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Development Plan Review
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Town Hall, Crowe Street,
Dundalk, Co Louth.
A91 W20C

18th December 2020

**RE: Draft Louth County Development Plan 2021 – 2027
Submission on behalf of Moffett Investment Holdings in relation to
Lands at North Drogheda.**

Dear Mr Pentony,

With reference to the above, and further to your invitation to the public to make submissions in respect of the Draft County Development Plan 2021 – 2027 for County Louth, please note that we have been appointed by Moffett Investment Holdings to make this submission on her behalf.

Background:

Our client owns significant lands in the North Drogheda Environs Local Area Plan 2004 area, zoned for residential purposes. These lands, identified in Figures 1, 2 and 3 have the benefit of planning permission for a significant residential development of 527 residential units and considerable commercial space comprising one of the three designated Neighbourhood Centres in North Drogheda. Planning reference 08/101 extended by 18/667 applies in this regard.



Figure 1: Satellite Image - Land Ownership in blue, Liscorrie in red.

Permission will expire for this development during the new CDP period. Please see maps below showing the approved site layout plan and another showing the scheme in context with other approved schemes in the area.



Figure 2: Approved Site Layout Plan 08/101



Figure 3: The Scheme in context with other planned & permitted Schemes

It should be noted that our client was instrumental in the completion of the Liscorrie Estate adjoining the subject lands and since they became involved in North Drogheda 111 new residential units have been delivered on this site with approximately 50 social housing units among them in a high-quality mixed tenure residential development.

Please note that our client made a submission at pre-draft stage and broadly welcomes the approach taken by Louth County Council in respect of Drogheda. However, we still have significant concerns relating to the Draft County Plan and how the policies and objectives contained within it relate to Drogheda, the development of North Drogheda and our client's lands in particular.

Section 1: Key Issues/Executive Summary

1. Section 2.12.1 and Section 2.13 of the Draft County Development Plan for County Louth sets out no clear Vision or Aspiration for Co Louth's largest town, Drogheda, which is also Ireland's largest town and next emerging city.
2. Flood Zones are shown on the Composite Land Use Zoning Map produced for Drogheda. This shows that the area in which permission for housing has already been granted on our clients lands is, in part, subject to flooding, and that the flood area will exceed the large open space (identified as the 'wetland park' in the 2006 Masterplan for North Drogheda Environs (adopted as a variation to the 2004 Local Area Plan). The Wetland park was to contain (and attenuate) existing and future flooding events within the identified park so as to make better use of the available land for housing. This function is not referenced in the Draft Plan.
3. Core Strategy and Housing Allocation seeks to unnecessarily limit the growth of Drogheda, contrary to the objectives of National and Regional Planning Policies.
4. Section 2.13.6 limits the North Drogheda Environs to perform its stated function i.e. to *'ensure the town has the capacity to deliver the population and economic growth envisaged in the NPF and RSES and will act as a counter balance to the level of growth that has taken place in the Southern Environs of the town.'*

Please note that our client feels that Drogheda (and its Northern Environs) is an appropriate location for sustainable residential development and population growth, due to a number of strategic and locational factors including the following:

- Government Policy – The Rebuilding Ireland Action Plan on Housing and Homelessness supports the need for residential development on sites within and contiguous to existing urban areas,
- Drogheda's status as a Regional Growth Centre in the National Planning Framework – Ireland 2040,
- Drogheda's strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry,
- Drogheda's status as a Regional Growth Centre within the Regional Spatial & Economic Strategy for the Eastern and Midlands Region and its unique status as the only Regional Growth centre within the hinterland area of the Greater Dublin Area,
- The National Development Plan 2018 – 2027 includes for the DART Expansion program and the electrification of the rail network to Drogheda.
- Drogheda's strong town centre, its capacity in terms of services and infrastructure, and its capacity in terms of social facilities and amenities,
- Drogheda's significant potential for employment growth, which can complement compact residential growth,

- Drogheda has excellent public transport links including rail transport and public and private bus services.

As such, we would respectfully suggest that Louth County Council amend the Draft Plan before adopting it as follows:

1. Include a strong unifying vision for Drogheda dispensing with references to Drogheda, South Drogheda Environs and North Drogheda Environs. There is only one settlement for consideration here.
2. Remove cap on population growth and residential development imposed by the Core Strategy and Housing Allocations which unnecessarily limits growth of this Regional Growth Centre to just 20%, contrary to national policy.
3. Remove the references at Section 2.13.6 to the unwieldy phasing arrangements in the 2006 variation to the 2004 Local Area Plan that have so limited the development of North Drogheda.
4. Include a spot objective on the Land Use Zoning Map for Drogheda, on the residentially zoned lands which overlap those areas at risk of flooding adjacent to the planned wetland park, indicating that development in these areas will be subject to flood risk assessment and that mitigation measures including compensatory storage, evidenced with appropriate modelling to demonstrate efficacy of any such proposals will be considered.
5. Provide a specific policy objective to achieve a new rail station in North Drogheda. There is potential for a second rail station in South Drogheda too presenting the possibility of Dart Links between residential areas like Grange Rath on the Dublin Road and Termon Abbey on the Termonfeckin Road.
6. Remove H1 Zoning through the north Drogheda environs residential area and provide specific objectives regarding the delivery of a linear park.

Section 2 – National Planning Context:

The National Planning Framework (NPF), Ireland 2040 contains numerous relevant objectives and policies as follows:

- Growth of 490,000 to 500,000 people is planned for the Eastern and Midlands region.
- The NPF identifies Drogheda as a regional growth centre and recognises its strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry.
- NPO (National Policy Objective) 2b states *'The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy'*.
- NPO 11 states: *'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'*.
- NPO 27 seeks to *'Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages'*.
- NPO 33 aims to *'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location'*.

In summary, the NPF requires planned growth at locations that can sustain such development. It demands compact development within urban areas and provides that where the expansion of settlements takes place it should be delivered in a sustainable, compact manner.

National Development Plan 2018 – 2027

The National Development Plan 2018 – 2027 sets out the main investment projects, programmes and priorities envisaged over the next decade to drive the implementation of the National Planning Framework.

The NPF states that the Dart Expansion Programme will see Drogheda serviced by DART by 2027, which will provide fast, high-frequency electrified services to Drogheda.

Section 3: Regional Planning Context

Eastern Midlands Regional Assembly - Regional Spatial and Economic Strategy (RSES)

- The vision statement of the RSES is ‘to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all’.
- Drogheda is defined as a Regional Growth Centre in the RSES in accordance with the NPF. It enjoys a strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry. Drogheda is the only regional growth centre within the hinterland area of the Greater Dublin Area. The RSES defines Regional Growth Centres as being *‘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 acknowledges that the ‘compact and focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale’ is an enabler for the Dublin - Belfast Corridor reaching its full potential.
- On Page 61, the RSES states:
“Key priorities are to promote the continued sustainable and compact growth of Drogheda as a regional driver of city scale with a target population of 50,000 by 2031. The objective is to provide for the regeneration of the town centre, the compact planned and co-ordinated growth of the town’s hinterland along with enhancing Drogheda’s role as a self-sustaining strategic employment centre on the Dublin-Belfast Economic Corridor.”
- The RSES supports *‘the direction of significant population and economic growth towards the key Regional Growth Centres of Athlone, Drogheda and Dundalk. These towns located outside the Dublin Metropolitan Area are, in addition to Dublin, critical to the implementation of effective regional development as set out in the NPF. They 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’*.
- Regional Policy Objective 4.11 states that *“A cross boundary statutory Joint Urban Area Plan (UAP) for the Regional Growth Centre of Drogheda shall be jointly prepared by Louth and Meath County Councils in collaboration with EMRA. The UAP will support, the development of Drogheda as an attractive, vibrant and highly accessible Regional Centre and economic driver. The Joint UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.”*
- Future development required to achieve the growth vision for Drogheda included in the Joint UAP shall:
 - *“Provide for the sustainable, compact, sequential growth and urban regeneration in the town core by promoting the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.*

- *Support the regeneration of the Westgate area of Drogheda’s historic town centre to address vacancy and dereliction in the town core and as an alternative option to new development on greenfield sites.*
 - *Facilitate the regeneration of lands at McBride Station to capitalise on existing and planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.*
 - *Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.*
 - *Support the sustainable development of existing zoned lands in the northern and southern environs of the town with a particular emphasis on the promotion of the IDA Business Park as a location for economic investment and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs.*
 - *Support the implementation of the Urban Design Framework Plan for the Heritage Quarter.”*
- Regional Policy Objective 4.12 relates to Drogheda Port and the delivery of the PANCR.

RPO 4.12: Support the role of Drogheda Docklands and Port in particular by:

- Supporting and protecting the role of Drogheda Port as a port of regional significance
- Facilitate relocation of Drogheda Port subject to a feasibility study and appropriate coastal zone management.
- Supporting the future development of the Port Access Northern Cross Route (PANCR).

Meath Draft County Development Plan 2021 – 2027

Meath’s Draft Plan places Drogheda at the top of its settlement Hierarchy recognising its regional Growth Centre Status, whilst also recognising that parts of the county are within the Metropolitan MASP area.

Section 2.8.11 of their plan recognises the requirement for an Urban Area Plan to be prepared jointly by Louth and Meath County Councils. This section of the Meath Core Strategy Chapter goes on to acknowledge that:

It is acknowledged that any amendments to the land use zoning strategy for the Southern Environs of Drogheda would be premature pending the preparation of this Joint Plan. However, the Council also recognises that Drogheda is one of the principle areas for population and economic growth in the Eastern and Midland Region outside Dublin. Taking this into account it is important that land use availability is reflective of its position in the settlement hierarchy and its anticipated role in the future growth and development of the Region, which is to act as a regional driver of economic growth. The ‘Residential Phase II’ designation on the A2 ‘New Residential’ lands in the Southern Environs of Drogheda has therefore been removed with these A2 ‘New Residential’ land retained and being made available for development. This ‘transitional arrangement’ will ensure there is sufficient land available to facilitate population growth and economic development based on its designation as a Regional Growth Centre.’

This shows that in recognition of Drogheda’s status Nationally and Regionally, Meath have taken a proactive approach to future growth so that Drogheda can fulfil its role as a regional economic driver.

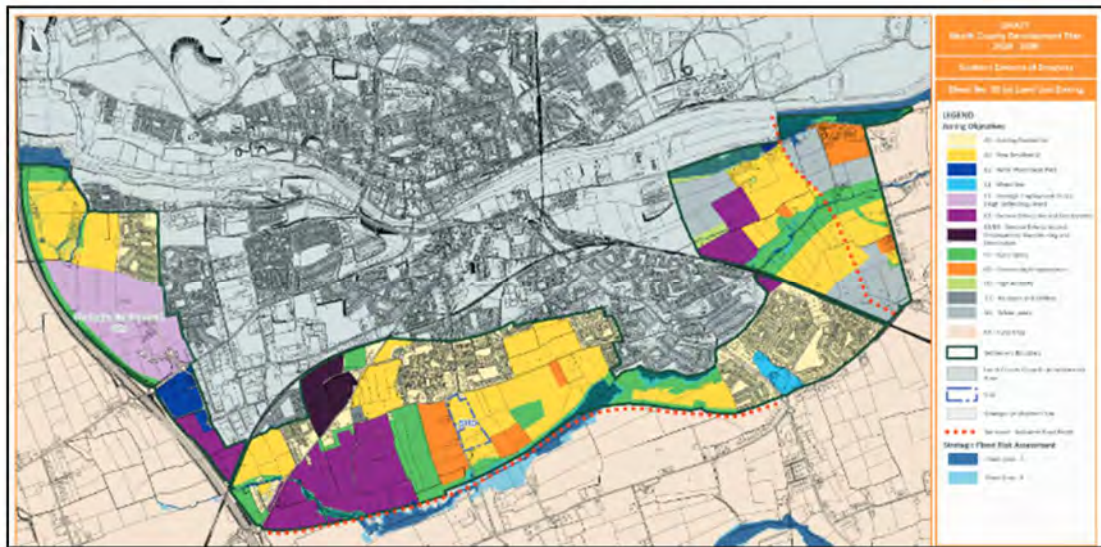


Figure 4 – Meath Draft CDP Land Use Zoning Map for Southern Environs of Drogheda.

Table 2.11, Core Strategy Table shows Drogheda projected population increase in Drogheda from 2016 – 2026 amounting to approx. 50%. See figure 2.7 below.

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I
Settlement	Population 2016	Projected population increase to 2026	Projected population 2026	Approximate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2026 ⁴⁰	Potential units to be delivered on infill/brown-field lands ⁴⁰	Quantum of land zoned for residential use (ha)
Regional Growth Centre								
Drogheda	6,527	3,300	9,827	113	572	1,631		178.73
Key Town								
Navan	30,173	5,100	35,273	781	924	2,884	1,936	83.6
Maynooth	0	1,000 ⁴⁰	1,000	0	0	500	0	21.36

Figure 5: Excerpt from MCC Core Strategy Table.

The Meath Draft CDP written statement for the Southern Environs notes that

Drogheda is the largest town in Ireland, with a population of almost 41,000 in 2016. The town is strategically located along the Dublin-Belfast Economic Corridor. Its importance as a centre for population and economic growth is recognised in the designation of the settlement as a Regional Growth Centre in the National Planning Framework. The Southern Environs of the town lies within the jurisdiction of Meath County Council, where there are strategically located employment and residential lands.

The Meath CDP notes that there has been an increase in residential activity in the South Drogheda recently (at the Rathmullen Road, Duleek Road and a Strategic Housing Development at Bryanstown). The written statement confirms that Meath's CDP will support the creation of sustainable communities in South Drogheda, with the development of residential lands being dependent on the provision of any necessary social and physical infrastructure. There is no attempt to favour particular land holdings or landowners, the message is reasonably straightforward – significant population growth is allowed in Drogheda provided the necessary infrastructure can be provided.

Office of Planning Regulator's comments on Meath Draft Development Plan

The OPR has made a submission on Meath's Draft Plan and how Drogheda is treated within the settlement strategy, Core Strategy and Growth Plans. The OPR stated: –

'As noted above, the proposed core strategy is generally consistent with the NPF and RSES concerning overall population growth to be accommodated over the period of the development, having regard to National Policy Objectives (NPOs) 1a, 1b and 1c. In particular, it supports the growth strategy for Drogheda under the RSES to grow to a population of 50,000, in line with the provisions of the NPF (NPO2b refers) which designate Drogheda as a Regional Growth Centre. It also provides for the planned growth of Dublin Metropolitan area (as provided for under NPO67 and NPO68).

In terms of managing overall population growth to 2040 in a way that enables social and physical infrastructural delivery to keep pace in the interests of sustainable communities, NPF NPO9 determines a level of 30% to be appropriate except for settlements identified under NPO2a or NPO2b of the NPF (such as Drogheda Regional Growth Centre), or those otherwise agreed through the RSES (such as Navan key town).'

In short, the OPR notes that settlements can be identified for growth up to a maximum of 30%. Those listed at NPO 2 (a & b) should have higher targeted growth i.e. Drogheda. The OPR goes on to acknowledge the 50% targeted growth in South Drogheda and criticize the unambitious 17% in Navan where greater growth is allowed for under the RSE:.

'The implementation of NPO9 is a key element to ensure the overall implementation of compact growth, including the consolidation of development within the five cities and the regional growth centres, in addition to the key settlements identified in the RSES. Whilst the draft plan provides for 50% growth for Drogheda, only 17% growth is proposed for Navan, whereas greater growth is allowed for under RSES.'

For ease of reference, NOP 9 and 2a and 2b are reproduced below.

National Policy Objective 9
In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:
<ul style="list-style-type: none">○ Agreement (regional assembly, metropolitan area and/or local authority as appropriate);○ Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target.; and○ A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services.

National Policy Objective 2a

- A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs¹⁵.

National Policy Objective 2b

- The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy.

In relation to the requirement (RSES and NPF defined) for a Joint Urban Area Plan to be prepared for Drogheda, the OPR recommended to Meath Co Co that:

Your authority is advised to include an objective or amend the objectives of the development to prioritise the preparation of the Joint UAP for Drogheda and the Joint LAP Maynooth ahead of any other LAPs, setting out target dates for commencement of the process and for the eventual making of the said joint plans.

In short, the OPR sees the development of the joint Urban Area Plan as an absolute priority for both Louth and Meath County Councils.

Louth County Council's submission on Meath's Draft County Development Plan

We note with interest that Louth County Council's submission welcomed the inclusion of objectives in Meath's Draft CDP regarding the preparation of a Joint Urban Area Plan. It also acknowledged the fact that the RSES provides a target population for Drogheda by 2031 of 50,000. Helpfully, Louth Co Co acknowledge that the 50,000 figure is not a cap on population.

Louth County Council did question the rate of planned population growth in South Drogheda proposed by Meath County Council.

In relation to Economic Development potential for Drogheda, the Louth Co Co submission sets out the following ambitious vision:

Economic potential of Drogheda and the Dublin-Belfast Economic Corridor

The Draft Plan acknowledges the strategic location of Drogheda along the Dublin-Belfast Economic Corridor and its potential to act as one of the principle drivers for economic growth in the Region.

One of the primary objectives of the Joint Plan will be to strengthen the economic base of Drogheda by creating an environment that businesses find attractive to invest in and employees find attractive to live and work. The Council looks forward to working with Meath County Council in developing a strategy that builds on the economic strengths of Drogheda and supports employment growth which will assist in creating more sustainable and healthy communities and reduce the dependence on commuting for employment.

The identification of the Dublin-Belfast Economic Corridor as an area of significant economic potential and the policies supporting economic development along this Corridor are welcomed. The concentration and clustering of businesses and enterprises along this Corridor and in particular the Regional Growth Centres of Dundalk and Drogheda will assist in creating centres of scale that have the capacity to accommodate significant population growth and economic investment.

This statement envisages Drogheda as an environment that businesses find attractive to invest in and employees find attractive to live and work in. It notes that Drogheda, through its strategic location on the Dublin Belfast Economic Corridor can become a centre of scale with the capacity to accommodate significant growth and economic development.

Louth Co Co convey support for Meath's inclusion of a specific objective to prepare a local transport plan for Drogheda and East Meath, which is to be prepared in association with Louth Co Co.

In relation to Drogheda Port and the Port Access Northern Cross Route (PANCR) Louth County Council included the following commentary:

Drogheda Port and Port Access Northern Cross Route

Drogheda Port is an important economic asset to the town. The regional significance of the Port is highlighted in the RSES with Regional Policy Objective 4.12 supporting the role of the port area. The future development of the Northern Environs of the town and the redevelopment of the port area is closely linked to the construction of the Port Access Northern Cross Route. The progression of the Port Access Northern Cross Route would result in improvements to traffic flows and movements throughout the town making it a more attractive location for potential investors. It is requested that the Written Statement for the Southern Environs of Drogheda acknowledges the importance of the Port Access Northern Cross Route in the future development of the town.

The significance of the PANCR with respect to the build out of North Drogheda and for Drogheda's ability to attract investment is noted here.

Section 4 – County Louth’s Draft Development Plan 2021 - 2027

Core Strategy and Housing Allocation.

As previously stated, Meath County Council have targeted Growth of 50% in South Drogheda their Draft CDP, whilst Louth are planning for 20% (6,914/34,199 see Table 2.4 below) increase for the rest of this Regional Growth Centre. We would contend that a minimum of 30% growth should be targeted and that the Draft CDP should state categorically that this is a target and not a cap.

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
Self-Sustaining Growth Towns	Ardee	4,928	1,655	6,583	2,751	749	165	584	8.5	298	54.6
	Dunleer	1,822	935	2,757	1,144	425	80	345	3.1	109	13
Self-Sustaining Towns	Carlingford	1,445	200	1,645	881	41	0	41	2.6	31	2.2
	Castlebellingham / Kilsaran	1,126	110	1,236	597	87	8	79	1.1	27	10.9
	Clogherhead	2,145	300	2,445	1,034	139	0	139	1.6	39	2.9
	Termonfeckin	1,579	250	1,829	663	81	40	41	3.4	40	2.4
	Tullyallen	1,547	220	1,767	630	130	15	115	1.2	29	0
Small Towns	Level 4 Settlements	5,103	785	5,888	2,405	436	22	414	24.1	260	21
Villages	Level 5 Settlements	35,986	300	38,039	14,536	1,246	375	871	N/A	N/A	N/A
Rural Area	Rural Area		1,753								

Figure 6: Louth Draft CDP Table 2.14

The household allocation of approximately 3000 units 2021 – 2027 for Drogheda is extremely problematic as there are extant permissions for over 4,000 units within the settlement, many of these with 3 – 4 years left to run before they expire. This creates the scenario whereby reasonable and deliverable proposals for housing might be refused because of the existence of extant permissions which have little or no chance of being fully realised. Louth Co Co should reference these extant permissions in their core strategy analysis and allow for an additional allocation over and above these permissions.

It is our contention that setting populations and dwelling number caps on zoned land in a Regional Growth Centre during a protracted and deepening housing crisis is counter intuitive and will act as a barrier to investment.

Section 2.13 Drogheda

This section begins with an overview of Drogheda – noting the cross-boundary position between Louth and Meath and that 84% of the population live in Co. Louth. Unhelpfully, a diagram defining ‘what’ Drogheda comprises is included on Page 2-28:

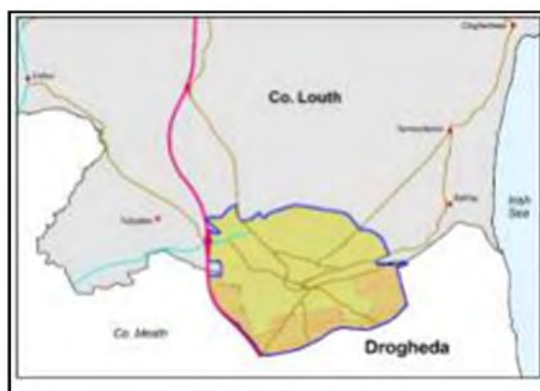


Figure 7: ‘Drogheda’ as per Section 2.13

We would contend that the influence of Drogheda as a Regional Growth Centre can be considered in a much wider context. The boundary to be considered for the UAP is not yet defined.

The Draft Plan welcomes the requirement in the RSES to prepare a Joint Urban Area Plan for Drogheda between Louth and Meath County Councils, and it goes on to state that ‘*The UAP/LAP will be informed by the strategic objectives set out in this Draft Plan*’. However, no such strategic objectives are actually set out in Louth’s Draft Plan with respect to the content of the UAP.

We welcome the acknowledged role that the development of North Drogheda Environs area will play and the importance of the PANCR in this regard as per Section 2.13.2: *The development of the employment and residential lands in the Northern Environs and the delivery of the Port Access Northern Cross Route (PANCR) are also a fundamental element of the immediate and long-term growth strategy for the town. The delivery of the PANCR is critical to the removal of port related traffic from the town centre and the facilitation of the regeneration of town centre lands.*

Section 2.13.6 relates to the Northern Environs of Drogheda. It states:

This land bank will form part of the UAP/LAP and will ensure the town has the capacity to deliver the population and economic growth envisaged in the NPF and RSES and will act as a counter balance to the level of growth that has taken place in the Southern Environs of the town.

There statement is notable in that:

- The reference to LAP seems inappropriate. There will be an Urban Area Plan the content of which is described in the RSES as mandated by the NPF.
- The lands do have the capacity to deliver population and economic growth, but the Planning Authority choose not to. The Core Strategy and housing allocation severely limit this growth to a maximum of 20%.

- Meath's Draft Plan which is expected to be adopted in advance of Louth's CDP includes for 50% population growth in South Drogheda. If Louth Co Co wish to see the Northern Environs lands acting as a counterbalance to the Southern Environs then it should be allowed to grow at a similar the same rate.

Louth County Council note that the build out of these lands should be coordinated so that the necessary social, community, and recreational infrastructure is provided in tandem with residential development. The method of ensuring this is then provided as follows: *In this regard there will be a 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 or any subsequent Master Plan prepared for the area.*

In response to this we would respectfully draw your attention to the fact that over 4500 residential units (with creches, shops, office spaced, supermarkets, designated schools sites, and community facilities) were granted permission under the phasing and implementation policies and objectives of the 2006 masterplan. Most of these planned units still have permission by virtue of 10 year permissions and extensions of durations. Our client's lands are an example of this. No development on foot of any of these permissions commenced until 2017, despite a massive and unprecedented housing shortage nationally. The reason for this failure of delivery is precisely because of the unwieldy, onerous and complicated phasing and implementation objectives contained within the 2006 Masterplan referred to. Since the economy has recovered and the housing market stimulated under Rebuilding Ireland government policies, perhaps 200 out of 4,500 permitted units have been built. Most of these permitted units cannot be built due to the phasing and implementation strategies referred to.

Please note that the following statement at 2.13.6 *'Whilst it is acknowledged there is an extensive quantum of lands in the Northern Environs zoned for residential use these lands are a fundamental part of the long term growth strategy of the town that will be developed over a number of development plans'* has the effect of suggesting to potential developers and investors in the region that significant parts of the North Drogheda Lands will not be available for development during the lifetime of this plan, or the next one. This creates uncertainty and dilutes the need for infrastructure funding/investment by central government in the near term. This statement should be deleted, it serves no useful purpose, and creates uncertainty.

The 2004 Local Area Plan for north Drogheda and the subsequent 2006 Masterplan variation included an objective to provide a rail station in the Northern Environs area. Inexplicably, this objective had been dropped and even though central government plans to provide Dart Services to Drogheda and beyond. SS13 should be amended to clearly set out that it is Louth County Councils policy that there be a second rail station on the North side of Drogheda.

Policy Objective	
SS13	To support investment in public and sustainable transport infrastructure and services in Drogheda including the progression of the DART Expansion Programme which includes the electrification of the rail line and the extension of DART services to Drogheda.

Interestingly, there is no objective to prepare a transport Study for the greater Drogheda area, despite Louth Co Council wanting to be involved in Meath County Councils transport study for the southern Environs and East Meath. Respectfully, in the interests of joined up thinking and coordinated planning, policies mirroring those (which Louth Co Co are on record as supporting) should be included in the new County Plan.

No vision for Drogheda, what constitutes its unique strengths, weaknesses and opportunities is provided. No assessment of the threats to realising the national and regional objectives for this important settlement is provided.

Land Use Zoning Map

The Draft CDP for Louth includes a new land use zoning map for Drogheda. The settlement boundary appears to be defined at the combined Drogheda Borough Area together with the Northern Environs area defined by the 2004 LAP. Figure 8 below shows our clients land highlighted on the Land Use Zoning Map.

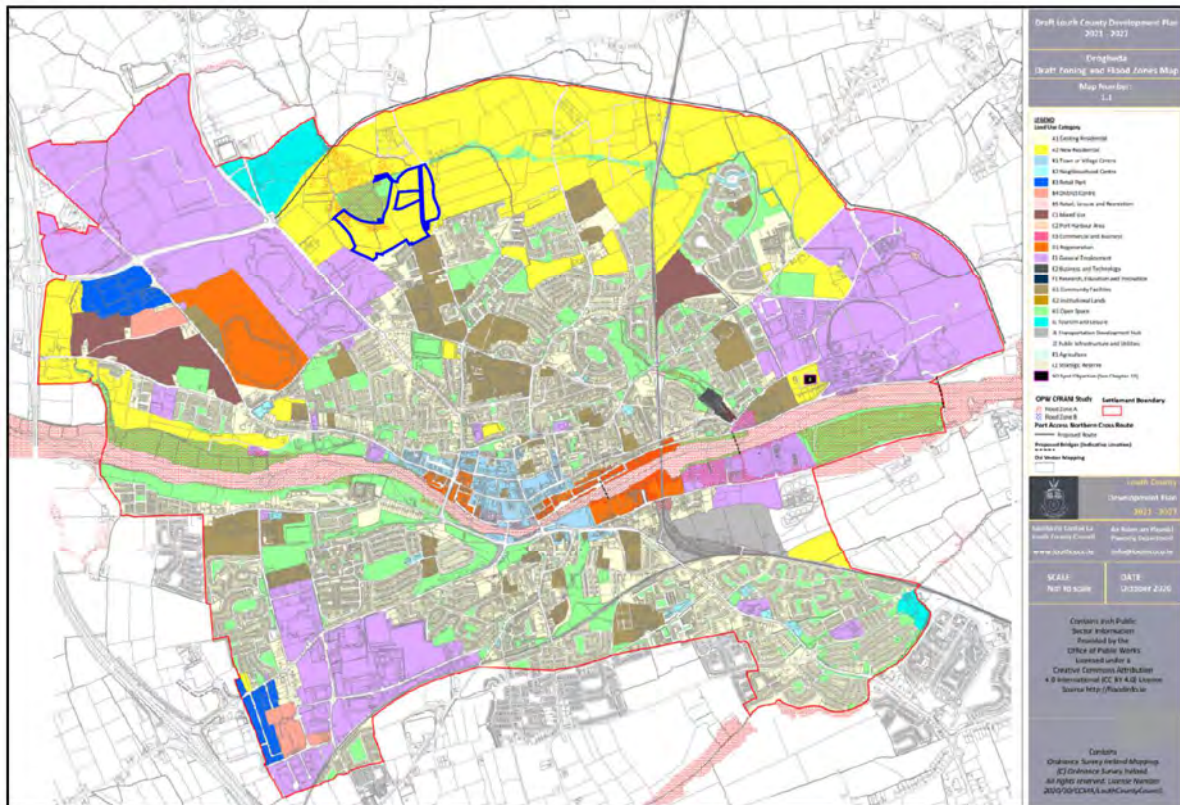


Figure 8: Draft Louth County Development Plan Land Using Zoning Map for Drogheda with Moffett Investment Holdings approved development boundary highlighted.

Please note Figure 9 below, on which we have marked the position of extant permissions in North Drogheda. The table below it gives details of the extant permission and the number of permitted and delivered units. This table shows that the extant permissions amount to over 4500 dwellings (along with commercial and community facilities).

Less than 200 residential units have been delivered since the first permission was granted in 2007. The existence of these extant permissions is not referenced in the Draft CDP, and these coupled with a cap on new residential units of only 3000 over the plan period mean that there is no rationale to grant any planning permission for new development at all during the plan period – or at least until these permissions expire in 2024.

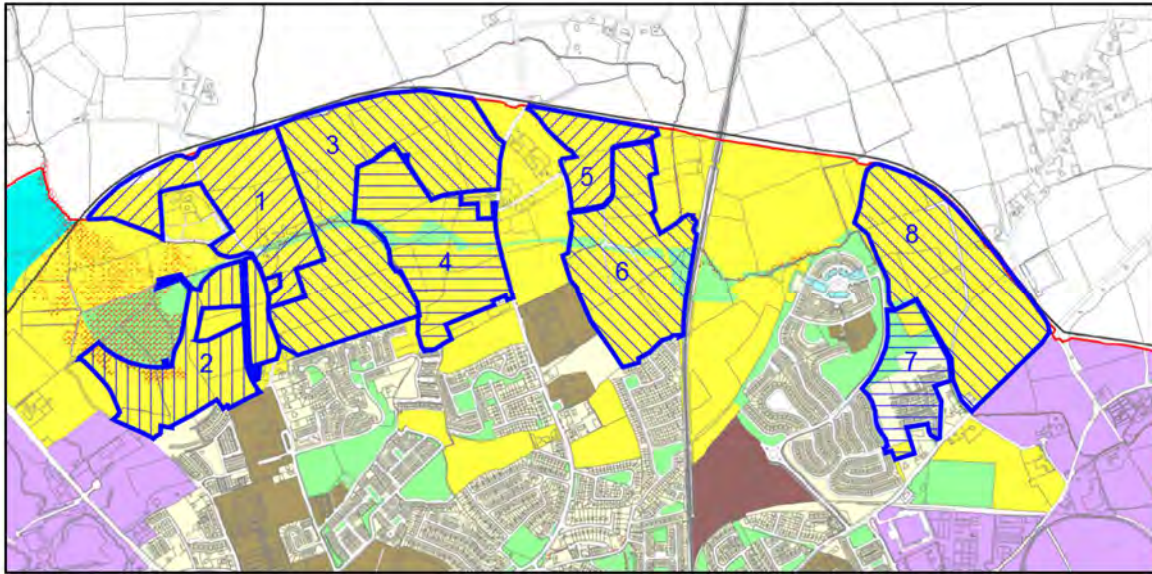


Figure 9: Draft Louth County Development Plan Land Using Zoning Map for Drogheda – Approved Schemes

	Planning Reference	Number of Dwellings	Expiry Date	Status
Site 1	071869	629	10/08/2023	No Progress
Site 2	08101	527	30/11/2023	No Progress
Site 3	071507	1056	12/07/2023	No Progress
Site 4	071399	668	05/04/2024	No Progress
Site 5	08368	204	06/10/2023	50 units approx.
Site 6	08274	688	03/11/2023	500 units approx.
Site 7	081	314	09/06/2024	100 units approx.
Site 8	071791	782	06/08/2023	No Progress
Permitted Total		4868	Delivered	200 approx.

Figure 10: North Drogheda Environs Approved Schemes Key

We note too that an area of public open space has been defined zoned H1 running east/west through the northern residentially zoned lands. 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 and dealt with by a spot objective. 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.

The land use zoning map includes no 'spot' objective pertaining to the delivery of a rail station on the north side of Drogheda.

Section 5 Discussion

The population for the Regional Growth Centre of Drogheda is projected to grow by 6,914. This marks a growth rate of just 20% to 2027. NPO 9 allows Regional Growth centres (and the 5 cities) to grow in excess of 30% of the 2016 baseline population. This approach has been recognised by Meath County Council where the projected growth rate of the southern environs of Drogheda to 2026 as expressed in the Draft Meath County Development Plan 2020 is 50%. As referenced above, the OPR and EMRA are largely supportive of this.

We note that the lower tier settlements of Ardee and Dunleer are set to increase 34% and 50% respectively, which exceeds the percentage growth rate projected for the Regional Growth Centres of Athlone, Drogheda and Dundalk as per National Policy Objective 9. NPO 9 requires that targeted growth of over 30% in settlements not mentioned at NPO 2(a&b) be agreed with the Regional Authority and justified accordingly with reference to balances in other settlements and the rural area. The Draft Plan provides no rationale for limiting growth in the Regional Growth Centres whilst promoting rapid development in lower tier settlements.

In short, we believe that the targeted growth rate for Drogheda is too low, and the household allocation, with a significant target for brown field development has the potential to stifle much needed investment and presents as a cap on population growth. The Core Strategy projections as indicated with very high levels of growth being encouraged in lower tier settlements and the open countryside should be reconsidered to provide for higher levels of targeted growth in Drogheda. The justification for this is simply that Drogheda is the only Regional Growth Centre within the Core Region (as per RSES) with planned and committed DART links to Dublin City Centre.

Section 6 – Requested Changes:

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1. Include a strong unifying vision for Drogheda dispensing with references to Drogheda, South Drogheda Environs and North Drogheda Environs. There is only one settlement for consideration here.
2. Remove cap on population growth and residential development imposed by the Core Strategy and Housing Allocations which unnecessarily limit growth of this Regional Growth Centre to just 20%, contrary to national policy. Any Household allocation provided in respect of Drogheda should not be limited by extant permissions.
3. Remove the references at Section 2.13.6 to the unwieldy phasing arrangements in the 2006 variation to the 2004 Local Area Plan that have so limited the development of North Drogheda.
4. Remove the references to north Drogheda developing 'over a number of plans' at section 2.13.6
5. Include a spot objective on the Land Use Zoning Map for Drogheda, on the residentially zoned lands which overlap those areas at risk of flooding adjacent to the planned wetland park, indicating that development in these areas will be subject to flood risk assessment and that mitigation measures including compensatory storage within the wetland park, evidenced with appropriate modelling to demonstrate efficacy of any such proposals will be considered.
6. Provide a specific policy objective to achieve a new rail station in North Drogheda. There is potential for a second rail station in South Drogheda too presenting the possibility of Dart Links between residential areas like Grange Rath on the Dublin Road and Termon Abbey on the Termonfeckin Road.
7. Remove H1 Zoning through the north Drogheda environs residential area and provide specific objectives regarding the delivery of a linear park.

Summary and Conclusion

It is respectfully submitted that Drogheda, as a regional growth centre should have a more ambitious growth target, in line with National and Regional Policies.

We understand that following adoption of the County Plans by Louth and Meath County Council's a joint Urban Area Plan will be prepared for Drogheda. The scope and extent of that plan is yet to be determined. In our opinion, it is imperative that the new county development plan should clearly set out Louth's vision for its largest town.

Yours Faithfully

Brian Hughes
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Submission prepared by

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