already exist from Marsh Road along the southern boundary, characterised by entrance railings and mature trees in places.

Existing site conditions are characterised by relatively flat lands with some existing unused warehousing located in the eastern section of the site.

There are existing views of the site from the immediate stretches of Marsh Road (R150), from adjacent residential properties in Weirhope as well as from the Boyne river and portions of the north strand on the opposite site of the river.

Overall the site benefits from its location on the river front, its proximity to Drogheda Town Centre (one of the fastest growing towns in the state), as well as its proximity to significant public transport infrastructure (MacBride Train Station, Weirhope Bus Stops) and existing utility services along Marsh Road (R150)



03 Local Context & Concept

3.2 Local Connections

Marsh Road, which forms the primary road frontage of the site, connects Drogheda town centre with Mornington and Donacorney and runs on an east-west axis parallel to the River Boyne.

The site is within easy walking distance of Drogheda town centre and therefore has access to all of the social infrastructure facilities of the town core. In the immediate area the site enjoys good access to schools at both primary and secondary level.

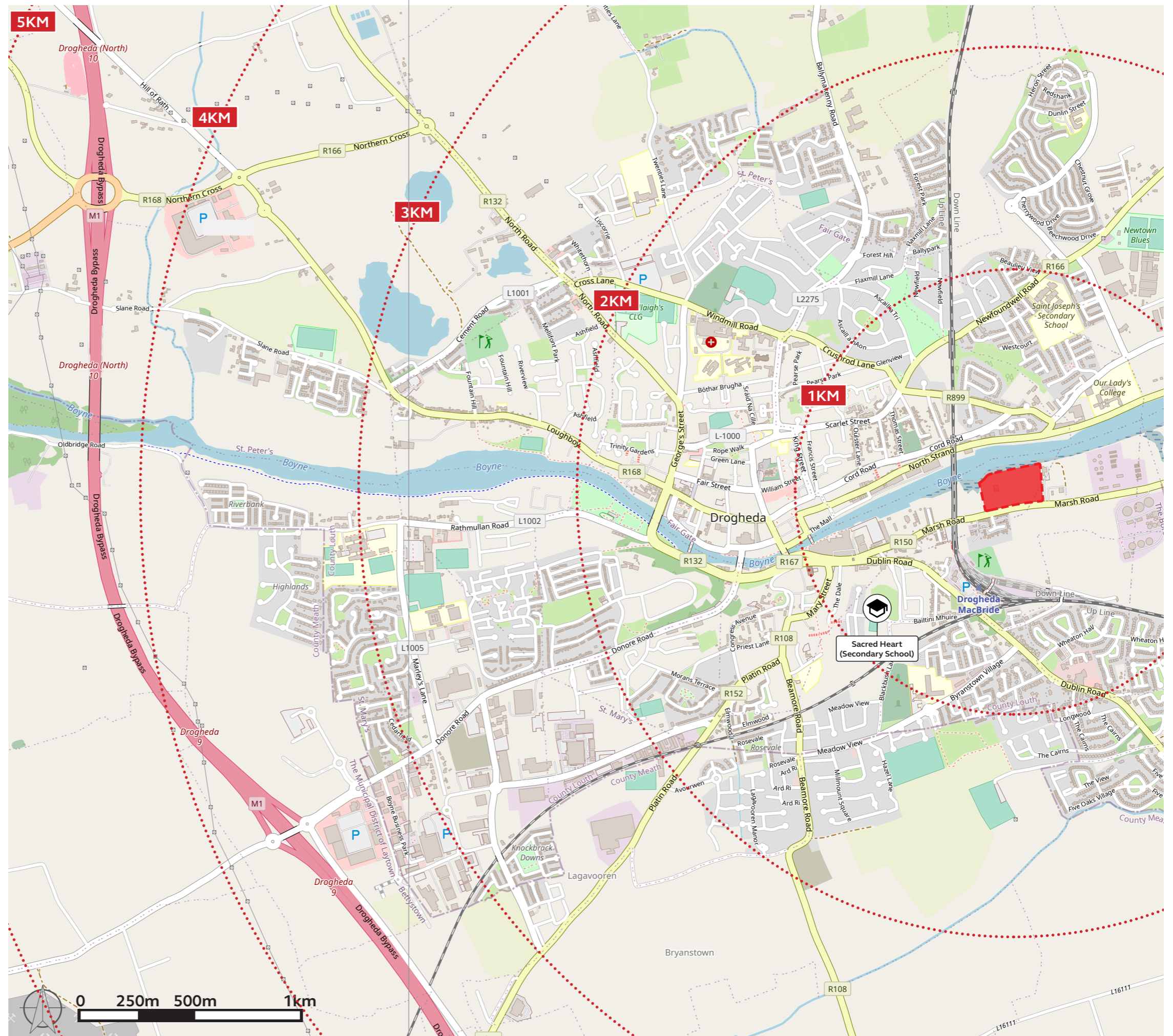
Drogheda grammar school is located on Mornington Road, approx. 2km east of the site, and which also shares it's site with Le Cheile primary school. Also, An Bhradain Feasa, a gael-scoil, is located on mill road 2km south-east of the subject lands. The sacred heart secondary school is located 1.1km from the site via poorhouse lane. On these basis the site is well served by local schools.

With regards to public infrastructure and service provision, MacBride train station is located approximately 300m from the project boundary.

Of relevance we also note the RSES has also confirmed the DART (Dublin Area Rapid Transit) will be extended to Drogheda (para. 5.6).

Local bus services can also be accessed close by with Weirhope bus stops located on the southern boundary, operating at 15min frequency to the town centre and beyond via the D1 and D2 services.

In terms of road access, junctions 8 and 9 of the motorway (M1) are less than 4km from the subject site and can be readily accessed via Donore Road (Junction 9) or Platin Road (junction 8).



03 Local Context & Concept

3.3 Sequential Development

The merits of the sequential approach in land use planning are well established. In this regard, as the Planning Authority will note, the development of land for residential purposes is influenced by multiple factors such as services, availability, accessibility and existing infrastructure.

In response we submit the subject lands are an example of why the sequential test should examine each site in detail and not just look at it's location.

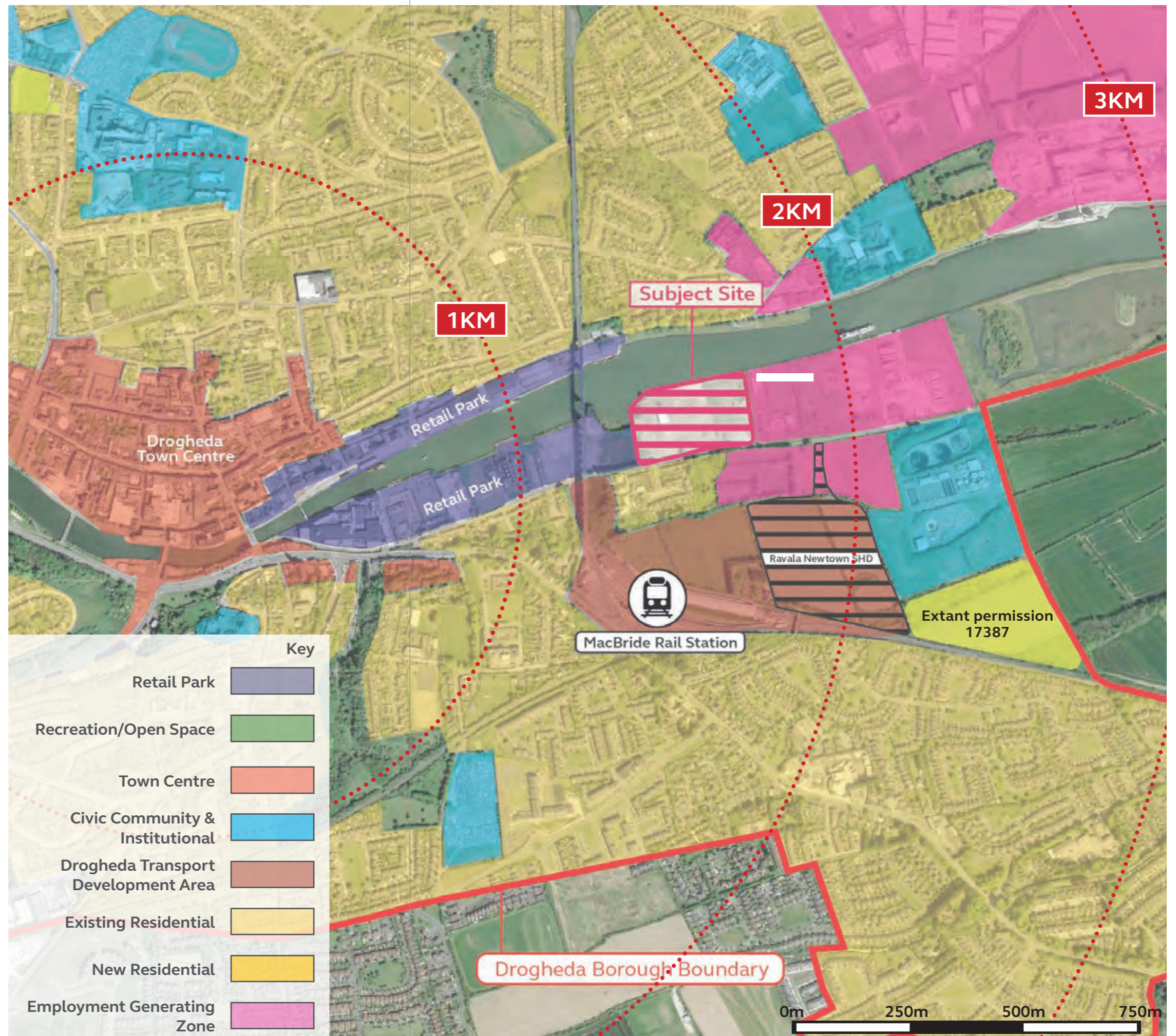
We also highlight the sequential approach is required under the NPF; specifically under appendix 3 therein which seeks to prioritise 'Tier 1: Serviced Zoned Land'.

In response we highlight the site is appropriate in terms of sequential development given:

- The site is to be categorised as 'Tier 1 Service Zoned Land' as per the NPF and should therefore be prioritised for residential development.
- The site directly accessible from the existing road infrastructure.
- The site is serviced.
- The site is included within the settlement boundary of Drogheda, in close proximity to the town centre.
- The site is within walking and cycling distance of local amenities and major public transport infrastructure.
- The site is sequentially the next available parcel of lands for residential development and also represents brownfield infill development as well as waterfront regeneration.

We submit these attributes make these lands strategically important in the overall development of Drogheda.

Delivery of a residential scheme via an appropriate land use zoning on these lands should therefore be supported by the Planning Authority in advance of many other land parcels elsewhere in Drogheda.



03 Local Context & Concept

3.4 Residential Zoning

Population Change

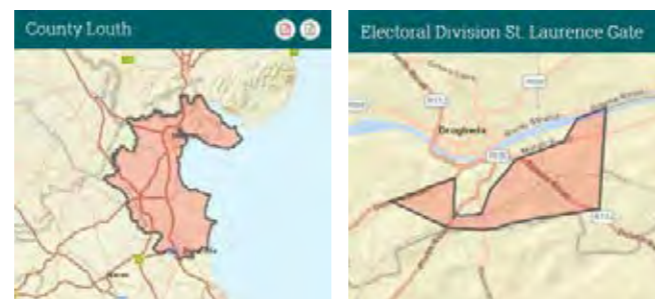
To provide an overview for the Planning Authority in terms of local population change and demand for housing, this section provides a brief outline of the population growth of the State, the Greater Dublin Area (GDA), Co Louth, Drogheda & Environs and also St. Laurence Gate ED (where the site is located) according to the CSO census data.

As can be noted from table 1 below, the population of County Louth grew by 39.8% between 1996 and 2016. Also, Drogheda & Environs has grown substantially between 1996-2016, from 25,282 in 1996 to 40,956 in 2016, representing a population increase of 62%.

At a more local level St. Laurence Gate ED (where the subject lands are located), has grown by 18.8% from 1996 to 2016.

On this basis the population growth experienced both at County Level and in Drogheda all exceed the growth in the state (31.3%) and the GDA (37.5%) during the same period.

However we note growth in the St. Laurence Gate ED fell below all of the above-mentioned rates at 18.8% in the period from 1996-2016. Specifically when considering the growth rate of County Louth (39.8%) and Drogheda & Environs. (62% - almost double that of the national average) over the same period, this suggests a gross under-supply of residential development in this central area of the town.



Census Year	State	Greater Dublin Area	Co. Louth	Drogheda & Environs	St. Laurence Gate
1996	3,636,087	1,405,671	92,166	25,282	3,423
2002	3,917,203	1,535,446	101,802	31,020	3,566
% Change	8.0%	9.2%	10.5%	22.7%	4.2%
2006	4,239,848	1,662,536	111,267	35,090	3,801
% Change	8.2%	8.3%	10%	13.1%	6.6%
2011	4,588,252	1,804,156	122,897	38,578	4,004
% Change	8.2%	8.5%	10.45%	9.9%	5.3%
2016	4,761,86	1,907,332	128,884	40,956	4,068
% Change	3.8%	5.7%	4.87%	6.2%	1.6%

Table 1: Population change of the State, the Greater Dublin Area, Louth and Drogheda & Environs and St. Laurence Gate ED between 1996 and 2016 as derived from the CSO statistics

Housing Market

As the Planning Authority will note, the housing market in Drogheda has shown significant growth in recent years, influenced by its own population, economic growth and also by the overall demands being exerted for housing units both in County Louth and in the Greater Dublin Area.

On review and as set out in Table 1, we consider it is reasonable to assume this represents the natural growth of Louth's population and the ongoing demand to live within commuting distance of Dublin City and along key transport corridors.

Also, as is evident in relevant publications and statistics, there remains significant pressure on the housing market in the Drogheda and Environs area, with Drogheda being a more affordable and accessible alternative to living in Dublin City.

However, on review of CSO data for new dwelling completions it is noted that units constructed in recent years within County Louth still remains low, particularly for apartment unit provision.

In terms of residential prices, the median price in the Drogheda eircode area was €249,795 (June 2020), which is growth of 192% since the trough in April 2012 of €129,495.

Notably this growth in prices of 192% is greater than that experienced in County Dublin where prices have increased by 69.9% (excluding Dublin City Centre where growth has been 94.2% since the trough).

It is clear these increases in prices are reflective of the existing demand to live in the Drogheda area, both from local buyers and from those whose first preference would be to live in Dublin but due to affordability issues they seek to reside in commuter towns such as Drogheda.

Also, in terms of transactions data from the CSO for 2020 it shows that 34 market transactions took place in Drogheda (up to July 2020), with an average sale price of €248,554. On review, when compared to average Dublin 1 sale prices of €351,667 for July 2020 it is evident Drogheda is a much more affordable housing option for purchasers. Further, we note market evidence suggests in the price range of €210,000 to €240,000 potential demand is at its strongest, particularly for three-bedroom units.

Summary

It is submitted the current lack of availability of units is demonstrative of a shortage of supply and there exists a clear need to provide additional residential units which are appropriate both in terms of unit mix and affordability.

Louth	2017 Q3	2017 Q4	2018 Q1	2018 Q2	2018 Q3	2018 Q4	2019 Q1	2019 Q2	2019 Q3	2019 Q4	2020 Q1	2020 Q2	2020 Q3
Single House	31	29	24	30	37	46	28	28	37	35	27	19	37
Scheme House	81	86	96	107	97	124	127	98	109	117	85	155	105
Apartment	2	5	5	16	2	15	19	9	14	52	2	14	7

Table 2: New dwelling completions in Louth, Type of Unit and Quarter (source: CSO)

03 Local Context & Concept

3.4 Residential Zoning

Vacancy Rate

Table 3 below shows the housing type and vacancy rate in County Louth, St. Laurence Gate ED and the state respectively as per CSO data in 2016.

On review it is noted the percentage of vacant dwellings at County Level is extremely constrained with 88.57% of units occupied and within St. Laurence Gate ED it is 92.00%. This is extremely high in comparison to the state figure of 85.22% which demonstrates that both County Louth and St. Laurence Gate ED have a lower rate of available units than the remainder of the country.

Also, with ongoing population growth trends evident from census figures this occupancy rate has increased in recent years as Drogheda is now classified as a rent pressure zone.

Further, at a county level it is noted from recent figures that the vacancy rate in Louth is now recorded at an extremely low rate of 3.7%.

Further, our analysis has found that in terms of existing apartment numbers it is noted that apartments form a low overall percentage of the housing mix within the county at only 4.6% of the total residential stock.

On the basis of the above it is clear there is a need for more residential units to be provided to accommodate the growing population within County Louth and Drogheda & Environs, in particular for apartment units.

We consider this is reflected in the designation of County Louth as a rent pressure zone since July 2019, which in turn correlates with market evidence that a higher vacancy rate is required to avoid excessive increases in rents or purchase prices and ensure a housing market functions efficiently.

	Louth County Permanent Dwellings	Louth County %	St. Laurence Gate ED Permanent Dwellings	St. Laurence Gate ED %	State Permanent Dwellings	State %
Occupied	45,528	88.57%	1,529	92.00%	1,707,453	85.22%
Temporarily Absent	1,158	2.25%	35	2.10%	50,732	2.53%
Unoccupied Holiday Homes	761	1.48%	0	0.00%	62,148	3.10%
Other Vacant Dwellings	3,952	7.68%	98	5.90%	183,312	9.15%
Total	51,399	100%	1,662	100%	2,003,645	100%

Table 3: Occupancy Rates of Existing Units



Vacancy Rate of Housing Stock by County (geodirectory.ie)



Apartment Units as a % of Housing Stock (geodirectory.ie)

Summary

- With Drogheda recognised as a regional growth centre in the context of a Dublin-Belfast corridor (to be targeted for growth and investment as a key driver for the border region), we submit that the delivery of residential scheme on the lands is consistent with the strategy and objectives as set out in the NPF.
- As the subject lands are strategically positioned within the settlement boundary of Drogheda, the proposed development is consistent with the objectives set down by the RSES in that it will improve the supply of residential units for Drogheda in a sustainable manner, facilitating compact and focused growth through the consolidation of the urban area.
- The population growth experienced at County Level and the Drogheda and Environs Area, all exceed the national growth rate (31.3%) and the Greater Dublin Area (37.5%) from the period 1996-2016. St. Laurence Gate ED with a growth of only 18.8% in the same period has been restricted by lack of dwelling unit provision.
- This growth together with the current lack of availability of units is demonstrative of a shortage of supply and there exists a clear need to provide additional residential units which are appropriate both in terms of unit mix and affordability.
- This is reflected in the designation of County Louth as a rent pressure zone since July 2019, which in turn correlates with market evidence that a higher vacancy rate is required to avoid excessive increases in rents or purchase prices and ensure a housing market functions efficiently.
- In summary, considering the above the proposed zoning of the subject lands for residential development should be supported by the Planning Authority.

03 Local Context & Concept

3.5 Proposed Zoning (As Per Draft 2021-2027 CDP)

The subject lands are designated as per the published Draft CDP 2021-2027 as:

- 'E1' General Employment, and
- 'H1' Open Space

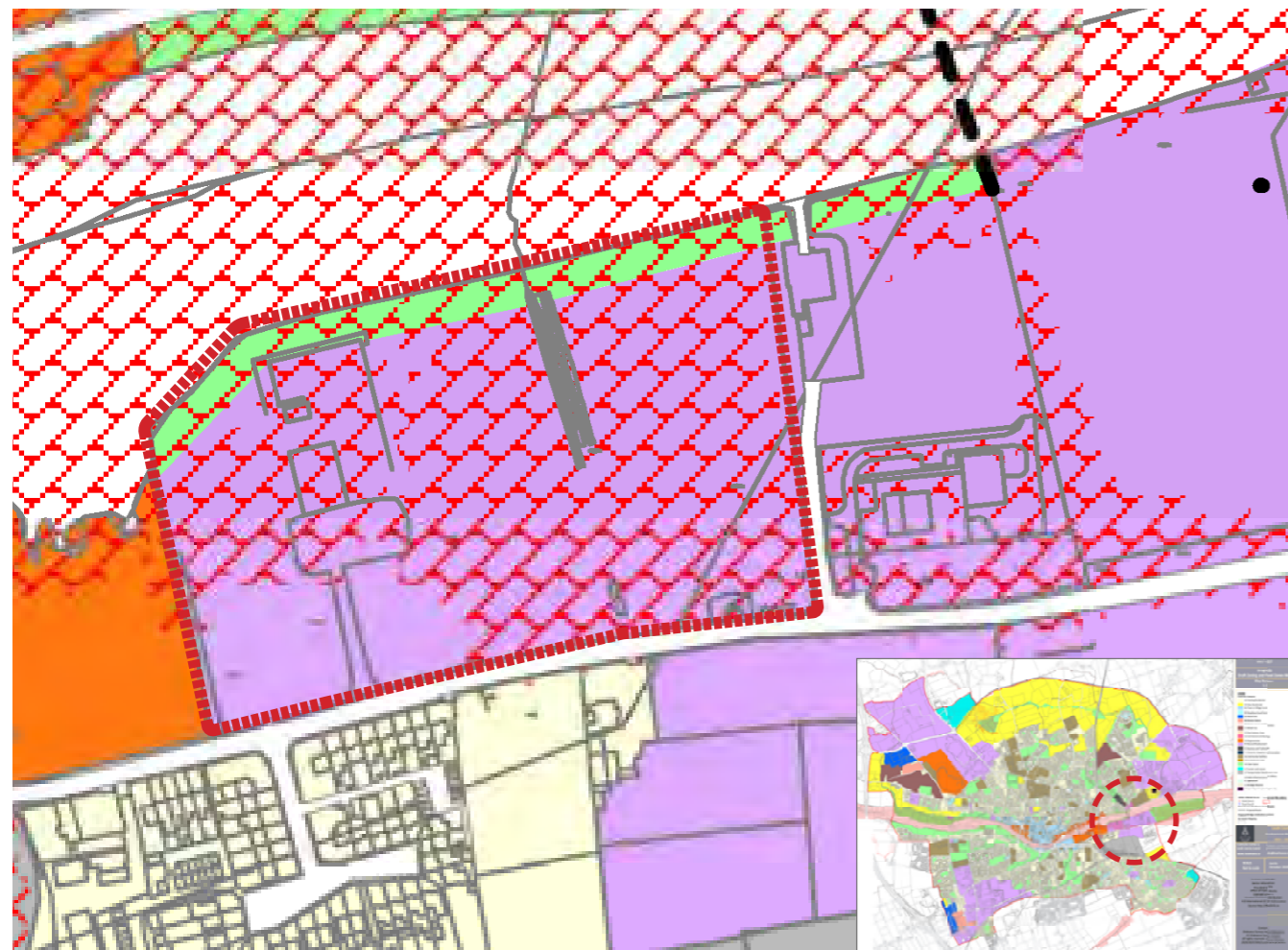
On review we note these zoning designations are the same/similar to that contained within the Current Louth CDP (2015-2021) which accords with the Drogheda Borough Council Development Plan (2011-2017; as extended).

We also note that the current zoning designations are proposed to be maintained in the forthcoming CDP 2021-2027.

However, it is our considered assessment that the current/proposed zoning for the site would be more appropriate as residential going forward, as the site is located in what is can be considered a residential area.

This is particularly the case going forward given the existing residential context which surrounds the site, as well as the nearby Ravala SHD proposal, and extant permission reference 17387 which are both located further away from the town centre than our client's lands.

The sequential approach for residential zoning(s) under the NPF are also again highlighted as previously detailed in section 3.3 of this submission.



Proposed Zoning under Draft Louth CDP 2021-2027

3.6 Recommended Zoning

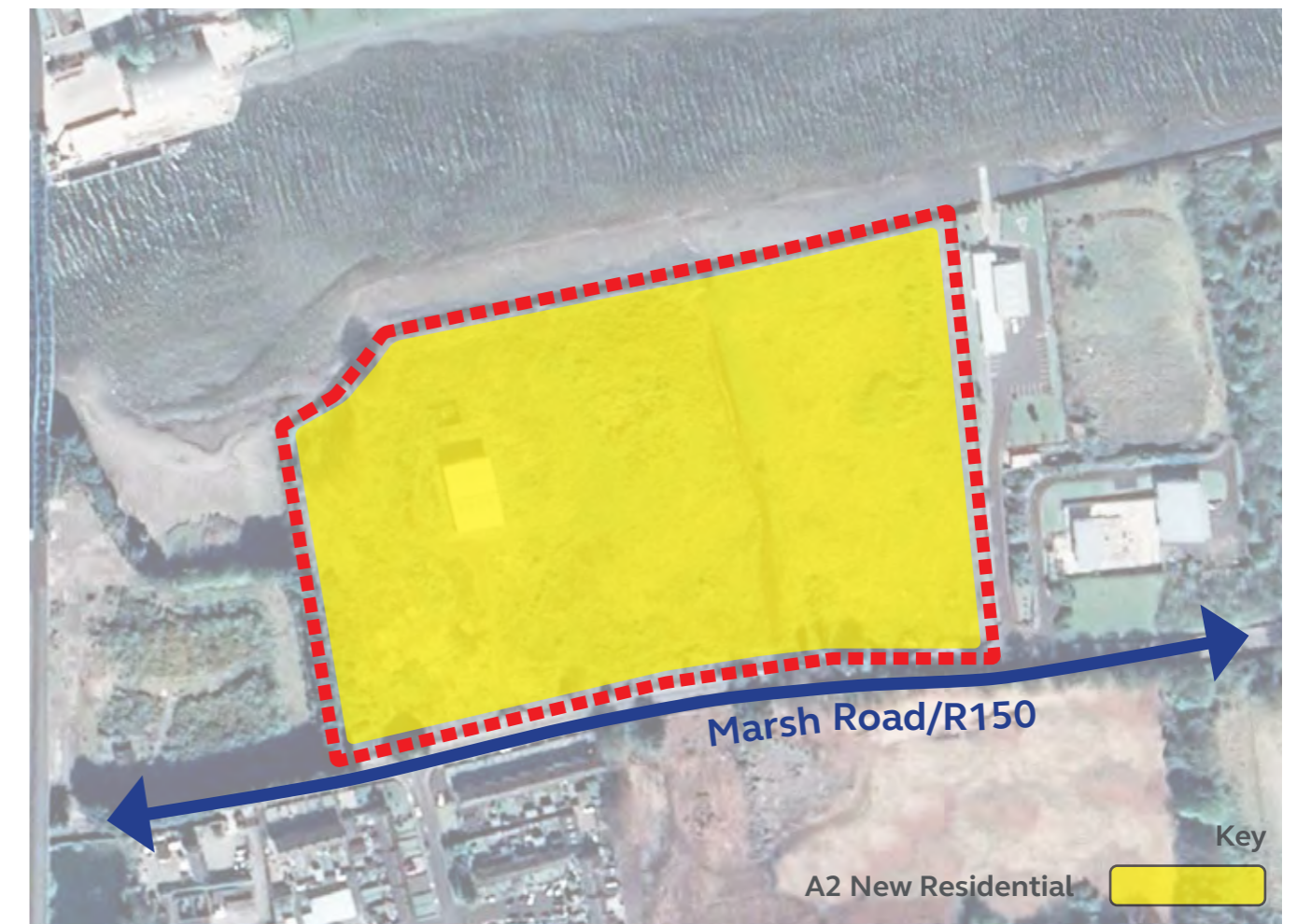
As the Planning Authority will note, the section 28 development plan guidelines state:

- Development plans should be strategic
- Development plans should be a catalyst for positive change and progress
- Development plans should anticipate future needs on an objective basis
- Socio-economic development is to be promoted

Going forward, as part of the 2021-2027 CDP we request:

- The Planning Authority include the subject lands within the settlement envelope for Drogheda.
- The subject lands are zoned in entirety for 'A2 New Residential'.
- The Development Management zoning matrix also permits alternative uses to be acceptable in principle.

We refer to section 3.7 overleaf which demonstrates our justification is appropriate to the context.



Recommended Zoning under Louth County Development Plan 2021-2027

03 Local Context & Concept

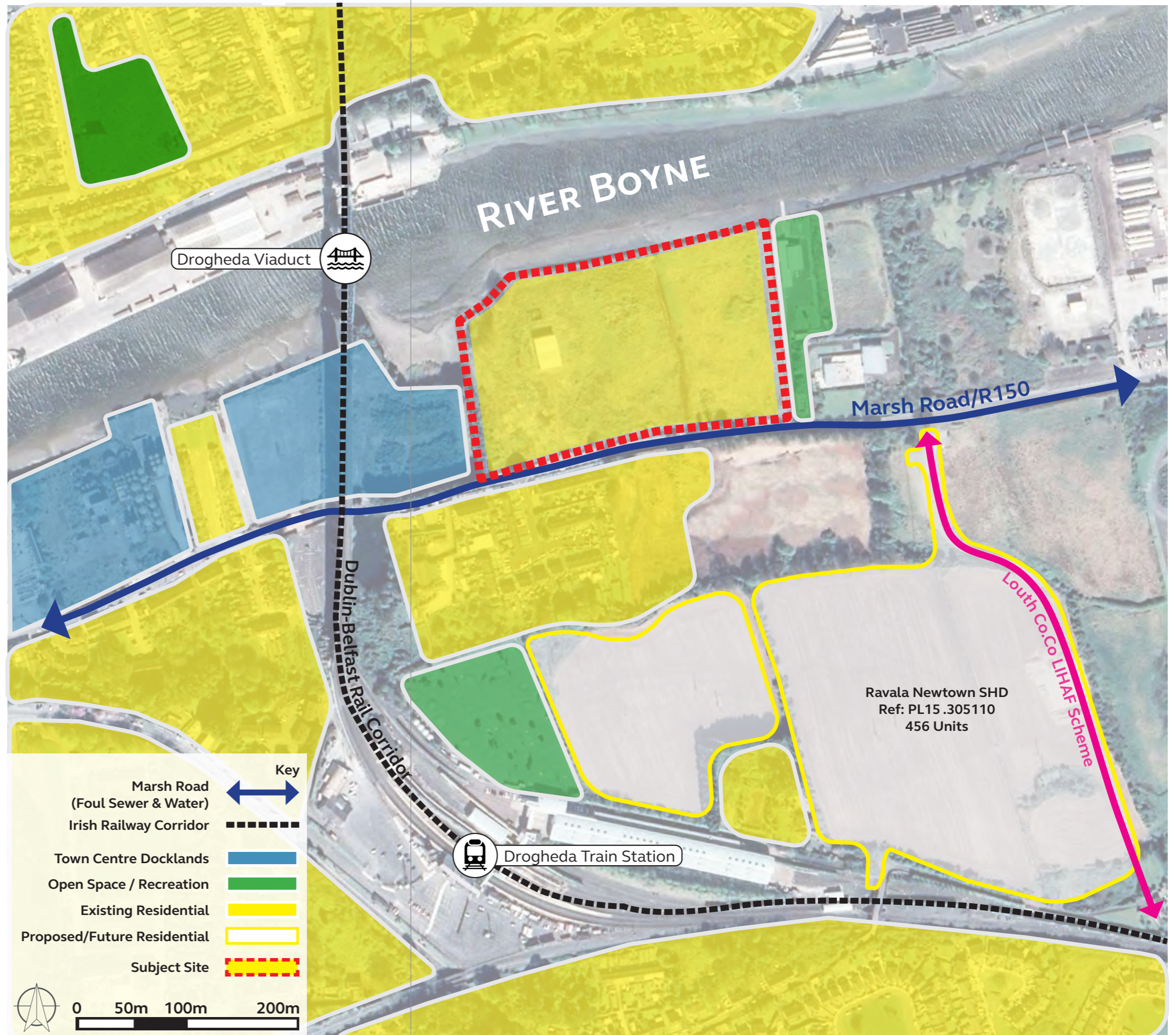
3.7 Proposed Zoning & Context

On our review of the zoning objectives and the local context we highlight the surrounding land uses in the immediate vicinity are compatible and supportive for a residential scheme on the subject lands. We highlight:

- The western boundary is defined by lands identified as 'Town Centre Docklands'; the objectives of which are 'to provide for a mix of new town centre activities in accordance with the Docklands Area Plan'.
- The northern boundary is defined by the River Boyne, and this provides an ideal opportunity for a high-quality residential scheme to bring residential activity to this edge-of centre waterfront location.
- The eastern boundary is defined by the existing Inver Colpa Rowing Club Clubhouse premises, and opposite/south is the Weirhop Estate. A residential scheme on the lands is appropriate to this context.
- Further south of the subject lands is the Louth County Council LIHAF (Local Infrastructure Housing Activation Fund) Road Scheme, which provides access to the Drogheda Transport Development Area (DTDA) via Marsh Road. This road scheme provides a clear upgrade to local road infrastructure to coincide with a residential scheme on the lands being developed.
- Also, in terms of local zoning objectives we highlight the objectives of the nearby DTDA is to

'protect and expand the existing transport hub around the train station and facilitate the development of Public Transport facilities including residential, retail, and office development' (emphasis added).

- We again highlight the location and principle for Ravala SHD has been deemed acceptable by the both the Planning Authority and the board. In this context we submit the subject lands are brownfield, closer to the town centre, existing infrastructure and community services than the Ravala SHD site.
- In this context we submit that zoning the subject lands as residential would be consistent and appropriate in land use terms with the surrounding land uses, and consistent with national, regional and local policy objectives.





04 | Summary & Conclusion

4.1 | Summary & Conclusion

4.0 SUMMARY & CONCLUSION



This submission relates to the subject lands at Marsh Road, Drogheda.

In summary this submission requests:

- **The Planning Authority include the subject lands within the settlement envelope for Drogheda.**
- **The entirety subject lands are zoned for A2 New Residential.**
- **The development management zoning matrix permits alternative uses to be acceptable in principle and open for consideration.**

Key points of this submission include:

- With Drogheda recognised as a regional growth centre in the context of a Dublin-Belfast corridor (to be targeted for growth and investment as a key driver for the eastern and midland region), we submit that the proposed zoning is consistent with the strategy and objectives as set out in the NPF.

- As the subject lands are strategically positioned within the settlement boundary of Drogheda, the zoning of the lands for 'A2 New Residential' is consistent with the objectives set down by the RSES in that it will improve the supply of residential units for Drogheda in a sustainable manner through the consolidation of the core urban area.
- The population growth experienced at County Level and in the Drogheda and Environs Area exceed the national growth rate (31.3%) and the Greater Dublin Area (37.5%) from the period 1996-2016.
- There is a clear shortage of residential units being provided in Drogheda, particularly within the St. Laurence Gate ED.
- This is reflected in the designation of County Louth as a rent pressure zone since July 2019.
- In terms of site context, the subject lands are in close proximity to the MacBride train station.
- Given the DART is to be extended to Drogheda, a residential development on the subject lands is wholly supported by all National planning objectives which seek to deliver additional residential units within walking distance of public transport nodes.

- Given the proximity to Macbride Train Station the site is ideally placed for a sustainable residential development to be delivered.
- Existing cycle/footpaths provide good connections to services in the local area, namely the R150 (Marsh Road) which is well serviced by public transport offering a 15minute bus service (D1/D2 routes) to the town centre with opportunity to continue onwards via the public transport network available.
- The LIHAF road being developed adjacent and to the west along Marsh Road also further strengthens the suitability of these lands to be delivered for a residential development.
- The site is appropriate in terms of sequential development given:
 - (i) The site is to be categorised as 'Tier 1 Service Zoned Land' as per the NPF and should therefore be prioritised for residential development.
 - (ii) The site is directly accessible from the existing and future road infrastructure.
 - (iii) The site is included within the settlement boundary of Drogheda, in close proximity to the town centre.
 - (iv) The site is within walking and cycling distance of local amenities.

(v) The site is sequentially the next available parcel of lands for residential development and also represents sustainable infill development.

- On our review of the zoning objectives and the local context we highlight the surrounding land uses in the immediate vicinity would be compatible with and complementary to a residential scheme on the subject lands.
- With the provision of residential development on the subject lands going forward there will be a better ratio of jobs-to-residents in an area of Drogheda which is zoned heavily for future industry/employment expansion.
- We also submit a residential development on the lands will be consistent with all National and Regional Policy objectives which seek to provide additional residential units on such brownfield and infill lands.
- We submit these attributes make these lands strategically important in the overall development of Drogheda, and consider it appropriate for the Planning Authority to zone the subject lands for 'A2 - New Residential' in the forthcoming CDP.



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