

Draft Louth County Development Plan 2021- 2027 – Sienna Homes

Land to the North of Boyne
Road, Drogheda





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Prepared By: **MKO
Tuam Road
Galway
Ireland
H91 VW84**



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1. INTRODUCTION

This Development Plan Submission (DPS) has been prepared by MKO planning consultants in respect of land to the north of Boyne Road, Drogheda which is being promoted by our Client, Sionna Homes.

This Development Plan Submission fully supports the Local Authority’s proposal to zone the entire subject site for Residential development, and the Spot Objective to achieve 40% (minimum) open space on the site (Spot Objective 6).

The intention is to lodge a planning application in due course with the Planning Authority to develop the subject site in line with the emerging Development Plan. The further

1.1 Subject Site

The site in question is located to the north of the Boyne Road, south of L2307 Road on the east side of the town of Drogheda. The site in question extends to 3.7627 hectares. The site is located approximately 1.3km (as the crow flies) from Drogheda train station.



Plate 1: Site location (red star) east of Drogheda Town Centre (source: Bing Maps)

Within the extant Drogheda Borough Council Development Plan 2011-2017 the site is zoned for ‘RE’, residential existing and ‘OS’ open space and recreation – please refer to Plate 1 below. The zoning’s principle objectives are:

- RE – To protect and/or improve the amenity of developed residential communities
- OS - To provide for and/or improve open space and recreational amenities

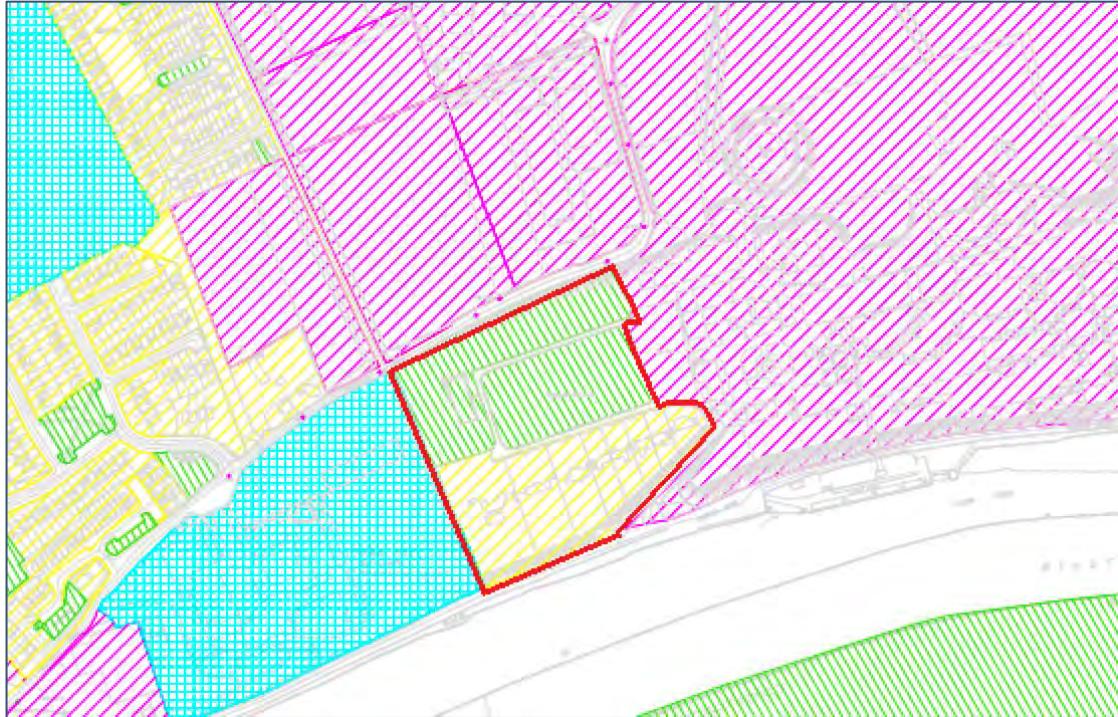


Plate 2: Site location and zoning

The site has been subject of a previous planning application (ref: 19/674) which sought planning permission for a residential development of 61 no. units (houses, apartments and duplex units) and associated works. The previous planning application focused in the main on the residentially zoned portion of the site to the south, while the access road and landscaping which ran north towards the L2307 road occupied the eastern portion of the zoned open space lands. The application did not include the central open space.

Through the request for Further Information (FI) issued in 2019, the Planning Authority sought to increase the number of units on the site; the applicant subsequently proposing a revision of both 106no.units and 99no. units. In reviewing the best means by which to ensure optimal use of the site, given its important location relative to the growing settlement of Drogheda, it was decided to withdraw that planning application (8th July 2020) and revisit the development proposal based on the entire site; that is, land currently zoned for residential and for open space/amenity purposes.

This process of revisiting the sites development potential has coincided with the release of the draft Development Plan. The residential zoning and Spot Objective (SO 6) of the draft Development Plan for the site is therefore wholly supported.

1.2 Development Proposal

The development proposal extends to the entire site (that is, the current residentially and open space zoned lands) of approximately 3.76 hectares allowing for a holistic design approach to be taken. The applicant has secured a new project team to progress this new proposal, and significant engagement with the Planning Authority has already taken place to inform the design evolution process. The team are fully aware of the Planning Authority's intention to secure meaningful open space as part of any development on this site.

The increased site area allows for a stronger design response to be arrived at, considering the character and constraints of the site and the aspirations of the Council. It is held that this site can contribute significantly to the delivery of housing in the Drogheda area and accords with the thrust of the Regional

Spatial and Economic Strategy ('RSES'). The site is expected to yield in the region of 190no. residential units along with the provision of upwards of 40% open space and a range of community/public facilities.

It is considered that the site therefore presents a significant opportunity to Louth County Council to meet its commitment to provide for residential development and for associated support development, which will contribute to sustainable residential neighbourhoods. Drogheda is a popular choice for homeowners and has an enhanced residential function as a commuter town for the Greater Dublin Area. It is also considered that the significant population targets outlined in the National Planning Framework and Regional Spatial and Economic Strategy ('RSES') will necessitate the future planned sustainable growth of towns. Indeed, the RSES targets Drogheda to reach a population in the region of 50,000 by 2031. Furthermore the RSES seeks to strengthen the role of Drogheda as an economic driver and acknowledges its capacity to grow in a self-sustaining manner and is a defined Regional Growth Centre.

At present the site is not used as an amenity space but has significant potential as such and this is recognised by the project team and applicant. The proposal will make efficient use of the site – in line with the thrust of national and regional policy – while achieving optimal amenity uses for all.

In aligning with the emerging Plan for the area, a driving aim has been the appropriate integration of residential and amenity uses. As such the evolving design proposals have regard to the parkland environment and seeks to retain mature trees where appropriate. In aligning with the thrust of emerging Plan policy, the residential element will complement the amenity offering by integrating pedestrian and cyclist access through the new residential area, attracting the wider public, offering a more formalised, accessible, secure, and attractive setting. It is considered that this approach is wholly conducive to sustainable urban place making.

2.

DRAFT DEVELOPMENT PLAN

2.1

National and Regional Context

It is important to consider the contents of the draft Development Plan in the context of the overarching planning policy framework in place, notably the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). At the present time there is a particular focus on the need to address the housing crises and develop Drogheda as a regional driver for growth. Indeed, at Regional level the aim is for Drogheda to reach a target population in the region of 50,000 by 2031. In that vein requests to date from the Planning Authority have been to increase the number of potential units from the site (originally 61 No. units) and enlarge the overall site to take a more holistic approach to its development, allowing for a higher unit yield across the wider site while achieving a high proportion of public amenity space. Such a proposal is more in line with recent direction at national and regional policy levels. It is acknowledged that the emerging Draft Louth County Development Plan 2021-2027 seeks to achieve a far more efficient use of the site.

Both the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midland Region contain a number of directly relevant policy objectives that articulate delivering on a more balanced and compact urban growth programme. The proposed development will provide a new high-quality housing development, and which will be consistent with the policy and objectives of the National Planning Framework and Regional Spatial and Economic Strategy, in particular their emphasis on the consolidation and growth of key towns.

National Strategic Outcome 1 (NSO 1) in the National Planning Framework (NPF) sets out a clear objective on compact growth targeting a greater proportion of future housing development to be within and close to the existing 'footprint' of built-up areas.

National Policy Objective 3a, 3b and 3c of the NPF sets out the urban development targets for the delivery of new homes within the footprint of existing settlements;

- National Policy Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- National Policy Objective 3b: Deliver at least (50%) of all new homes that are targets in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.
- National Policy Objective 3c: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.

The NPF notes that in capitalizing and building on the economic potential of the Dublin to Belfast economic corridor, there will be *“a focus on developing the corridor as a distinct spatial area with international visibility by: [inter alia]*

- *Effectively planning and developing large centres of population and employment along the main economic corridor, including in particular Drogheda and Dundalk;”*

The importance of the settlement of Drogheda in supporting the objectives of the NPF is cemented through National Policy Objective 44 which 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.”

The RSES directs the policy response at a regional scale on how best to achieve the shared goals set out in the National Strategic Outcomes (NSOs) of the NPF. Drogheda is included as Regional Centre in the RSES. To achieve the growth of the economic corridor, the RSES calls for compact and focussed growth in Drogheda (and Dundalk) *“to grow to city scale”*. As a Regional Centre Drogheda is considered as ‘critical’ to the development of the region as set out in the NPF. RPO 6.3 supports development in Drogheda to support this economic corridor.

Compact growth in this Regional Centre is a key priority for the RSES. A Joint Urban Area Plan (UAP) prepared by Louth and Meath County Councils will provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas to achieve the NPFs requirements of 30% compact growth. (RPO 4.11)

Regional Strategy Objective 1 of the RSES, Sustainable Settlement Patters, 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.”*

The important role of Drogheda in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to is therefore clear. The proposed rezoning will assist in the delivery of compact growth, whilst also prioritising residential and public amenity spaces.

2.2

Strategic Vision

The strategic vision of the draft Development Plan is to:

“Promote County Louth, in particularly the Regional Growth Centres of Drogheda and Dundalk, as uniquely attractive places in which to live, work, visit, and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are to the highest standards.”

This vision is wholly supported, as are the Strategic Objectives listed.

Core and Settlement Strategy

Chapter 2 of the draft Development Plan contains the core and settlement strategy for the Plan area. The draft Plan rightly considers the direction and spirit of national and regional policy frameworks in the hierarchy. As identified in the National Planning Framework (NPF), there is a drive to building centres of scale outside of the Dublin and the Drogheda-Dundalk-Newry settlement network has been highlighted as one such network which, in the context of the economic corridor of Dublin – Belfast, is a significantly important area of growth. To aid this growth the draft Plan, in line with the NPF, seeks to secure the re-use of brownfield and compact, sustainable growth. In that vein Policy Objective CS1 and CS2 are supported.

Drogheda has been designated as a Regional Growth Centre (RGC) in the RSES whereby significant population and economic growth is proposed, with such Centres to act as economic drivers for the region. The Drogheda RGC has a target population of 50,000 by 2031. Louth is the county with the highest percentage of an urban population outside of Dublin. The population of Louth increased between 2011-2016 with the highest increase occurring in the RGC's of Drogheda and Dundalk. The growth strategy and focus on the RGC's is supported (Policy Objective CS6).

The draft Plan projects a housing requirement of 8,278 units over the 6-year Plan period, which equates to an output of 1,380 units per annum. The RGC of Drogheda is expected to, in addition to that of Dundalk, meet a significant proportion of this requirement. It is held that the subject site, being utilised to its maximum potential, will directly contribute to this requirement and create a sustainable, vibrant, integrated community in this location east of the town centre. This approach will accord with the provisions of Policy Objective CS3 and CS4.

The preparation of an Urban Area Plan/Local Area Plan for the Drogheda area is a requirement of the RSES and this is supported. It is held that this will further enhance Drogheda's regional role.

While the growth strategy of the draft Plan acknowledges the potential level of brownfield development, as supported at national and regional level, it is clear that for Drogheda to achieve its regional role and meet projected population trends, other lands in close proximity to the town, existing services, facilities and infrastructure such as the subject site will be required. Efficient use of land via increased building heights is supported through Policy Objective SS5 of the draft Plan "*at appropriate locations in Drogheda*". It is considered that the subject site, making best use of the topography of the site and its views across the Boyne River will accord with the provisions of SS4 in this regard.

Policy Objective SS18 seeks to develop "*a network of green areas throughout the town*" and includes a greenway on the northern and southern banks of the River Boyne. The proposed site set back from the Boyne will include through Spot Objective 6 a significant amount of open spaces working with the sites existing character which will directly contribute to this Policy Objective.

Housing

Following on from the projected housing requirements in Chapter 2 of the draft Development Plan, Chapter 3 of the draft Development Plan focuses on "*creating places where people want to live and delivering well designed and located housing that is adaptable and resilient to the impacts of climate change and capable of meeting the current and future housing needs of the county.*"

With regards the current scenario, the draft Plan references the impacts of Covid-19 on the housing and other sectors of the economy. The draft Plan recognises the impacts may include a decrease in the number of residential units completed in the county, however the role of Drogheda as a Regional Growth Centre (RGC) and its importance in terms of the wider Dublin area cannot be underestimated.

The draft Plan recognises that since 2015 there has been a steady increase in the level of housing supply in Louth and that Drogheda is a growth area in this regard. The Housing Strategy of the draft Plan has determined that 2,260 households will not qualify for a mortgage and the same again will not qualify for affordable criteria for private rental during the Plan period. There will be a requirement for 29.4% social and affordable housing over the Plan period.

In that regard Policy Objective HOU 1 to secure the implementation of the Housing Strategy is supported. Policy Objective HOU 2, to support the delivery of social housing in Louth and Policy Objective HOU3 which specifies the 10% social housing requirement under Part V of the Planning and Development Act 2000 (as amended) is also supported. The subject site – zoned as A2 New Residential - is capable of delivering 192 no. units which will include the necessary minimum 10% affordable housing provision therefore directly contributing to the policy objectives of the emerging Plan.

The draft Plan seeks to create healthier, sustainable communities and neighbourhoods (Policy Objective HOU 10) and points towards achieve this by (inter alia):

- Connecting residential, employment, commercial and recreational areas with footpaths, cycle paths and public transport
- Promoting wellbeing and an active lifestyle
- Promoting social integration
- Creating safe, accessible neighbourhoods that encourage social interaction

The design of the subject site seeks to utilise the site to its fullest extent while also meeting the requirements of HOU 10 and the Spot Objective of the Plan. In that vein, the emerging design proposals for the site include a mix of 1, 2, 3 and 4 bed units are proposed across the site of both apartments (including duplexes) and houses.



Plate 3: Potential housing design



Plate 4: Potential apartment design

In arriving at a suitable density for a site the draft Plan encourages designers/developers to consider the surrounding context and how development will relate to the built form and character of its location. Density and more detailed matters of design are discussed below at Section 2.5.

The emerging design at the subject site seeks to achieve compact growth and higher densities as called for in the draft Plan achieving approximately 50 units per ha at present, however at its heart is a highly attractive and varied open space. This is further complimented by the proposed public uses such as café, gym and community space (e.g. meeting room). It is acknowledged that placemaking is a central consideration of the draft Development Plan (Section 3.13) with a view to ensuring quality design and layouts materialise across the Plan area. Policy Objective HOU 17 cements this as it aims to “*promote and facilitate the sustainable development of a high quality built environment where there is a distinctive sense of place in attractive streets, specs and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise.*” The Policy Objective stems from the Urban Design Manual criteria which have been carefully considered in the design process for the subject site. The five key areas discussed in the draft Plan and associated Policy Objectives HOU 18 – HOU 25 inclusive, will be considered as the final designs for the site evolve. It is noted that the draft Plan includes reference to dwelling mix and adaptable homes. In that regard Policy Objective HOU 26 is recognised and will underpin any development proposals for the site. In that vein it is considered the proposals for this site will meet the terms of the emerging Plan.

2.5 Environment

Chapter 11 of the draft Development Plan notes the “*underlying challenge to preserve, enhance and protect the quality of the environment whilst facilitating and encouraging development.*” In that vein Policy Objective ENV 1 is to “*implement European, National and Regional policy in relation to the protection of the environment, climate action and the pursuance of sustainable development principles in respect of the Council’s policies and procedures.*” This Policy Objective is supported.

It is acknowledged that the current site includes a degree of open space and trees which, together with the Spot Objective of the draft Development Plan, will ensure the environment and ecology of the site benefits future development. It is acknowledged that the existing trees and hedgerows on the site are an asset, in terms of both biodiversity, landscape setting and character and their retention where feasible will be prioritised. Policy Objectives ENV 37 and 38 which seeks to retain, protect and preserve existing trees and hedgerows are therefore supported.

It is acknowledged that the proximity of the site to the existing industrial processes requires to be considered in any design proposals for the site. In addition, it is noted that the site is within the zone of notification for the Flogas Ireland Limited Serveso site across the River Boyne and as such development proposals on the site will take account of Policy Objectives ENV 26 – ENV 28.

2.6 Development Management

Chapter 13 of the draft Development Plan sets out Louth County Council’s development management guidelines which will be applied by the Council in assessing development proposals. It is therefore critical that the guidelines are clear and fit for purpose. The recognition that *“the principles of sustainable design and the creation of healthy, attractive and sustainable communities are a cross cutting theme”* of the draft Plan is welcomed.

2.6.1 New Residential

The subject site is zoned New Residential Development (A2) in the draft Plan where the objective is:

“to provide for new residential neighbourhoods and supporting community facilities.”

This objective is wholly supported. In that vein the emerging designs for the site could include approximately 190 no. residential units along with a creche, public café, open space/play areas, community room and gym.

It is noted that the Plan goes on to list uses on A2 lands that are “Open for Consideration” and which includes:

- coffee shop/tea room, cultural facility, healthcare practitioner, restaurant, shop ≤200m², takeaway/fast food outlet, telecommunications structure, veterinary surgery

It is requested that coffee shop/tea room and restaurant are added to the list of Generally Permitted Uses on A2 lands. This will facilitate delivery of well-designed sites across the Plan area and specifically at the subject site which respond to a wider range of community needs and requirements. In creation of a successful place not only for residents but the wider existing community such facilities are considered positive additions to a site and help to bring people in to and move around the wider site.

2.6.2 Spot Objective 6

Table 13.2 of the draft Plan sets out the Spot Objectives. Spot Objective 6 relates to our Clients site and states:

“To provide a minimum of 40% of public open space as part of any residential development on these lands.”

This Spot Objective is acknowledged and accepted. It is considered that the quantum of open space required can be successfully delivered as part of the development proposals for the site and will have an overall positive impact on future residents of the site.



Plate 5: Potential café design

Chapter 13 of the draft Plan reinforces that if designed and located appropriately, open spaces “*can become an integral part of a development that promotes social interaction and physical activity, whilst also providing important links and connections within the development and to surrounding neighbourhoods.*”

The emerging design proposals seek to integrate the existing landscape features on site into the designs. A series of spaces are proposed along with community uses. Connections both north and south will move people through the site and activate the spaces created.

It is proposed to use the existing landscape to give context and setting to the proposed buildings and roads on site. In this regard it is acknowledged, as will be demonstrated through the design statement which accompanies the application, that smaller spaces can also create visual interest and be active spaces adjacent to and between buildings. This echoes the contents of Chapter 13 which acknowledges that “*open space can include passive areas of green space that consist of landscaped areas that soften the streetscape and more active areas where children can play and adults can walk.*”



Plate 6: Design intention for spaces between apartment blocks at upper access road

The sketch above illustrates how areas around apartment buildings could be fully designed and landscaped to be positive, pleasant spaces both for residents and users of the footpath and road adjacent.

2.6.3 Density and Plot Ratio

The draft Development Plan recommends (refer Table 13.3) a density per hectare of 35 units per hectare in Regional Growth Centre edge of settlement sites, and 50 units per hectare for town/village centre sites. The associated maximum plot ratio is set as 1 for edge of settlement and 2 for town/village centre sites.

It is considered that Table 13.3 of the draft Plan should be amended to include flexibility around both densities for Regional Growth Centres. As currently written the draft Plan is considered restrictive in respect of density and fails to adequately demonstrate compliance with the thrust of National and Regional policy framework. For instance, the National Planning Framework (NPF) includes the national policy objective of building strong regions and promotes accessible centres of scale – Drogheda is to play a key role in achieving this. Indeed, the NPF is clear that it is necessary to ensure the area “*the capacity to grow sustainably and secure investment as key centres on the Drogheda-Dundalk-Newry cross-border network*”. This is further emphasised at regional level whereby the Regional Spatial and Economic Strategy (RSES) calls for “*Drogheda to realise its potential to grow to city scale and secure investment to become a self-sustaining Regional Growth Centre...*” To achieve this, densities will have to be flexible in the emerging Plan. In recognising Drogheda’s role as stipulated at National and Regional levels of the planning policy hierarchy, the emerging Development Plan must be forward-reaching and ambitious. Efficient use of land and development of a product to meet predicted growth over the Plan period is absolutely fundamental not only to the residential market but to wider economic and employment opportunities in the Louth area.

To that end it is held that Table 13.3 should be re-titled, and the associated text of the Plan altered to provide density ranges and noted flexibility therein.

2.6.4 Layout

Chapter 13 of the draft Plan requires that “*The layout of residential developments shall consist of permeable, well connected streets and neighbourhoods where open spaces are functional, accessible, and centrally located and where walking and cycling are prioritised. When feasible, new developments are encouraged to include pedestrian and cycle links to adjacent residential areas/ commercial developments.*” The emerging design proposals for the subject site will deliver on this requirement and create a vibrant community on the site. Active building frontages to the street is also required, and as noted above can be delivered in tandem with open/amenity space. Reduction of speeds in new development through design is called for under the Development Management guidelines of the draft Plan. Any emerging design proposals for the subject site will ensure this is adhered to, creating safer routes for pedestrians and cyclists alike.

Height is also discussed in the draft Plan at Chapter 13 but also at Chapter 3. The relevant sections should be cross-referenced within the Plan for completeness. Acceptable building heights are deemed dependent on the location of the buildings, their ability to impact on overall legibility, to strengthen and promote a sense of place and quality design and to enhance existing streetscapes. Drogheda is a named location where increased building heights are supported in the draft Plan (Policy Objective HOU 16); this is supported. At the subject site varying building heights are proposed firstly to make use of the sites location, views and slope. In addition, the use of various carefully placed buildings of height allows for the site to work harder as a zoned residential development site in close proximity to the Regional Growth Centre.

3.

SUMMARY AND CONCLUSION

It is considered that the draft Development Plan has taken into consideration the requirements and direction at National and Policy level. It recognises the important role the Plan area plays and will continue to play as greater pressure is put on land, services and infrastructure.

The proposed zoning of our Client's land at Boyne Road as A2 New Residential Development along with Spot Objective 6 are welcomed. The site can be developed to contribute to the housing requirement in the Plan area while delivering a significant amount of public open space with varied uses for varied age groups.

In summary, the requested alterations to the draft Development Plan at this stage are as follows:

- Table 13.3 should be re-titled, and the associated text of the Plan altered to provide density ranges and noted flexibility therein.
- Height is also discussed in the draft Plan at Chapter 13 but also at Chapter 3. The relevant sections should be cross-referenced within the Plan for completeness.

It is respectfully requested the contents of this submission are taken on-board in the finalisation of the Development Plan. MKO on behalf of their Client Sionna Homes will continue to engage proactively in the Development Plan review process.

