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## RESPONSE TO LOUTH COUNTY COUNCIL'S DRAFT LOCAL DEVELOPMENT PLAN 2021-2027

I refer to your correspondence on 8<sup>th</sup> October 2020 providing notice of the preparation of the Draft County Louth Development Plan 2021-2027 and wish to thank you for the opportunity to comment.

The Council notes the Draft Plan represents a step change from the current Louth County Development Plan 2015-2021 for a number of reasons which primarily relate to changes enacted at national and regional level and legislative amendments. It is noted that the Draft Plan incorporates the entire County and when adopted will replace the Drogheda and Dundalk Area Plans with Urban Area Plans and Local Area Plans to be prepared during the lifetime of the Plan.

It is also acknowledged that the County has moved from a Border Region to the Eastern and Midland Region with the Regional Spatial and Economic Strategy designating Drogheda and Dundalk as Regional Growth Centres in acknowledgement of their growth potential as drivers of the regional economy. In this respect the Council welcomes the acknowledgement in the Draft Plan of the importance of the Dublin- Belfast corridor and in particular the promotion of cross border collaboration to realise the growth potential of Drogheda-Dundalk-Newry as a cross border network for regional development.

The Draft Plan's Growth Strategy is noted in that it seeks to promote sustainable and compact growth with a more integrated concept of development focusing population and economic growth primarily in the Regional Growth Centres of Drogheda and Dundalk while supporting the self-sustaining towns and having regard to the vitality and viability of the small towns and villages. It also acknowledges the need to manage the urban generated growth in rural areas under urban influence and seeks to achieve a balance of supporting rural communities and protecting the countryside.

It also seeks to capitalise on the strategic location of both Drogheda and Dundalk along the Dublin-Belfast corridor to drive linkages and synergies between the north and south of Ireland which is welcomed. The Draft Plan, in its strategy for economic development, acknowledges that the County's location also exposes it to the uncertainties surrounding Brexit with businesses having customers, supply chains and producers on both sides of the border. It highlights the potential critical mass of Drogheda- Dundalk- Newry to compete in the global economy and our continued joint working through the Memorandum of Understanding. It also notes the changing working environments such as co-working facilities and home-based activities that have been enabled as a result of advances in technology.

The Draft Plan seeks to support sustainable tourism development and strengthen the contribution it makes to the local communities, culture and economy of the County. Importantly it acknowledges

there is a fine balance to be struck between capitalising on the resources of the County whilst protecting them from harm and over development. It specifically references that the construction of the Narrow Water Bridge Project would be of immense and historical significance and that a primary objective is to facilitate improved cross-border access to the scenic beauty on both sides of Carlingford Lough. This is welcomed as it would support local economic and tourism development on both sides of the border.

With regard to Movement the Council notes the support for a shift towards more sustainable modes of travel such as electric vehicles, car sharing, public transport, park and ride/ park and share facilities, rural transport as well as walking and cycling. In this regard we welcome the continued commitment to developing and investing in the network of greenways in the County, and in particular the Great Eastern Greenway which is firstly proposed to extend to Newry.

The policy objectives for the protection, conservation and management of the natural environment and the built heritage are noted, as is the incorporation of the Green Infrastructure Strategy.

With regard to infrastructure and public utilities the Draft Plan recognises the impact of climate change and the increased risk of flooding. It acknowledges the importance of Sustainable Drainage Systems and Flood Risk Management through the inclusion of policy objectives. The Draft Plan also promotes energy efficiency and the development of indigenous renewable resources.

The Draft Plan sets out a strategy for the Environment, Natural Resource and the Coast and details policies relating to the conservation and enhancement of the County's environment. It promotes a balanced approach that supports growth while ensuring that adverse impacts are minimised. It acknowledges the changing nature of the coast and in this respect, given that the coast is a shared resource we would welcome further discussion in the future.

The Draft Plan seeks to transition to a low carbon and climate resilient County through a combination of mitigation and adaptation measures in response to climate change. Mitigation measures such as harnessing renewable energy resources, ensuring older buildings are brought up to the correct standards, driving more compact, connected development, supporting the migration towards low emission vehicles are to be employed to achieve a reduction in greenhouse gas emissions across key sectors. All of these measures are to be welcomed although we would highlight the need to consider the potential impacts on the environment, landscape, wildlife, visual and residential amenity as well as other planning considerations when considering renewable energy resource applications, particularly given the transboundary potential of impacts.

With regard to climate adaptation the Draft Plan in particular recognises the importance of integrated land use planning, green infrastructure and flood risk management. It is considered that the Draft Plan has comprehensively considered the impacts of climate change and the way in which the Development Plan aids mitigation and adaptation.

In conclusion, Newry, Mourne and Down District Council considers that the contents of your Draft Plan are not in conflict with the ongoing development of our own Draft Plan Strategy for the Newry, Mourne, and Down Local Development Plan 2030, which is currently in preparation. We note that

these are challenging times for both Councils with the uncertainty created not only by Brexit but also by the on-going COVID-19 global pandemic. However, we look forward to continued engagement with you on matters of common interest at the appropriate time in our respective work programmes.

Anthony McKay  
Chief Planning Officer