

21st December 2020

Draft Louth County Development Plan 2021-2027
Forward Planning Unit,
Development Plan Review,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth,
A91 W20C.

Submitted via email

Our Ref: 501.00180.00141.32 (BE) L

Your Ref: Draft Louth County Development Plan 2021-2027

Dear Sir/Madam

RE: DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

SLR Consulting Ireland acts as planning and environmental advisors to Belgard Estates Ltd., . This submission relating to the Draft Louth County Development Plan 2021 – 2027 has been prepared on their behalf.

BELGARD ESTATES LIMITED

Belgard Estates Ltd. is a 100% subsidiary of CRH Plc and manages the property assets of CRH Plc. In Ireland. Belgard Estates Ltd. is also involved in the acquisition and sale of land and properties.

CRH Plc. Was formed in 1970 following the merger of Roadstone and Cement Ltd. and is the leading global diversified building materials business in the world, employing 79,200 people at 3,100 locations worldwide.

Belgard Estates Ltd. have three property assets located in Drogheda, within the Louth County Council administrative area, which are:

- Mell
- Old Slane Road
- Cement Road

These landholdings are shown on the figure below.

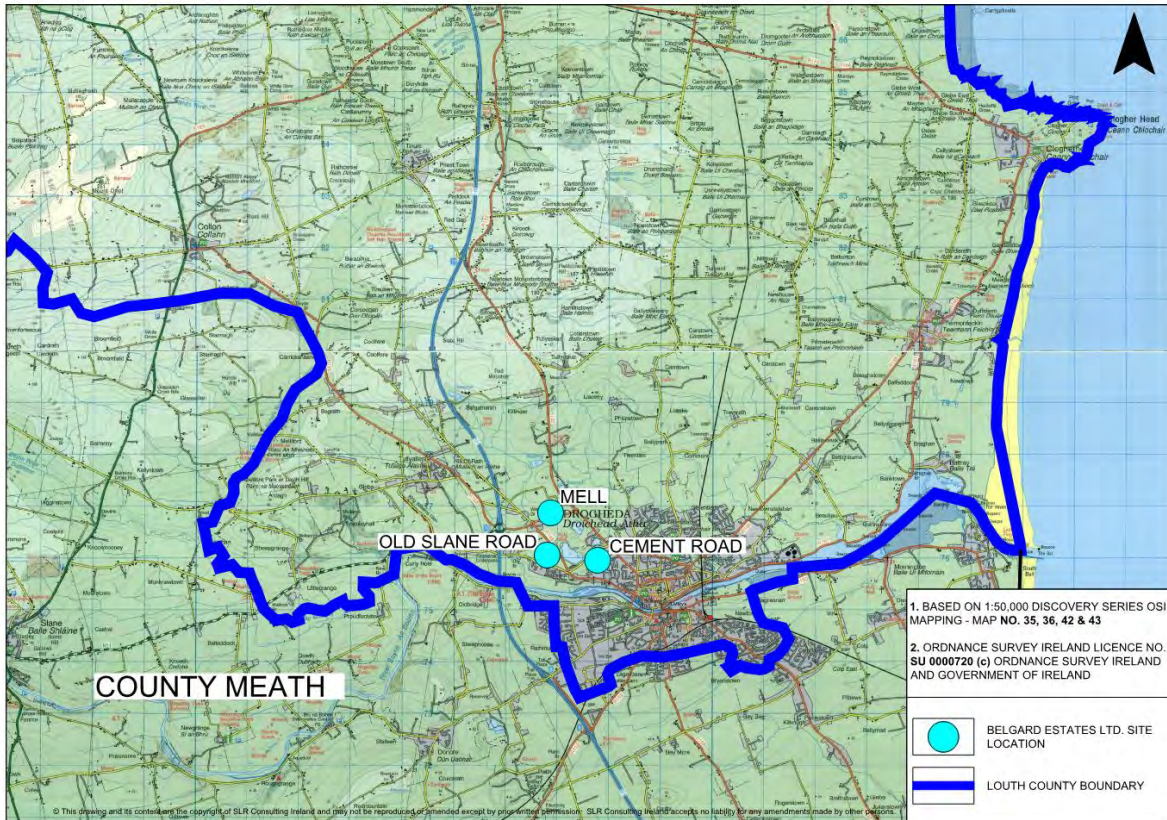


Figure 1: Belgard Estates Ltd. – Property Locations in County Louth.

BASIS OF THE SUBMISSION

National and Regional Policy Context

National Planning Framework

Project Ireland 2040, the National Planning Framework (NPF) highlights the significance of Drogheda in its vision for the country and a targeted pattern for growth. As highlighted above, the Mell, Old Slane Road and Cement Rd. lands are located in the Drogheda area.

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 (RSES)**”.*

It is a policy objective of the NPF to build stronger regions and accessible centres of scale and for the purposes of same, the significance of the RSES is very much emphasised in the document, describing it as a framework for the Eastern and Midland Region.

The NPF also states that it will be necessary to **prepare co-ordinated strategies** for Dundalk and **Drogheda at both regional and town level to ensure that they have the capacity to grow sustainably and secure investment as key centres** on the Drogheda-Dundalk-Newry cross-border network.

National Policy Objective 7 is also of significance, which describes applying 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 the Letterkenny-Derry North-West Gateway Initiative and **Drogheda-Dundalk-Newry on the Dublin-Belfast corridor**”.*

Furthermore, regarding working together for economic advantage, **National Policy 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**”.*

National Policy Objectives 2b, 7 and 44 recognise the **key regional role of Drogheda** within the Drogheda-Dundalk-Newry cross-border networks and are to inform the relevant Regional Spatial and Economic Strategies, which in this case is the Eastern Midland Regional Assembly (EMRA) RSES. The extent to which these towns should target future growth are determined at regional level in the context of the NPF.

Regional Spatial and Economic Strategy (Eastern Midland Region)

The principal purpose of the RSES is to support the implementation of the NPF and the economic policies and objectives of the Government as contained in the National Development Plan (NDP) by providing the long-term strategic planning and economic framework for development of Ireland's regions.

The RSES 2019-2031 for the EMRA recognises that while Dublin is at the forefront of international competition for investment, the NPF encourages significant regional concentration towards the second-tier cities of Cork, Limerick, Galway and Waterford and some **regionally important larger settlements**, such as Athlone, Dundalk and **Drogheda**.

In this regard, **Regional Strategic Outcome 1 'Sustainable Settlement Patterns'** is provided which aims to,

*Better manage the sustainable and compact growth of Dublin as a city of international scale and develop Athlone, Dundalk, **Drogheda** and a number of key complementary growth settlements of sufficient scale to be drivers of regional growth. (NSO 1, 7, 10)*

Furthermore, it is described that there exists the desire **to target significant growth in these Regional Growth Centres, including Drogheda**, 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 (UAPs).

It is stated that the cross-boundary coordination along the Dublin - Belfast Economic Corridor and to the Rosslare Europort is a significant element of the strategy and will be even more so with the onset of Brexit, playing a critical role in supporting economic growth and competitiveness. The Dublin-Belfast Economic Corridor is the largest economic agglomeration on the island of Ireland with the cities and towns along the Corridor home to a population of around 2 million. It is acknowledged that the Corridor connects the large towns of **Drogheda**, Dundalk and Newry by high-capacity national road and rail links, major airports of Dublin Airport, Belfast International Airport and Belfast City Airport and Belfast and Dublin ports. The Eastern Corridor extends south to Rosslare Europort, which is an important economic and transport link, particularly in the post Brexit scenario. The RSES supports a feasibility study for high speed rail between Dublin and Belfast and enhanced rail services on the south-eastern line to include the **extension of DART services to Drogheda**.

The **Core Region** is also highlighted as an important element of the strategy. More than 550,000 people reside in the Core Region (2016 census) and contains some of the youngest and fastest growing towns in the state. It emphasises the strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations but a wider catchment area. This includes Drogheda and it is stated that these towns have capacity for continued commensurate growth to become more self-sustaining and to attract high quality knowledge based employment at strategic accessible locations.

*As a Growth Enabler for the Core Region it is stated that **Drogheda should 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. **Regional Growth Centres** are defined in the RSES **as large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.***

The vision for **Drogheda** is to reach a **target population in the region of 50,000 by 2031**. Significantly, **Drogheda is identified as the fastest growing town in the country** in the most recent inter-census period. Drogheda's location on the Dublin-Belfast Economic Corridor, combined with its existing physical, economic and social asset base, provides significant sustainable growth potential. If promoted, this latent potential can help to realise the growth potential of the broader Drogheda-Dundalk-Newry cross-border network as an engine for sustainable regional development.

The objective for Drogheda 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 dynamic of securing investment, while driving synergies between the Drogheda-Dundalk-Newry cross border network and building on the existing education and skills base in the region are promoted within the Strategy period.

Regarding employment opportunities the RSES describes that Drogheda shall promote further employment growth based on the attractiveness of its assets and the quality of life offering for workers and residents. This can include additional employment opportunities, including high value jobs, to provide for a greater jobs to residents ratio. The establishment of The Mill in Drogheda hosting numerous start-up companies highlights the existing pool of entrepreneurial talent present that will continue to be supported and developed. There is also potential with the Drogheda Institute of Further Education (DIFE), enhancing the educational offer in the north east. The retention of indigenous talent can be achieved by providing appropriate and career advancing employment opportunities locally or in sustainable urban centres of scale.

It is described that In order to enhance co-ordination of development in Drogheda where the town and its environs lie within the combined functional area of two local authorities, the preparation and **adoption of a statutory Joint Urban Area Plan (UAP)**, to be jointly prepared by Louth County Council and Meath County Council will be a priority. The UAP will provide for a coordinated planning framework to identify and deliver strategic sites and regeneration areas so that a minimum of 30% compact growth can be achieved. There is also a requirement for both a transport strategy and a retail strategy to be prepared as part of the joint UAP process in order to coordinate land use and transportation and to provide for sustainable retail development in Drogheda and its hinterland.

It is stated that in tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework the **joint UAP for the Regional Centre of Drogheda** should endeavour to support and provide for a number of objectives, the following of which are relevant to this submission,

- 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.

In addition the following Regional Policy Objectives (RPO)s related to Drogheda as a Regional Growth Centre are relevant to this submission,

RPO 4.11: 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.*

RPO 4.13: *Promote and enhance cross-border interactions to realise the growth potential of Drogheda-Dundalk-Newry as an important crossborder network for regional development.*

RPO 4.14: *Promote self-sustaining economic and employment-based development opportunities to match and catch-up on rapid phases of housing delivery in recent years to provide for employment growth and reverse commuting patterns.*

RPO 4.18: *Enhance Drogheda's role as a strategic employment centre on the Dublin-Belfast Economic Corridor and provide for employment opportunities through identification of suitable sites for new industry including FDI.*

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021 - 2027

Drogheda as a Regional Economic Driver and the requirement for Master Plans for Employment Lands

The Draft Louth County Development Plan 2021-2027 (CDP) states that it sets the Council's overall strategy for the proper planning and sustainable development of County Louth in accordance with the Planning and Development Act 2000 (as amended). It is described that the Draft CDP represents a step change from the current Louth County Development Plan 2015-2021, for a number of reasons, which relate primarily to changes enacted at national and regional level and legislative amendments. ***The cumulative impact of the principal changes has a major impact on this Draft County Development Plan and none so profoundly as to the recognition afforded to the towns of Drogheda and Dundalk therein.*** The following provides an outline of the key policies and objective within the Draft CDP that are considered relevant to this submission.

Drogheda currently has a population of 34,199 persons and this is expected to grow to 41,113 persons by 2027. The Draft CDP highlights policy objectives related to regional growth centres and population targets. Those relevant to this submission are as follows,

CS 6 Direct and consolidate the majority of the County's future population growth into the strong and dynamic Regional Growth Centres of Drogheda and Dundalk in line with the objectives of the Regional Spatial and Economic Strategy and in accordance with the Core and Settlement Strategies of the Development Plan.

CS 7 Support the Regional Growth Centres of Drogheda and Dundalk as regional economic drivers targeted to grow to city scale with a population of 50,000 by 2031 and capitalise on their strategic location on the Dublin-Belfast Economic Corridor.

CS 8 To promote and support the sustainable development of the Dublin-Belfast Economic Corridor, safeguarding and improving accessibility and service by road, rail and communication and enhancing cross border interactions to realise the growth potential of Drogheda-Dundalk-Newry as an important cross-border network for regional development.

CS 9 To prioritise the preparation of a Joint Urban Area Plan (UAP/LAP) for Drogheda in partnership with Meath County Council, which will incorporate the existing local area plan areas affecting the wider town environs into one overall planning framework for the Regional Growth Centre of Drogheda. The preparation of the UAP/LAP will be informed by a local transport plan, in accordance with the requirements of Regional Policy Objective 4.11 of the Regional Spatial and Economic Strategy.

Significantly, within the area designated the ***Northern Environs of Drogheda*** it is noted that there is an ***extensive land bank of employment, residential, and community zoned lands in the Northern Environs of the Town. 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. The Port Access Northern Cross Route (PANCR) is a critical piece of infrastructure in the Northern Environs that will ensure the comprehensive and cohesive development of this area while also facilitating the regeneration of key sites within the town centre.

It is stated that it is important that the build out of these lands is coordinated so that the necessary social, community, and recreational infrastructure is provided in tandem with residential

development. 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.

It is further stated that 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.

The development of these lands is closely linked to the provision of roads, new streetscapes, pedestrian and cycle networks and water services infrastructure which will allow the Council to manage the phased release of the lands. The following strategic policy objective for Drogheda is provided in this regard,

***SS11** To support the coordinated development of the Northern Environs of Drogheda with the provision and delivery of sustainable social and community facilities and infrastructure in tandem with residential development.*

Furthermore, regarding **Undeveloped Employment Lands**, it is described that there are two large parcels of undeveloped lands zoned for employment uses to the north of the town. These are located **adjacent to the M1 Retail Park** and opposite Tom Roes Point ferry terminal.

A Master Plan will also be required for the employment lands in the vicinity of the M1 Retail Park. Provision of the aforementioned Master Plans will ensure a holistic and co-ordinated approach is taken to the development of the lands. These Master Plans will set out a conceptual layout and provide infrastructural details including roads, water services, and surface water in addition to a phasing programme for the build out of the lands.

The following Economy and Employment policy objective is also provided in this regard,

***EE 35** To support the development of employment lands in the town including:*

- i) The lands in the northern part of the town adjacent to the M1 Retail Park*
- ii) The lands opposite Tom Roes Point ferry terminal*

*The development of these lands shall be for economic investment and employment generating uses. **No development shall take place in the absence of a Master Plan being agreed in writing with the Planning Authority.***

Chapter 13 **Development Management Guidelines** provides guidance for **Master Plans** which states that the purpose of a Master Plan is to provide a vision and conceptual guide for the long term development of a large and/or strategically located area of land, where there is a co-ordinated framework for the planning, phasing, and construction of the lands. It is further described that Master Plans can be particularly useful in circumstances where lands are in multiple ownership, as it can enable a common approach for the development area to be agreed.

It is intended that the design and construction of a development area in accordance with an agreed Master Plan will ensure that ad hoc and piecemeal development is avoided and that the required infrastructure, services, and facilities are delivered in tandem with any residential, commercial, or employment development.

Significant to this submission, it is further stated that,

Master Plans shall be prepared by landowners/developers and agreed with the Council. Depending on the size of the land parcel, the land use zoning(s), and infrastructural requirements, the level of detail required in a Master Plan will vary. The following information shall be included:

- *Master Plan Area in hectares and a breakdown of land use of each land use zoning by area;*
- *Details of landowners in the Master Plan Area;*
- *Conceptual layout and design brief;*
- *Key challenges in the development of the Master Plan area;*
- *Building types and design (approximate unit numbers for residential development and commercial floor space/building heights in a mixed use development);*
- *Connectivity and permeability including pedestrian, vehicular, and cycle access;*
- *Service arrangements including water, wastewater, and surface water;*
- *Any potential upgrades to infrastructure required to facilitate the development of the Master Plan area;*
- *Any potential environmental constraints such as flooding, archaeology, or the location of the Master Plan within or in proximity to a European Site;*
- *The proposed phasing arrangements for the development of the Master Plan Area including the provision of necessary community or physical infrastructure in tandem with residential or commercial development; and*
- *Any other information considered necessary.*

The Council will endeavour to work closely with key stakeholders including landowners, developers, and infrastructure agencies to progress Master Plans and secure the development of the Master Plan area.

Moreover, it is described,

that in the larger settlements of the County, there are large parcels of undeveloped lands zoned for residential and employment uses. A Master Plan will normally be required to be agreed on these land blocks, to ensure there is a framework in place setting out how the area will be developed. This includes access points, internal road layouts, sustainable transport provision, connectivity and permeability with surrounding areas, water services infrastructure, open space provision, and the design and layout of buildings. Landowners or developers shall engage with the Council at the early stage of the design process to determine if a Master Plan is required. The larger Master Plan Areas in the County are outlined in Table 13.1.

SUBMISSION COMMENTS

The following outlines the key points that Belgard Estates Ltd. would like to address in relation to the proposed Draft Louth County Development Plan 2021 – 2027.

Mell Lands – Submission Points

Site Context and Landuse Zoning

The subject site is located within the townland of Mell, approximately 2.3km north west of the Drogheda’s town centre. It is accessed by the N51, which connects to the M1 motorway to the west of the subject site, and the R132 to the east to the east of the subject site. Significantly, the landholding lies adjacent to the M1 Retail Park. This is illustrated through the figure below.



Figure 2: The Location of the Subject Site, highlighted in a red dash line, within the townland of Mell, Co. Louth, adjacent to the M1 Retail Park.

Furthermore, within the proposed Draft Louth County Development Plan 2021 – 2027, the lands of the subject site have been zoned ***‘General Employment (E1)’*** with the objective ***“To provide for general enterprise and employment generating activities”***. The following figure provides an illustration of the zoning class within which the subject site sits.

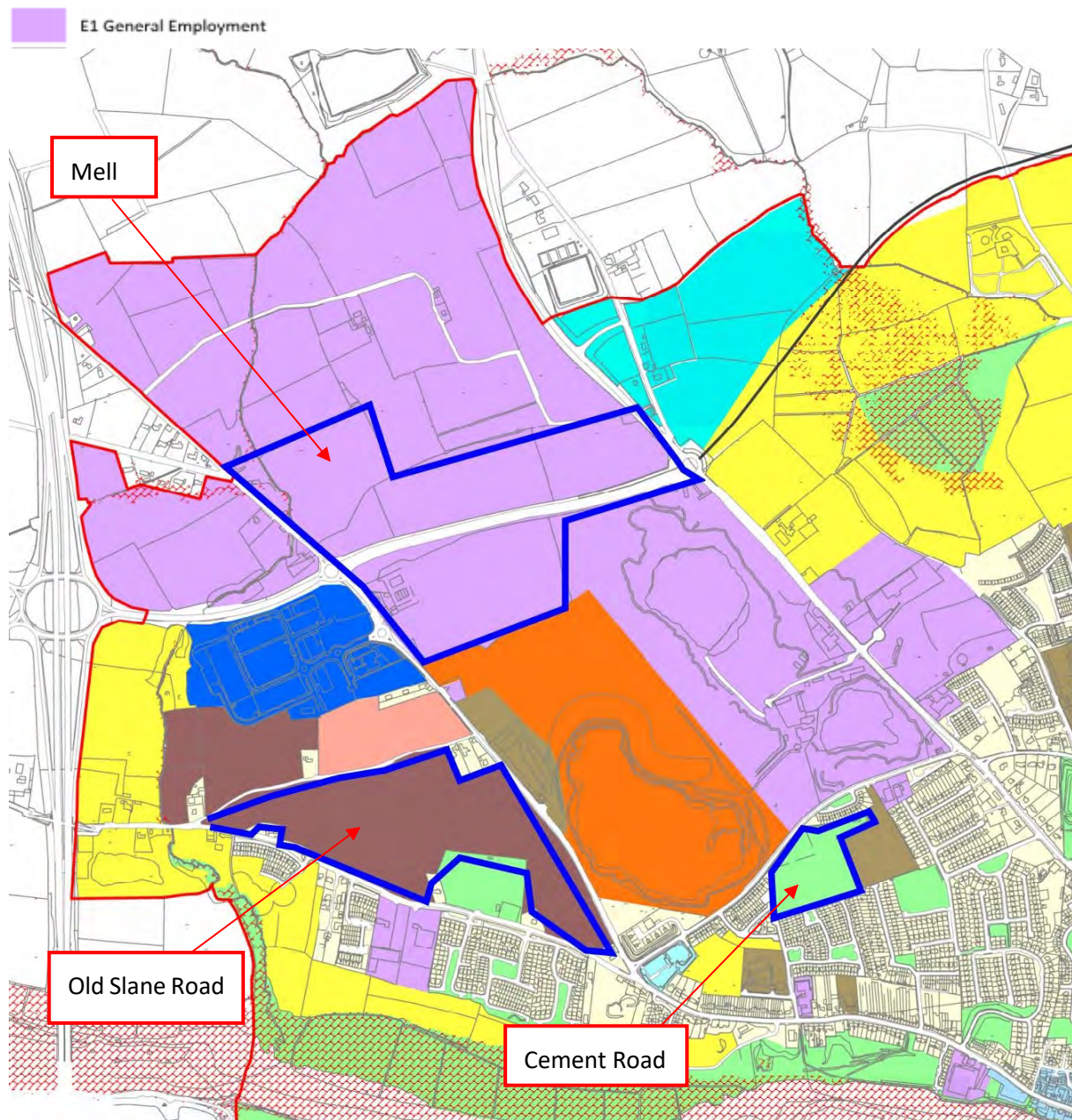


Figure 3: Extract of zoning map, identifying the subject site lands highlighted in blue and as zoned for general employment, mixed use and open space.

This zoning is the primary location for employment generating activities. It is to facilitate the improvement and expansion of existing employment areas and the investment and development of new employment areas. The CDP envisions that a wide range of uses will be facilitated on these lands including small, indigenous enterprises, general industry, manufacturing, food production, logistics, and warehousing. It is stated that the compatibility of a particular use or operation will be dependent on the nature of the use/operations and surrounding uses in the area in which the development will be located.

Belgard Estates Ltd. have reviewed the proposed land use zoning for the lands and support the proposed General Employment (E1) zoning.

Development Management – Requirement for Masterplan

It is considered that the proposed development management policy objectives regarding master plans for employment lands is restricting the development of the subject site lands and in turn, their employment potential. As set out in the draft CDP, there are two strategic areas of undeveloped lands zoned for employment uses to the north of Drogheda. One of these areas located at Mell comprises land parcels owned by multiple different landowners (including Belgard Estates Ltd.).

It is believed that a current draft policy objective with regard to the development of the proposed master plan for the overall area of zoned land at Mell, is unrealistic and subsequently does not support the county's objectives regarding the growth of Drogheda and establishing itself as a Regional Growth Centre. Both the subject Belgard Estates lands and the areas zoned for General Employment (GE) are significant in scale and it is considered that to develop a single master plan for such a vast area of land is impractical due to the significant number of landowners that would be involved in such a scenario.

It is therefore considered that the current draft policy objectives are not useful in their current form and restrict the ability to unlock the potential socio-economic benefits these lands hold for the county and the town of Drogheda. In this regard, it is submitted that these be re-considered to allow for a masterplan to be submitted for **any significant area within the zoned lands**, provided that of course it facilitates a framework and linkages for development of the wider zoned area. To allow for this, it is further submitted that policy **EE 35** be revised as follows:

EE 35 *To support the development of employment lands in the town including:*

- iii) *The lands in the northern part of the town adjacent to the M1 Retail Park*
- iv) *The lands opposite Tom Roes Point ferry terminal*

*The development of these lands shall be for economic investment and employment generating uses. **Development shall only take place in areas where a Master Plan has been agreed in writing with the Planning Authority. In the interest of supporting strategic regional and county objectives, Master Plan proposals for any significant area of employment zoned lands will be duly considered, and such proposals will not necessarily require incorporating the entirety of an employment zoned landbank.***

[Emphasis added]

It is further suggested the above proposed amendments be reflected in the development management standards regarding Master Plans, as described in section '**13.5 Master Plans**'. The current Draft CDP does not make it clear, that should a well-considered proposal for a Master Plan area be proposed, that the local authority will have due regard to same, regardless of its extent and scale and that it should not be required to cover the full extent of any zoned landbank, thus allowing for parcels of land to be excluded should reasonable rationale be provided. This of course should be done whilst in keeping with the key principle of Master Plans, which is to ensure a holistic and co-ordinated approach is taken to the development of the land.

Old Slane Road Lands – Submission points

Landuse Zoning

Belgard Estates Ltd. have reviewed the proposed landuse zoning for the lands and support the proposed 'Mixed Use (C1)' zoning, *which is* "to provide for commercial, business and supporting residential uses".

Development Management

It is stated that in considering proposals for mixed-use developments, minimising any potential conflict between uses, preserving, and protecting amenity will be key considerations. This includes issues such as air quality, noise, and security.

These lands shall provide for both commercial and business uses and the facilitation of residential uses as appropriate. Mixed-use developments that generate daytime and evening activities will be encouraged and supported, however an over-concentration of any one use will not normally be permitted. It is described that maintaining the existing urban character, quality of design, integration and links between uses and spaces are important considerations for new developments. Retailing will be considered in this zoning, provided that a sequential test in accordance with the Retail Planning Guidelines 2012 is carried out and the lands are demonstrably the optimum location for the nature and quantum of retail development proposed. The design and layout of any residential development shall be of a high quality. The compatibility of any commercial, business, or retailing use or operations with a residential development shall be taken into account in the layout and configuration of any development on these lands.

Belgard Estates Ltd. are in accordance with the development management guidance proposed.

Cement Road Lands – Submission Points

Landuse Zoning

Belgard Estates Ltd. have reviewed the proposed landuse zoning for the lands and support the proposed 'Open Space (H1)' zoning, *which is* "to preserve, provide and improve recreational amenity and open space".

Development Management

It is described that this zoning refers to areas of 'active' and 'passive' open space. Development that will improve the facilities or quality of the open space, amenity or recreational facilities, or contributes to the enjoyment of the space will be considered.

Belgard Estates Ltd. are in accordance with the development management guidance proposed.

CONCLUDING REMARKS

This submission has described the key points that Belgard Estates Ltd. would like to address in relation to the proposed Draft Louth County Development Plan 2021 – 2027.

This is with particular regard to its property assets in Mell, Old Slane Road and Cement Road. The lands at Old Slane Road and Cement Road have been zoned 'Mixed Use (C1)' and 'Open Space (H1)', respectively. Belgard Estates Ltd. are in accordance with the proposed zoning of these lands and the proposed development management guidance attached to same.

With the regard to the lands at Mell, Belgard Estates Ltd. are in accordance with the proposed zoning of 'General Employment (E1)'. However, a review of the proposed policy objectives regarding Master Plans for such lands has been requested. The principle of Master Plans is understood and appreciated, as it ensures a holistic and co-ordinated approach is taken to the development of the lands. However, as described herein it is considered that the current draft policy objectives are not useful in their current form and restrict the ability to unlock the potential socio-economic benefits these lands hold for the county and the town of Drogheda. In this regard, it is submitted that these be re-considered prior to the publication of the final CDP.

Yours sincerely
SLR Consulting Ireland