

Forward Planning Unit
Development Plan Review
Louth County Council
Town Hall
Crowe Street
Dundalk
Co. Louth
A91 W20C

[By: Online Consultation Portal:
louthcdp@louthcoco.ie]

21st December 2020

Dear Sir/Madam,

RE: SUBMISSION TO THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 IN RELATION TO LANDS KNOWN AS THE BOYNE MILL, DROGHEDA, CO. LOUTH

1.0 INTRODUCTION

1.1 Purpose of this Submission

Tom Phillips + Associates ('TPA'), Town Planning Consultants, have been retained by Silveroak (Greenhills) Ltd ('Silveroak') to provide town planning services in respect of a site known as the Boyne Mill, Drogheda, Co. Louth ('the subject site').

TPA have been engaged to make this submission to the *Draft Louth County Development Plan 2021-2027* (hereinafter the '*Draft Development Plan*') in relation to the subject site. The landowner, Silveroak, has been actively working on a development proposal for a mixed-use development, which would deliver significant physical, economic, social and conservation gains both to Drogheda, and its wider local and regional context.

The proposal would reinvigorate this underutilised urban site and provide much needed employment, housing, and tourist accommodation uses in an established urban area at the edge of Drogheda town centre.

The site accommodates the former Boyne Mill complex which comprises a number of important historical buildings and structures. The site is vacant and currently has no particular purpose. The existing older buildings have been examined to assess their importance, condition and potential for reuse (including new uses), and which could contribute to the redevelopment of the site. (Section 2.0 below provides a further site description.)

TOWN PLANNING CONSULTANTS



The Applicant has prepared a site-specific Masterplan, which was recently finalised, and this has been the subject of previous discussions with the Planning Department. The Masterplan demonstrates that the proposed redevelopment of the site will meet a variety of social needs. It will contribute to satisfying the demand for housing supply in this part of Drogheda as well as seeking to deliver important commercial employment and tourist accommodation uses. (See Appendix A, which includes key images and illustrations taken from the Masterplan.)

Importantly, the scheme will promote the development of a permanent community, resulting from a varied mix in tenure and a range of commercial uses.

The proposed development is consistent with the Council's policy objective to create and facilitate sustainable economic growth in Drogheda, so that it may continue to flourish in tandem with other key centres, thereby strengthening its position on the Eastern Corridor. The strategic importance of the Boyne Mill site is not currently recognised in the *Draft Development Plan*.

However, it is our view that there is now an important opportunity for the site to be better recognised in terms of including positive, facilitating planning policy in the new County Development Plan, which would assist the redevelopment of the site in planning terms.

The key motivation for making this submission, therefore, is to request the Planning Authority to make certain amendments to the *Draft Development Plan*, so that the future redevelopment of the Boyne Mill site is given clear policy support, and that it can be brought forward for delivery in the short-term.

The *Draft Development Plan* is currently on public display until 23rd December 2020 and this submission has been made prior to this date.

2.0 SITE LOCATION AND DESCRIPTION

The subject site is located at the edge of Drogheda town centre and comprises a large brownfield tract of land that was previously used as an old linen mill complex. There is an historic mill and associated chimney stack currently on the site (both Protected Structures) together with a number of other older industrial buildings, which have since fallen into disrepair. There are 5 no. Protected Structures on the site in total.

The site is bounded by the Greenhills Road (R899) and Beaulieu Mews (L2307) at its southern edge, which is also the location of the site's primary access point. The northern and northwestern boundary adjoins two established residential developments (Westcourt and Maple Drive).

The site is less than 100 metres north of the River Boyne and approximately 1.4km northeast of Drogheda Town Centre (a 18-min walk). The lands are primarily surrounded by established residential housing estates, public/private open spaces, and a mix of other uses, including manufacturing/warehouse facilities, retail and other services.

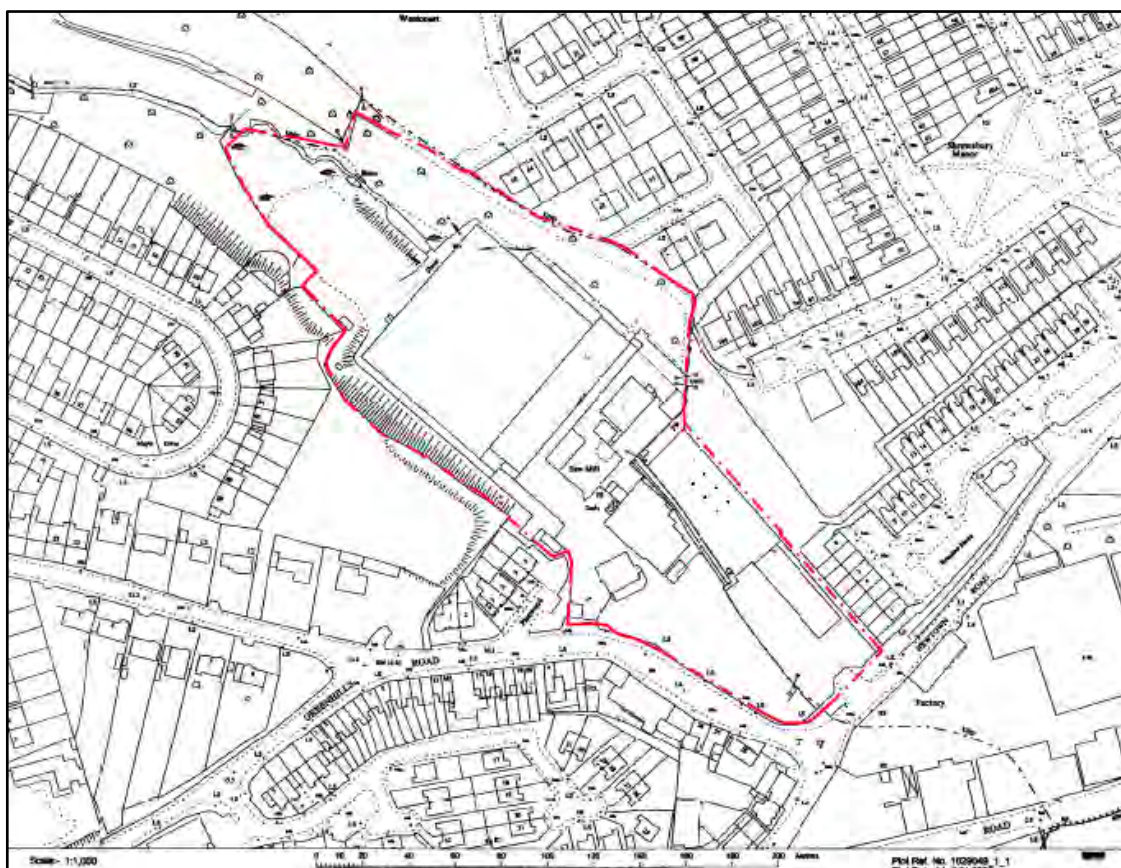


Figure 2.1: Site Location Map (source: Oppermann Associates, cropped by Tom Phillips + Associates)



3.0 OVERVIEW OF NATIONAL PLANNING POLICY; A REMIT FOR COMPACT URBAN GROWTH

The subject site is located within the inner suburbs of Drogheda town centre; an accessible area with a mixed urban character, but mainly residential land uses in the form of terrace, semi-detached and detached housing.

The site is within walking distance (i.e. up to 15 minutes or 1,000- 1,500m), of a principal town centre, and significant employment locations. The redevelopment of the site for mixed-use purposes, which is primarily commercial, residential and tourist accommodation development, is therefore fully in keeping with national planning policy. The local planning policy setting – which is prescribed via the Development Plan – should be fully consistent with the objectives of national policy, which is briefly outlined below, and highly relevant to the subject site:

- National planning policy promotes new residential development on urban lands, which are proximate to public transport corridors, in order to maximise the efficient use of scarce, zoned urban lands and related public infrastructure. There is a pressing need to increase housing output both nationally, and within the administrative area of Louth County Council. This is particularly the case for centrally-located and highly-accessible sites that are within walking distance of high-capacity public transport services, close to significant employment locations (such as the Drogheda town centre).
- In our view, a key consideration in terms of the proposed development being in accordance with the proper planning and development of the area, is therefore whether it is compliant with overarching national policy¹. *'Project Ireland 2040 – National Planning Framework' ('NPF')* is an important such document.
- The NPF states that *“a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on **infill** and/or **brownfield** sites.”*
- Furthermore, the NPF is *“targeting a greater proportion (40%) of future housing development to be within and close to the existing ‘footprint’ of built-up areas”* and to *“make better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and **vacant and under-occupied buildings**, with higher housing and jobs densities, better serviced by existing facilities and public transport.*
- The NPF includes a Chapter (No. 6) entitled ‘People, Homes and Communities’. It sets out that place is intrinsic to achieving good quality of life. Some key policy objectives, which are highly relevant to the subject proposal, are below:

National Planning Objective 13 provides that “in urban areas, planning and related standards, including in particular, height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.

¹ A full review of the relevant planning policy context for development was set out in detail in Planning Report to the application (prepared by Tom Phillips + Associates, dated 31st Jan 2020). We ask the Board to have regard to that report as we do not propose to recite it in detail in this Appeal Response.



These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected”.

*National Policy Objective 33 seeks to “prioritise the **provision of new homes** at locations that can support sustainable development and at an appropriate scale of provision relative to location”.*

*National Policy Objective 35 seeks “to increase residential density in settlements, through a range of measures including restrictions in vacancy, **re-use of existing buildings, infill development schemes, area or site-based regeneration** and increased building heights”.*

- The Draft Development Plan explicitly acknowledges that economic downturn of 2008 and the resultant collapse of the economy for a period extending beyond 6 years had major implications for the Country. The construction industry, which had been experiencing unprecedented growth, suddenly experienced a dramatic contraction, a consequence of which was a collapse in the property market, “**evidenced in the almost complete stagnation in housing construction**”.
- This has resulted in a pressing need to increase the supply of residential accommodation. Having regard to this, it is submitted that the delivery of new and improved housing stock, together with an appropriate quantum of employment uses (as envisaged by the site’s EGZ zoning objective) and tourist accommodation use (which is considered to be the optimum use to revitalise, reuse and revive the existing Mill Building) is an appropriate development outcome for the site.
- In summary, the proposal would help to increase the supply of residential accommodation in a desirable neighbourhood, at a time of acute housing demand, whilst also consolidating development on a brownfield site. This represents an opportunity to achieve a more sustainable use of a centrally-located, highly accessible land within the inner suburbs, which is fully consistent with national planning policy. Importantly, it would also lead to the adaptive re-use of some of Drogheda’s most important historical buildings, thus celebrating their significant industrial heritage.
- Having regard to this, we request that the Planning Authority have regard to the recommended amendments to the *Draft Louth County Development Plan 2021-2027*, which are outlined in Section 6.0 below.



4.0 CURRENT DEVELOPMENT PLAN

Review of Land Use Zoning Objectives

The current, applicable Development Plan for the subject site is the 'Drogheda Borough Council Development Plan 2011-2017'.

The site is subject to 2 no. separate land use zonings – 'Employment Generating Zone - EGZ' and 'Open Space and Recreational Area (Public/Private) - OS' (See Zoning Map below.)

'Employment Generating Zone - EGZ': This zoning applies to the centre and southern area of the site. The objective of this land use zoning objective is: "to provide for the development of business and employment generating business activity which is primarily manufacturing service oriented and retail output is ancillary to primary use".

'Open Space and Recreational Area (Public/Private) - OS': This zoning applies to the north/northwest area of the site. The objective of this land use zoning is: "to provide for and/or improve open space and recreational amenities".

The area of land zoned as 'Open Space and Recreational Area (Public/Private) - OS' has limited development potential as only a small number of land uses are supported. The intention however is to develop the part of the site that is subject to the EGZ zoning, with only minor ancillary public realm improvements and car parking on the OS zoned land.

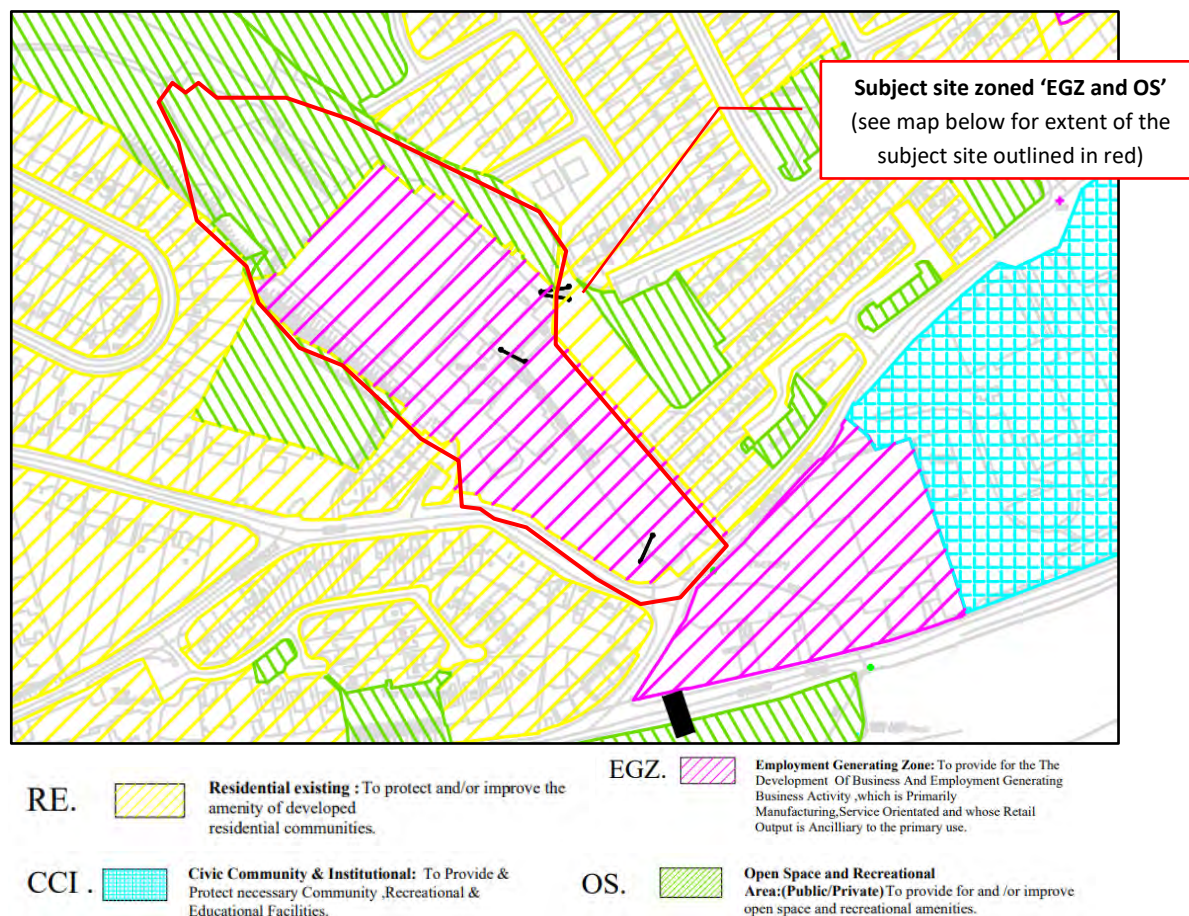


Figure 4.1: Zoning Controls and indicative location of the subject site (source: Drogheda Borough Council Development Plan 2011-2017).



Implications for developing the subject site

The current Development is very restrictive and not particularly facilitating uses other than those which are 'commercial / employment generating' uses.

It is envisaged that the future proposed development of the site may potentially comprise:

- Enterprise Centre / Commercial Land Uses;
- Hotel;
- Visitor Centre;
- Residential;
- Retail (small local shops only);
- Other ancillary uses, such as cafés, coffee shops, etc.

'Residential' and 'Hotel' are 'not permitted uses' under the current Development Plan.

(We note that 'Residential Ancillary' is listed as 'open for consideration', which means that such a use, by reason of its nature and scale, would not be in conflict with the primary zoning objective for the area.)



5.0 DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Louth County Council published the *Draft Louth County Development Plan 2021-2027* on Wednesday 14th October, 2020. It outlines a vision for the future growth of the County over the six-year period and beyond.

The proposed zoning for the front ('developable') part of the site is proposed to be '**E2 – Business and Technology**' under the Draft Plan, which is similar to the existing 'EGZ - Employment Generating Zone' zoning (which it is applied under the *Drogheda Borough Council Development Plan 2011-2017*).

The full list of uses for this zone are below:

Generally Permitted Use Digital Innovation Hub/Co-working Space, E- Charging Facility, High Technology Manufacturing, Industry Light, Offices, Research and Development, Science and Technology Based Enterprise, Telecommunications Structures, Utilities.
Open for Consideration Business Enterprise Centre Coffee Shop/Tea Room, Childcare Facility, Conference/Event Centre, Data Centres, Food Processing Facility, Hotel/Hostel/Aparthotel Residential , Training Centre.

Figure 5.1: Land Uses 'Generally Permitted' and 'Open for Consideration' (source: *Draft Louth County Development Plan 2021-2027*). The above red-lined uses are discussed in further detail in Section 6.1 below.

'Residential' is not listed as a 'Generally Permitted Use' or as an 'Open for Consideration' use, indicating it is not fully supported by the Draft Development Plan. 'Residential (Ancillary)' is an 'Open for Consideration' use, which is defined as "limited residential development ancillary to an existing or proposed business/industrial operation may be considered".

We submit that it would be preferable to have 'Residential Ancillary' as a "Open for Consideration' use, and without the caveat of it having to be "limited". The caveat that any proposed new residential development be required to be ancillary to an existing or proposed business or industrial operation should be retained however, to ensure the primacy of employment generating land uses are promoted for this zone.

We note that 'hotel' is listed as 'Open for Consideration'. In our view, this is positive and logical, and fully in accordance with the aspirations of the zoning, which is to deliver employment type land uses "in high quality campus style developments", which the provision of a hotel will help to achieve in this particular setting.

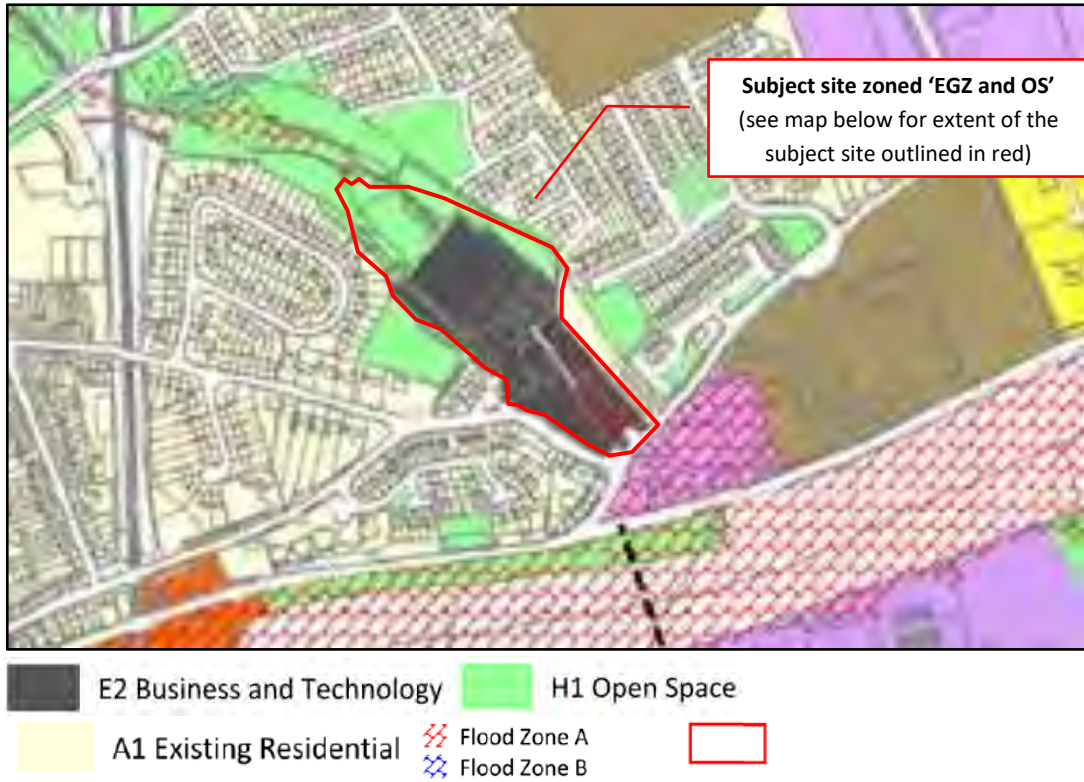


Figure 5.1: Zoning Controls and indicative location of the subject site (source: Draft Louth County Development Plan 2021-2027).



6.0 RECOMMENDED AMENDMENTS TO THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

In order to reflect the important development opportunity which is the subject site, the following recommendations are submitted for inclusion in the *Louth County Development Plan 2021 – 2027*:

It is recommended that:

1. The Subject Site should be identified as an ‘Opportunity Site’ in the Development Plan.

The *Draft Development Plan* notes that an important function of the Plan will be to instigate the regeneration of certain, important locations in the County. This is so that physical, economic and social regeneration can be promoted and that existing infrastructure can be capitalised upon. This is consistent with national planning policy and guidance, which is highlighted in Section 3.0 above.

We also note that following policy taken from the Draft Development Plan in this regard, which is highly applicable to the subject site:

*“Regeneration: Revitalising and redeveloping the town centre will be a priority. This includes the **regeneration of opportunity sites**. Integrated physical, economic and social regeneration will be promoted to capitalise on existing infrastructure.*

*Areas identified include the Heritage Quarter and the Westgate Area, which received funding under the Urban Regeneration Development Fund (URDF). Other opportunity sites include the Docklands. **This approach is supported by the RSES over and above the development of greenfield sites.***

[Source: Section 1.2.1 ‘Drogheda’ of the Draft Louth County Development Plan 2021 – 2027. Emphasis added by Tom Phillips + Associates.]

We submit that the Boyne Mill site is deserving of a special mention in the Development Plan as an ‘Opportunity Site’. An appropriate insertion should be made into Section 1.2.1 of the final Development Plan in order to recognise the strategic importance of these lands, and that it is a focus of the Planning Authority to see the site successfully developed in the short-term.

We respectfully request that the above paragraph is amended as follows (see red text):

*“Regeneration: Revitalising and redeveloping the town centre will be a priority. This includes the **regeneration of opportunity sites**. Integrated physical, economic and social regeneration will be promoted to capitalise on existing infrastructure.*

*Areas identified include the Heritage Quarter and the Westgate Area, which received funding under the Urban Regeneration Development Fund (URDF). Other opportunity sites include the Docklands **and the Boyne Mill site located on the Greenhills Road, Drogheda, which represents an excellent infill opportunity for a new, employment-led, mixed use development. This approach is supported by the RSES over and above the development of greenfield sites.**”*



2. The Subject Site should have a 'SO – Spot Objective'

The *Draft Development Plan* recognises a number of 'Spot Objectives' for specific sites in the County, including three in Dundalk, two at Ardee and one in Drogheda (see Table 13.2 below). The objectives are varied and range from the provision of public open space, preservation of ecological character and biodiversity, and provision of a retirement village.

Table 13.2: Spot Objectives

Spot Objective Number	Location	Objective
1	Dundalk	To preserve the ecological character and biodiversity value of the Nature Conservation Area.
2	Dundalk	To preserve the ecological value and character of the lands and to provide appropriate recreational and amenity facilities.
3	Dundalk	To provide for the development of a retirement village.
4	Ardee	To provide a public park with a minimum area of 12 acres (4.9 hectares) as part of a residential development.
5	Ardee	To provide for the development of housing for older people, specifically designed for flexibility and adaptability to accommodate the physical and cognitive needs of residents as they develop over time.
6	Drogheda	To provide a minimum of 40% of public open space as part of any residential development on these lands.

Given the specific nature of the subject site and its defined site boundaries, it would be beneficial in our view to ascribe an 'SO – Spot Objective' to these lands, which support a future mixed use development.

We acknowledge the site's zoning, which is 'E2 – Business and Technology', where employment generating uses are promoted. Therefore, a reference could be made to the *preferred uses on site*, i.e. "*office, research and development and high technology/high technology manufacturing type employment*", but that other, complementary uses should be facilitated on the site as part of a larger campus style development proposal.

We respectfully request that the following is added to Table 13.2 'Spot Objectives' under Section 13.6 of the final Development Plan, and that the zoning map is amended to include a new 'Number 7' Spot Objective.

Spot Objective Number	Location	Objective
7	Drogheda	To provide a new mixed use development which will reinvigorate this underutilised site and deliver significant physical, economic, social and conservation benefits.



3. 'Residential Ancillary'

The subject site is zoned 'E2 – Business and Technology' where Residential' is not listed as a 'Generally Permitted Use' or as an 'Open for Consideration' use. 'Residential (Ancillary)' is, however, an 'Open for Consideration' use, which is defined as "**limited** residential development ancillary to an existing or proposed business/industrial operation may be considered".

In our view, the reference to 'limited' is unnecessarily restrictive and this word (i.e. 'limited') should be omitted. Any proposal for new residential housing could still be required however to be ancillary to an existing or proposed business/industrial operation, which is the preferred zoning vision for the site under E2.

We respectfully request that the description for 'Ancillary Residential' in Section 13.19.17 of the final Development Plan is amended to as follows:

"Residential (Ancillary) - Residential development ancillary to an existing or proposed business/industrial operation may be considered".

4. 'Business Enterprise Centre' and 'Hotel' Land Uses

In accordance with the E2 Zoning Objective's vision, which is to deliver employment and commercial focussed type land uses in a high quality campus style setting, **we submit that it would be appropriate to list 'Business Enterprise Centre' and 'Hotel' in the 'Generally Permitted Use' category.**

At present, each of these land uses are listed in the 'Open for Consideration' category.

5. 'Nursing Home' and 'Health Care Centre'

It is recommended 'Nursing Home' and 'Health Care Centre' be listed in the 'Open for Consideration' category for the E2 Zoning Objective.

The Draft Development Plan notes that in general, there is a presumption against the provision of Nursing Homes in the open countryside for reasons relating to unsustainability, poor accessibility, social exclusion and visual intrusion. We would agree with this position, and suggest that the same logic applies to Health Care Centres.

The option of locating a nursing home or health care centre, which would provide important aged-care and healthcare services to people in an existing urban area, or future-intended 'high quality campus style setting', would be a logical and positive planning outcome and should be supported by the final Development Plan. This is particularly the case where such land uses are proposed in tandem as part of a wider development proposal for a new, proposed commercial business operation.



7.0 CONCLUSION

The subject lands comprise an important, well-located and serviced land holding at a site that is known as the Boyne Mill, Drogheda, Co. Louth. Having regard to the suitability of the site for a new mixed-use development, the current overarching policy objectives contained in the Draft Development Plan do not currently reflect the strategic importance of the Boyne Mill site.

We submit that were more flexible and supportive planning policies and objectives included in the final version of the *Louth County Development Plan 2021-2027* that this would improve the likelihood of the site being redeveloped for the common good. This would result in the reuse and revitalisation of a number of historic buildings of significant conservation value, and ensure future appropriate uses will be able to be achieved.

Further policy support would contribute to enhanced permeability in this part of Drogheda by improving the walkability in this area of the town, and by opening it up as an area that people can easily and comfortably pass through. This would actively encourage sustainable transport initiatives, as it involves for the redevelopment of an existing brownfield site that is highly accessible to the public transport services on offer in the surrounding vicinity.

We hope that consideration will be afforded to additional, supporting policy to assist in the delivery of redeveloping the site, which give rise to tangible economic, physical, social and conservation benefits for the local area, and wider region.

We would be grateful to receive a formal acknowledgement of this submission in due course.

If any queries arise in relation to the above matters, please do not hesitate to contact the undersigned directly at this office.

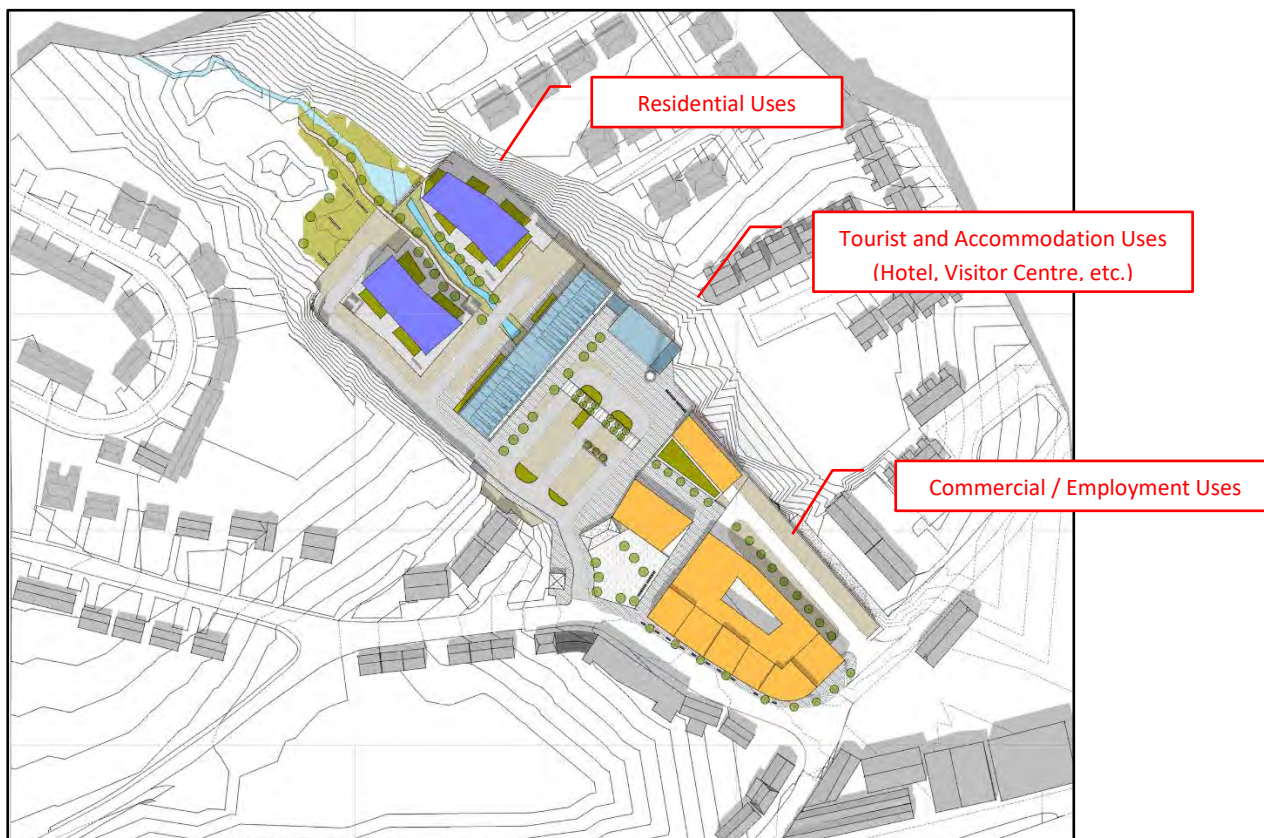


Appendix A:

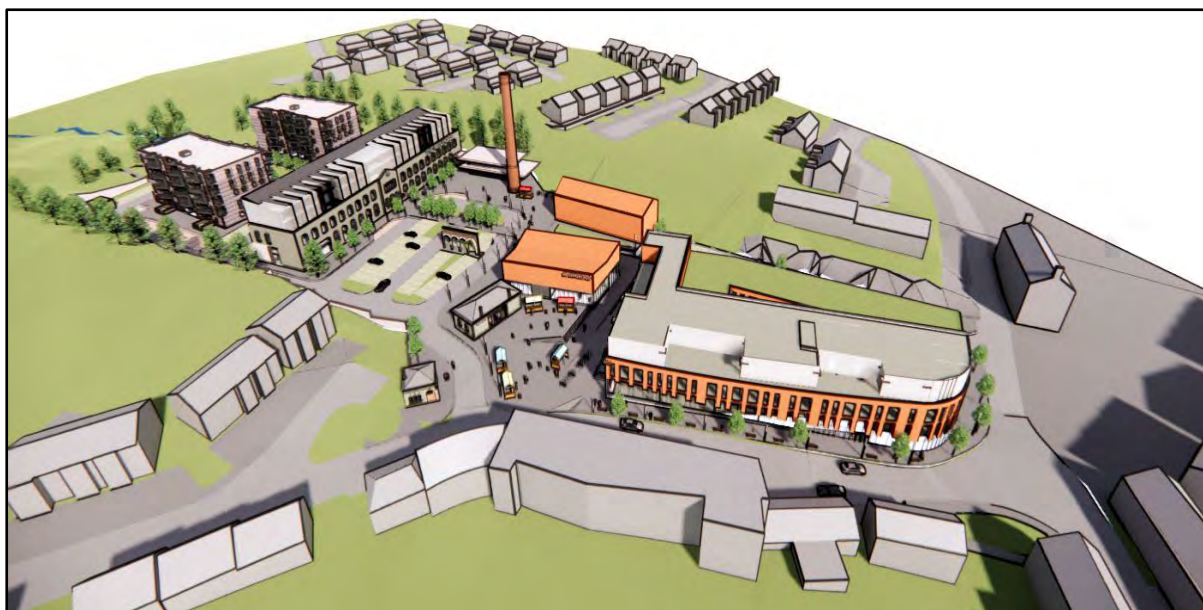
Images and illustrated diagrams taken from the '*Masterplan – The Boyne Mill Site, Drogheda, Co Louth (August 2020 – Revision 2)*', prepared by Oppermann Associates.



Indicative boundary of subject lands, outlined in red. (Source: Myplan.ie, annotated by TPA, 2020).



Proposed, Indicative Site Layout



New urban street edge with active street frontage on Greenhills Road with a strong urban corner at the junction with Newton Road. The new development should be open and provide a welcoming face to Greenhills Road. There should be a strong visual connection between all 5 protected structures on the site, achieved here through the new plazas/urban spaces.



The Development Proposal will help to maintaining the views of the Protected Structures on the site and provide spacious setback distance from such buildings.