

Forward Planning Unit.
Development Plan Review.
Louth County Council,
Town Hall,
Crowe Street,
Dundalk A91W20C
Co. Louth.

15th December 2020

Dear Sir/Madam,

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

**RE: SUBMISSION TO DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021 – 2027 ON
BEHALF OF MR. P. MCCOY, LANDS AT MARLEY’S LANE / RATHMULLAN ROAD,
(DROGHEDA LEISURE / LMFM) DROGHEDA, COUNTY LOUTH**

Mr. P. McCoy has retained Van Dijk Architects of Mill House, Mill Street, Dundalk, County Louth and Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House, Jocelyn Street, Dundalk, County Louth to make this submission relating to lands at the junction of Marley’s Lane and Rathmullan Road, Drogheda County Louth (known as Drogheda Leisure / LMFM). Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited.

To assist Louth County Council in complying with the provisions of the Data Protection Act full details of our submission on behalf of Mr. P. McCoy are attached.

Yours Faithfully,



Stephen Ward

Stephen Ward

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1.0 INTRODUCTION

1.1 The submission lands extend to 2.48 hectares and are identified edged red on the site location map below. The lands incorporate the existing neighbourhood centre lands off Rathmullan Road as well as the LMFM Building and the Drogheda Leisure Park buildings and attendant car parking areas. The proposal does not include or affect the Aura swimming pool building.

1.2 It is a central plank of this submission that these lands are a key opportunity site within the built-up area in the western part of Drogheda. With vacant units and extensive surface parking the lands represent underused brownfield lands. It is in the interests of the proper planning and sustainable development of the area for this site to be developed more intensely. In order to release the full potential of these lands a zoning change is needed in the new Development Plan for the area.

1.3 All services including drainage, infrastructure and utilities are available to the site and the site has permitted and established accesses to the adjoining public roads including Rathmullan Road and Marley's Lane.

1.4 The lands are affected by a number of zoning objectives in the Draft Plan, namely B2 – Neighbourhood Centre, E1 – General Employment and G1 – Community Facilities. These zonings affect various parts of the site and are acting to inhibit the preparation of a comprehensive rejuvenation masterplan for the lands. It is considered that the application of a single zoning objective, namely C1 – Mixed Use would allow the design and use flexibility to allow the creation of a vibrant and active area.

This submission seeks the rezoning of the lands edged red on the Site Location Map below from B2 – Neighbourhood Centre, E1 – General Employment and G1 – Community Facilities to C1 - Mixed Use and the application of a 'Spot Objective' for the lands to encourage rejuvenation of the site for a broad mixed use area incorporating residential and supporting residential uses as well as neighbourhood, commercial and community / leisure / recreation and employment uses in the Development Plan.

1.5 The current zoning provisions are hindering the evolution of the site to become a centrepiece for active community activity in this part of Drogheda. Development in place and the zoning provisions as applied limit the range of uses that can be accommodated at different parts of the site. As presently formulated best use of this key urban site is not possible.

2.0 PLANNING HISTORY

2.1 The suitability of the lands for mixed uses has been recognised as far back as 2003. The development was originally permitted in 2004 following a first party appeal under PA Ref 03/281 An Bord Pleanála Ref PL54.208394. In deciding to grant planning permission for the proposed development comprising a leisure centre and neighbourhood centre with associated car parking, the Board in its "Reasons and Considerations² for granting the proposed development stated as follows –

2.2 *Having regard to the pattern of existing and proposed development in the vicinity, including the significant quantum of new residential development and provision of a new swimming pool on adjoining lands, the proposed development subject to compliance with the conditions set out below, would provide certain facilities appropriate to serve the needs of residents of the area, and would be in keeping with the emerging pattern of development in the vicinity. It is further considered that the proposed development would be acceptable in terms of traffic safety and convenience and protection of the amenity of property in the vicinity. Therefore the proposed development would be in accordance with the proper planning and sustainable development of the area”.*

2.3 Further evidence of the suitability of the site for more intense and wider ranging uses is found at PA Ref 11/88, An Bord Pleanála Ref PL54.240365. In this case, granted permission is 2012, following a third party appeal An Bord Pleanála confirmed the decision of the Planning Authority and granted planning permission subject to 11 conditions for the following proposed development –

“Construction of a three-storey building to cater for primary care services and an associated doctor’s surgery suite at ground floor level. Development will also include revisions to existing car parking layout, a retaining structure, external secure storage and associated site works, all at Marley’s Lane, Drogheda, County Louth.

2.4 In the case of PL54.240365 the Board stated its reasons and considerations for granting permission as follows –

“Having regard to the zoning objective for the application site in the Drogheda Borough Council Development Plan 2011 – 2017, the Board considered that the proposed use of the site would be permissible and in accordance with the health care policies of the Development Plan. The Board further considered that the proposed building would, subject to compliance with the conditions set out below, not injure the visual amenities of the area and would not seriously injure traffic safety and convenience. Accordingly, the proposed development would be in accordance with the proper planning and sustainable development of the area”.



3.0 SITE CONTEXT AND SETTING

3.1 The site is located at the junction of the Rathmullan Road and Marley's Lane. Drogheda Fire Station is immediately east and St. Oliver's Community College is immediately west on the opposite side of Marley's Lane. St. John's Primary School is located south along Marley's Lane and there are also employment areas in the vicinity of the submission lands.

3.2 The submission lands are in close proximity to extensive residential areas on the Rathmullan Road and Marley's Lane. It should also be highlighted that lands just beyond the town boundary, in Meath are zoned for residential development and some of these are under construction. A Strategic Housing Development Application for 661 dwellings further west was permitted by An Bord Pleanála and whilst this decision was quashed by the High Court following judicial review proceedings, the decision was quashed on procedural matters rather than any issue of principle. In that light it is reasonable to assume that a further application will be made on these SHD lands. In any event the SHD application confirms that these residentially zoned lands can accommodate c660 dwellings.

3.3 Overall, and following interrogation of Small Area Statistics it is estimated that there is a population of 6,500 within a 10 to 15 minute walk of the submission lands. In addition there are 148 dwellings under construction and the SHD site could accommodate over 600 dwellings. The SHD site is c1km west of the submission lands.

3.4 It is noted, notwithstanding the population and housing in the vicinity of the lands there is very little in terms of neighbourhood facilities to serve such a large local population catchment. There is only a very small neighbourhood centre at Ballsgrove to the east of the site and very little opportunity to increase the level of service provision for surrounding housing development other than at the submission lands.

3.5 Immediately east and south of the lands are playing pitches (St. Nicholas GFC and Grove Rangers FC / Drogheda Boys FC. Interestingly the buildings on the submission lands back onto these areas as to schools to the south and houses to the east. The outcome of this is that these football pitches are not passively overlooked or supervised which can contribute to anti-social behaviour.

3.6 The range of uses on the site are limited by the zoning provisions that currently apply. Most of the buildings are large footprint low intensity use buildings and these contribute to the lack of vitality and vibrancy at the site. A mixed use zoning would allow more intense uses such as residential and supporting residential uses such as retirement housing, sheltered housing and supported living accommodation to be provided at the site. Such uses would encourage far greater activity at the site than is presently the case. In addition, the mixed use zoning would allow more intense employment uses on the site including, for example employment hubs and co-working spaces. All these uses combined would bring a new lease of life to the site and my implication to the surrounding areas.

3.7 Given the pattern of development that surrounds the lands, including that the lands are bounded by roads on two sides and by open spaces on the other two sides, the submission lands are very well suited to higher intensity development without causing harm to visual or residential amenities.

4.0 THE ZONING PROPOSALS AND COMPLIANCE WITH THE POLICIES OF THE DRAFT PLAN

4.1 Strategic Objectives - Drogheda is a designated Regional Growth Centre and the town is planned to grow to a population of at least 50,000 by 2031. Mixed use areas such as that proposed in this submission will form an essential part of the support system for the expected population and housing growth in the settlement. As noted and as far back as 2003, An Bord Pleanála has already confirmed the suitability of the site for mixed use development having regard to the pattern of expected population growth and housing development in the area. In addition to development since that time there are c148 dwellings under construction to the west of the site and a further probability (subject to re-lodging of the SHD application) of c600 or more houses further west but within 1 kilometre of the site. Combined, these development could add a further 1,870 to the population within a 10 to 1`5 minute walk of the site.

4.2 Strategic Objective SO2 of the Draft Plan states –

“SO2 – Support and promote the role of Drogheda and Dundalk as key designated Regional Growth Centres with high levels of self-sustaining employment and services, to act as regional economic drivers, playing a significant role for a wider catchment area to help achieve a more coordinated and sustainable settlement and travel pattern across the region”.

4.3 Clearly, the intention of the Development Plan is to see rapid housing growth in Drogheda and an increase in the provision of services is necessary to mirror this population and housing growth. As noted, the area around the submission lands is already experiencing population growth and it is our contention that the submission site offers an ideal location for the provision of mixed use services to serve the growing population.

“SO8 – Develop and support vibrant, inclusive, sustainable and healthy communities in Louth where people can live, work, invest and visit, enjoying access to a wide range of community, health and educational facilities and amenities, suitable for all ages and needs, in both urban and rural locations, thereby supporting a high quality of life for all to enjoy”.

4.4 The Role of Brownfield Land – In line with national and regional policy the Development Plan strongly promotes efficient use of land within urban areas and in particular promotes development on Brownfield lands. The submission lands are underutilised and need to be reinvented by higher density and more varied uses on them. A selection of the policy objectives of the Plan that promote good and efficient use of land within built up areas are set out below in order to emphasise the importance of that policy provision and to also emphasise how more varied and intense uses on the submission lands are fully in keeping with the policies of the emerging Plan for the County and for Drogheda.

4.5 Policy Objective CS2 – *“CS2 To achieve compact growth through the delivery of at least 30% of all new homes in urban areas within the existing built footprint of settlements, by developing infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites”.*

4.6 Policy Objective CS3 – *“To support and manage the self-sufficient sustainable development of all settlements in a planned manner, with population growth occurring in tandem with the provision of economic, physical and social infrastructure”.*

4.7 Policy Objective SS10 – *“To manage the growth of Drogheda in a manner that will achieve the creation of a compact settlement with attractive and inclusive sustainable neighbourhoods where there is a choice of affordable homes for all”.*

4.8 Sustainable Neighbourhoods – Section 3.6 of the Draft Plan deal with sustainable neighbourhoods and communities. It notes –

“The Draft Plan seeks to support the continued development of sustainable neighbourhoods and communities throughout the County. It will facilitate employment creation and economic investment in locations that would reduce journey times to work. It will promote healthy living by encouraging compact growth and the development of infill and brownfield sites in preference to edge of centre greenfield locations, and promote quality residential developments with a suitable mix of housing in proximity to local services and community and recreational facilities”.

4.9 The following policy objectives are derived from the below supporting text –

Policy Objective HOU10 – *“To continue to support the creation of sustainable communities throughout the County by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where walking, cycling and public transport is prioritised”.*

Policy Objective HOU11 – *“To encourage and support as range of appropriate uses in town and village centres that will assist in the regeneration of vacant and under-utilised buildings and land and will re-energise the town and village centres, subject to a high standard of development being achieved”.*

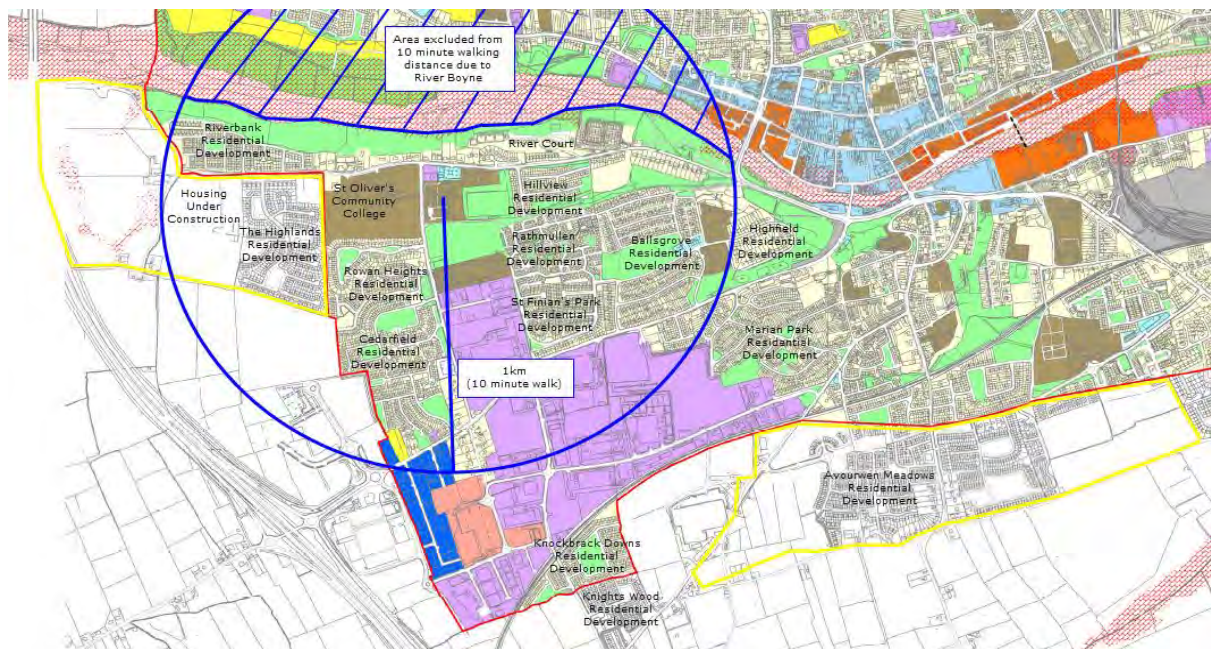


Figure 1 - Existing and Emerging Housing in Proximity to Submission Lands

4.10 Social Inclusion – Chapter 4 of the Draft Plan considers community facilities and social inclusion. It is submitted that the rezoning of the lands as sought in this submission would also contribute towards increased levels of social inclusion in the area. This is because the mix of uses that would be facilitate at the site would act as a better focal point for community interaction in the area.

4.11 For example Para 4.2 of the Draft Plan states – *“Social inclusion is a key objective at National Regional and Local level. It refers to the way in which everyone in a community is integrated in an equal manner by reducing the barriers to participation”*.

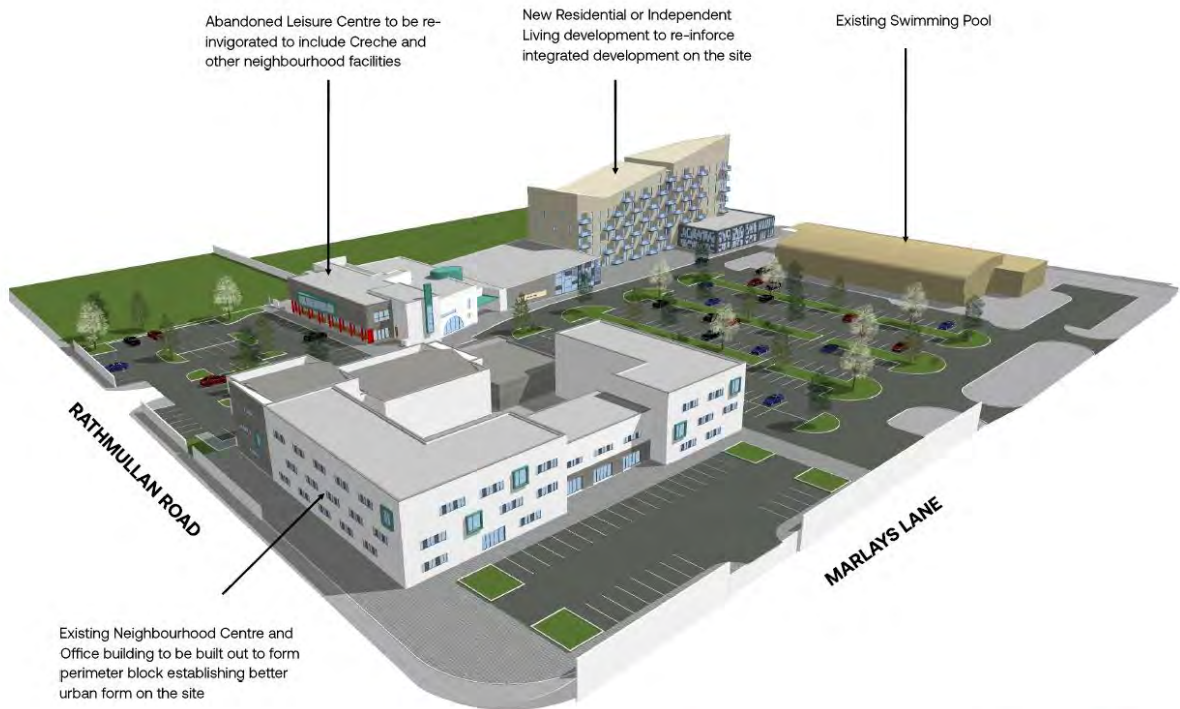
4.12 Unfortunately the Bowling and indoor football pitches were not commercially viable and they closed a number of years ago. They will not be commercially viable into the future and will be reopening. All weather out-door ‘five-as-side’ pitches have been provided at the Drogheda Boys FC facility just to the south and there are playing pitches to the east and south and also at St. Oliver’s Community College. There are sufficient playing pitches in the area, including an all-weather five-a-side floodlit pitch just to the south. Taking this into account the proposed rezoning will not conflict with Policy Objectives SC8 or SC14 of the Draft Plan which aims to resist the loss of pitches unless alternatives are available. In any event, more intense use of the submission lands are justified given their location proximate to residential and employment areas as well as existing sports playing pitches.

5.0 DESIGN CONSIDERATIONS

5.1 The landowner has engaged Van Dijk Architects to develop visual impressions on how a rejuvenated centre might look and these images are set out below. It is evident that the proposed zoning changes that would facilitate buildings of the type indicated on the Van Dijk Architect images below. These buildings would provide buildings of high quality architectural merit using quality materials and finishes. From the point of view of urban design the zoning change would allow taller buildings that are needed on a site such as this increasing the sense of place and with a much stronger urban form and edge definition. The buildings would give the complex a strong visual focal point in the area.

5.2 From the point of view of the surrounding area it is noted that the site is relatively unconstrained so that taller buildings can be accommodated without causing harm to the residential or visual amenities of the area. The site is bounded by roads on two sides and by playing pitches on the other two sides. Taller buildings and a broader mix of uses also gives the complex a stronger visual presence in the area and will also generate much needed activity and “footfall” to the complex.

Image 1 - View from North-West



DROGHEDA LEISURE REJUVENATION MASTERPLAN



Image 2 – View from South-West



DROGHEDA LEISURE REJUVENATION MASTERPLAN



Image 3 - View from North



DROGHEDA LEISURE REJUVENATION MASTERPLAN



Image 4 - View from West

Existing Neighbourhood Centre and Office building to be built out to form perimeter block establishing better urban form on the site

Abandoned Leisure Centre to be re-invigorated to include Creche and other neighbourhood facilities

New Residential or Independent Living development to re-inforce integrated development on the site



Existing Swimming Pool

MARLAYS LANE

DROGHEDA LEISURE REJUVENATION MASTERPLAN



Image 5 - Aerial View**6.0 SUMMARY AND CONCLUSION**

6.1 It is contended that the submission lands are ideally suited to act as a mixed use centre of quality for the surrounding area as well as the emerging population within 1km of the site. At present the submission lands are under-utilised and represent poor use of urban land within the settlement boundary of Drogheda.

6.2 Zoning of the lands for mixed uses would allow taller buildings of a much more urban scale to be developed on the site allowing the site to become a visual and functional focal point for the area with a strong and vibrant feel and make much more efficient use of urban land whilst respecting the visual and residential amenities of the area.

6.3 Taller buildings and a broader mix of uses including residential, supporting residential uses, neighbourhood, community, leisure, recreation and employment would be accommodated on the site under a mixed use development.

6.4 The proposals in this submission seek to replace the 3 zoning objectives that presently affect the lands with a single zoning objective (C1 – mixed Use) so that a comprehensive rejuvenation proposal can be developed with the creation of a vibrant mixed use centre as the core objective.

Yours Faithfully,

Stephen Ward