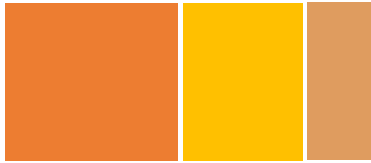


# **CWPA Planning & Architecture**



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## **Submission to the Draft Louth County Development Plan 2021 – 2027**

### **Proposed Rezoning on behalf of Monmore Development Ltd.**

**Site at The Ramparts, Rathmullen Road,  
Drogheda, Co. Louth**

## Introduction

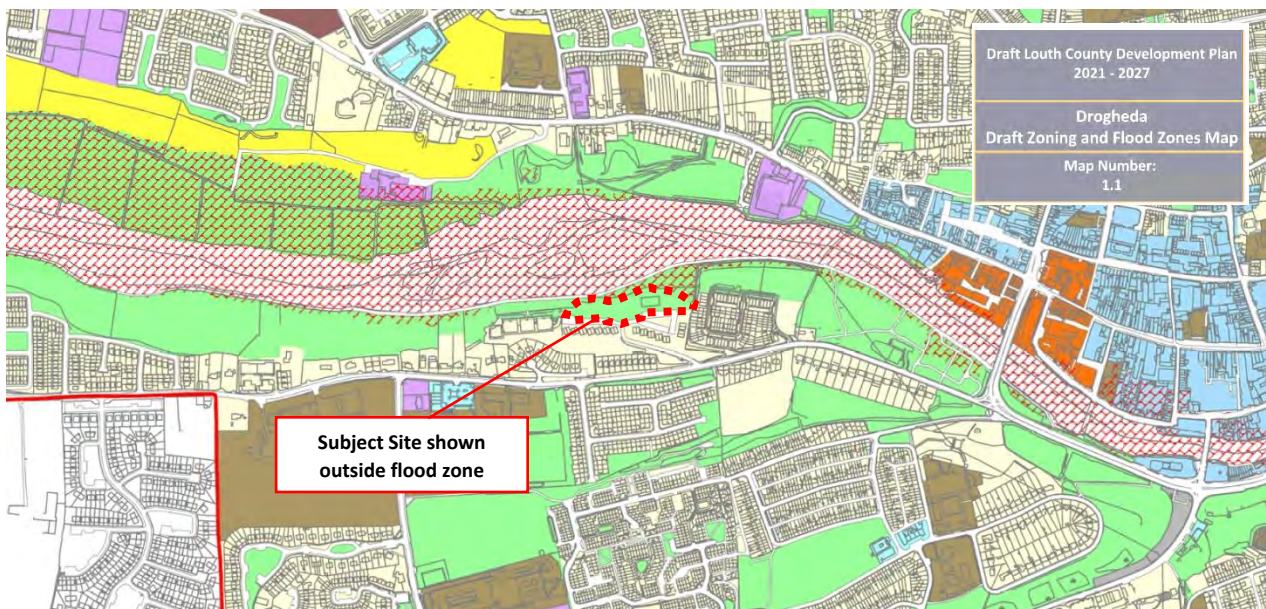
CWPA Planning & Architecture have been engaged by Monmore Developments Ltd. (Client) to set out a proposal for a rezoning at The Ramparts, Rathmullan Road, Drogheda, County Louth. We will demonstrate via this submission how the proposal will comply with National, Regional and Local planning policies. Also demonstrated in this document will be the planning gain that will be included as part of the proposal.

## Background

The Rathmullan area of Drogheda is primarily comprised of residential development. The area has the potential to deliver additional much needed residential development which would benefit not just the immediate Drogheda area but also the greater areas whereby an opportunity to live and work in Drogheda would be facilitated. Such a prospect is in line with all elements of Sustainable Development. This is a valuable opportunity for Louth County Council to provide much needed residential development in an existing residential area.

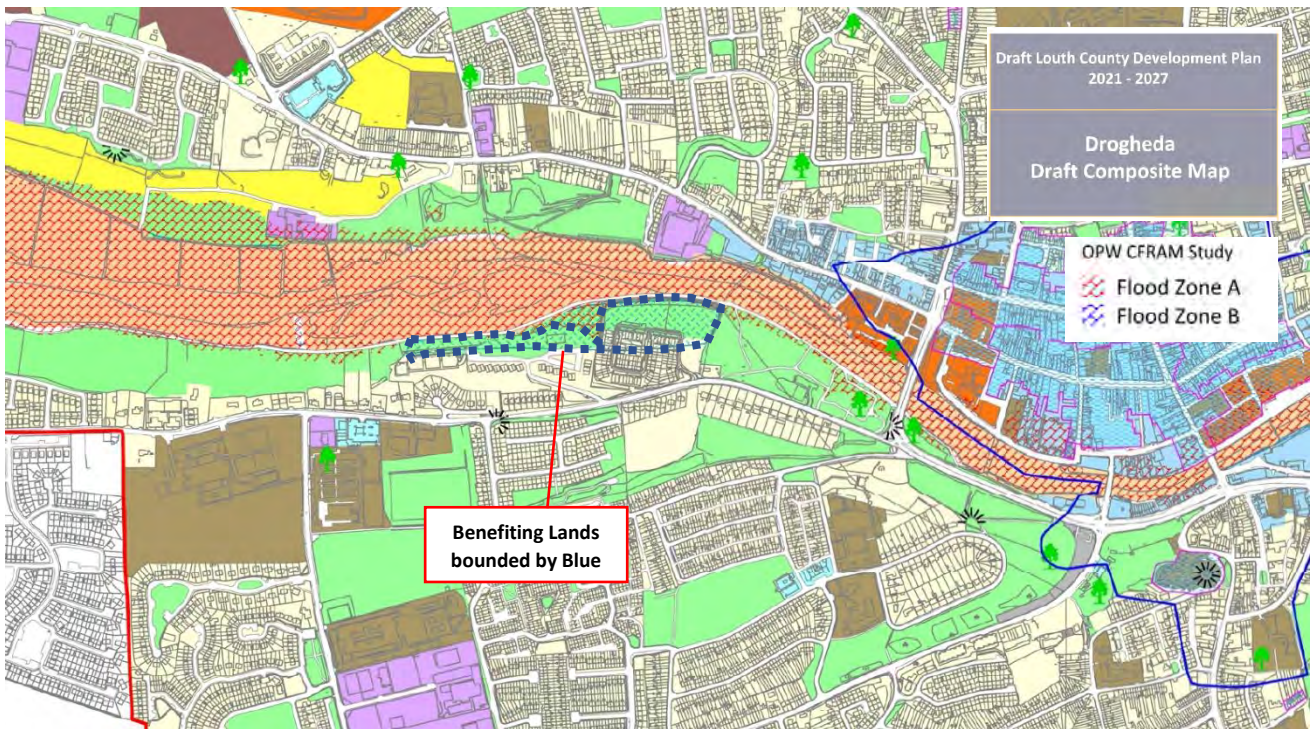
## Site Location & Environs

The site is located at Rathmullan at The Ramparts, which is off the Rathmullan Road. The subject site is designated as Benefiting Lands in the Draft Louth County Development Plan.<sup>1</sup> Benefiting Lands are described as follows, *Benefiting Lands: Lands benefiting from an Arterial Drainage Scheme.*<sup>2</sup>



<sup>1</sup> Drogheda Draft Composite Map

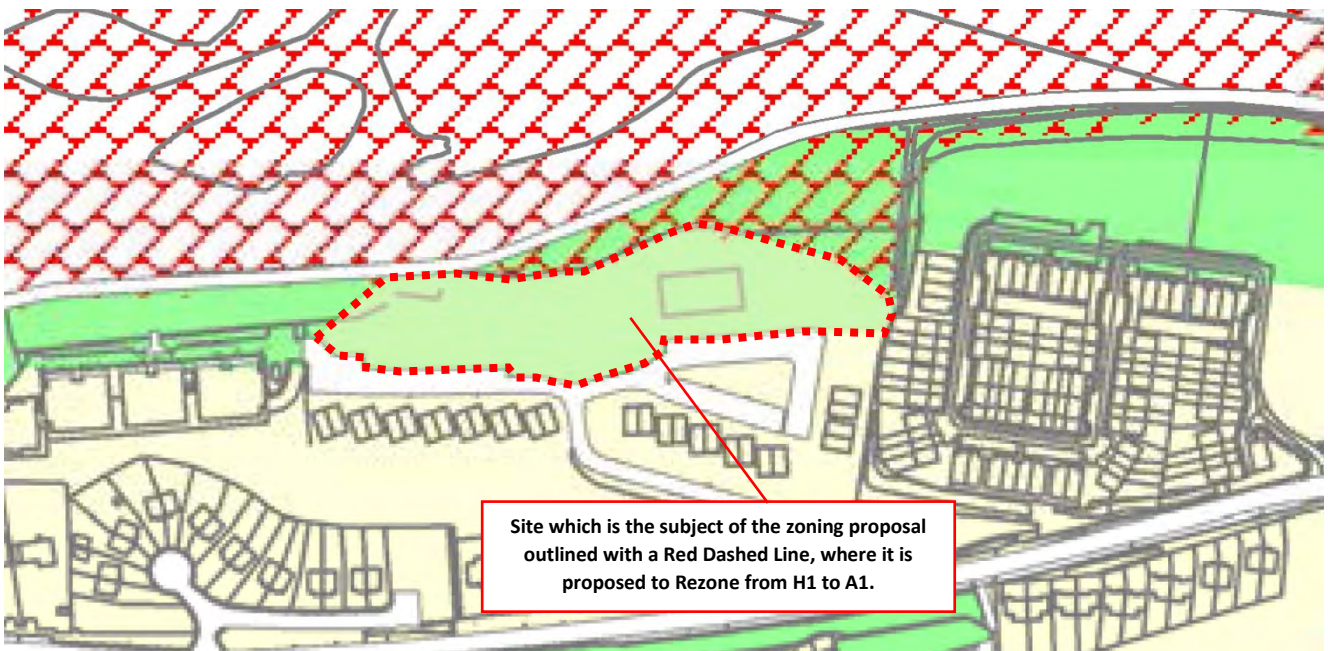
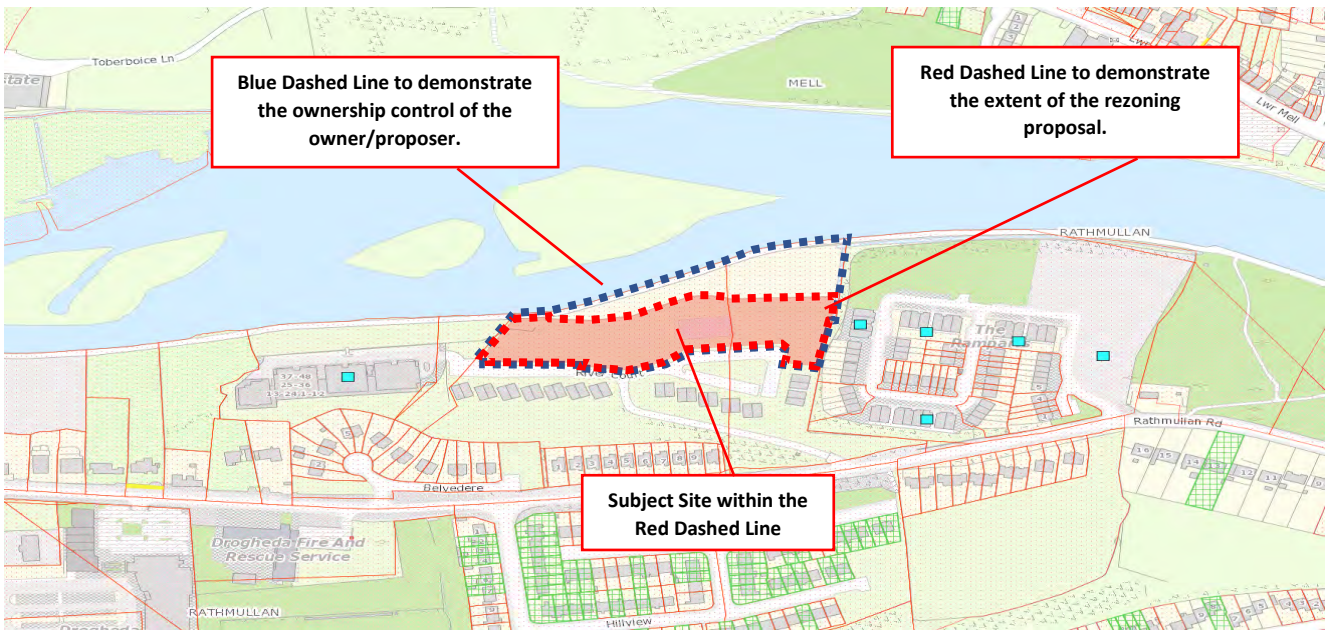
<sup>2</sup> <https://www.floodinfo.ie/glossary/> (accessed Friday, 18<sup>th</sup> December 2020)



## Development Proposal

The purpose of this submission is to seek a rezoning from H1 to a more appropriate residential zoning that would incorporate a mix of commercial, retail, and residential development. The concept is to bring much needed retail and commercial development to an existing residential area of Drogheda. The development would bring a more sustainable development to the area which currently is underprovided for in terms of commercial and retail development. To comply with various guidance regarding planning policy, the development would be compact with deference to its Boyne side location. It is envisaged that commercial/retail and parking elements will be at Ground floor level, with residential development in the form of apartments on the first, second and third floors.

It is proposed by our Client that a change of zoning be permitted on the subject site during the current Development Plan process being undertaken by Louth County Council. The proposal is to rezone the subject site from H1 Open Space to an appropriate zoning such as A1 to take cognisance of the infill nature of the site and the surrounding extant residential development. The A1 policy states: **Objective: To protect and enhance the amenity and character of existing residential communities.** There is currently no amenity value in the subject site and it offers no value other than wasteland, it should also be noted that the subject site is surrounded on three sides by residential development, it should be considered that the subject site is an underutilised site that would benefit the area by bringing in much needed affordable housing provision for prospective homeowners.



**Planning Gain**

Foul Drainage

There are currently challenges in the immediate area regarding foul drainage and the capacity of the existing pumping station to adequately provide for the existing volume of wastewater from the extant developments, such as The Ramparts, River Court, The Willows, Ramparts Green. The zoning of the subject site could be adopted with a specific objective included that would compel the developer to upgrade the existing pumping station to adequately address the volumes of foul drainage from the

existing developments and the proposed development. The new and upgraded pumping station would be maintained and operated by the Management of the new development to ensure the upkeep of the pumping station is certified, operated, and maintained by suitably qualified persons.

### Office Space

It is proposed that office space would be provided as part of the commercial development element. The Covid-19 Public Health Crisis has demonstrated a requirement for people to work in smaller office environments and even from home. However, this is not always possible for those with families or in apartments where space is inadequate regarding working space. For that reason, our client would propose to provide office space in a format that would adequately address the needs of those who must work remotely, or as incubator office units for small businesses wishing to lease office space on short-term leases. This could be coordinated with the Local Enterprise Office.

### Retail

There is an opportunity to bring a more sustainable development to the immediate area by providing a more convenient retail offering. There are retail developments already provided in Drogheda at a scale that provides for the Drogheda area and the surrounding environs. The retail offering at the subject site would be providing convenience shopping for the residents of the immediate area.

### Restaurant/Café

The riverside setting of the proposed development would lend itself to a provision of quality restaurants and café outlets that are commonplace in cities such as Dublin, Cork and Galway, not to mention in other European cities. Indeed, there is a riverside restaurant provision on the north quays side of the Boyne River, which demonstrates the concept of high quality of riverside restaurants bringing a vibrancy to these locations.

## **National & Regional Context**

### National Planning Framework/Ireland 2040

*The purpose of the National Planning Framework is to enable all parts of Ireland, whether rural or urban, to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role.*

*Furthermore, our close relationship with Northern Ireland must be taken into account by recognising the key links between Letterkenny and Derry, and Drogheda-Dundalk-Newry. 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. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.*<sup>3</sup>

*It is also the case that there are significant crossborder interactions focused on key settlement networks, specifically Letterkenny-Derry in the context of the North-West Growth Partnership and Drogheda-Dundalk-Newry in the context of the Dublin-Belfast economic corridor. The growth potential associated with these interrelated networks is also important for regional development.*<sup>4</sup>

### **Compact Growth**<sup>5</sup>

- *Targeting a greater proportion (40%) of future housing development to be within and close to the existing ‘footprint’ of built-up areas.*
- *Making 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.*
- *Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency.*

### **Louth/North-East**<sup>6</sup>

*While County Louth is located in the Eastern and Midland Regional Assembly area, the North-East is a functional area that comprises part of two Regional Assembly areas that also includes most of County Cavan and County Monaghan in the Northern and Western Region. The key driver for this regional area is the Dublin-Belfast cross-border network, focused on Drogheda, Dundalk and Newry.*

*The significant influence of Dublin and the crossborder network extends to the county towns and other settlements within the north-eastern regional area as well as to Fingal and parts of County Meath. In identifying opportunities for leveraged employment and sustainable population growth, development must be supported by enhanced connectivity, quality of life, strengthened urban cores and more*

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<sup>3</sup> Ireland 2040, Chapter 1.2 Making the Vision a Reality, pg 11.

<sup>4</sup> Ireland 2040, Chapter 2.1 Realising Ambition and Potential, pg 21

<sup>5</sup> Ireland 2040, Chapter 2.2 Overview of the NPF Strategy, pg 22

<sup>6</sup> Ireland 2040, Chapter 3.2 Eastern and Midland Region, pg 34

*compact housing in urban settlements. This is to protect and manage the strategic capacity of transport infrastructure and to ensure that the distinctiveness of settlements and rural areas is maintained.*

*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.*

### ***Ireland's Towns<sup>7</sup>***

*There is scope for potential growth in all towns in Ireland. In the context of the National Planning Framework, this will largely be determined by the relevant Regional Spatial and Economic Strategy for each Regional Assembly area, also taking into consideration the potential of smaller settlements and rural areas.*

*National Policy Objectives 2b and 7 recognise the key regional roles of Athlone in the Midlands, Sligo in the North-West, and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks and will inform the relevant Regional Spatial and Economic Strategies. The extent to which these towns should target future growth will be determined at regional level in the context of this Framework.*

*While targeted growth in the regional centres and network towns will take the lead in a regional and in the case of Athlone, inter-regional context, this must also be balanced with that targeted elsewhere. In all cases, regional and local planning authorities must consider the varied growth potential of different types of settlement in accordance with National Policy Objective 7, as well as rural areas, and tailor a strategy to balance this accordingly. It is not expected that all towns, large or small, will each target the same level of growth to 2040 and targets set in accordance with the Framework and the Regional Spatial and Economic Strategies will be reviewed based on performance, by 2027. But all towns can and must grow over this period and some will be identified as having capacity for higher than average levels of growth.*

*In each Regional Assembly area, where it is proposed to target significant growth, i.e. at a rate of 30% or more above 2016 population levels to 2040, in any settlement not identified in Policy 2a or Policy 2b of this Framework, for example where there will be major employment or infrastructure investment,*

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<sup>7</sup> Ireland 2040, Chapter 4.3 Planning for Ireland's Urban Growth, pg 62

*this will be on an agreed basis, aligned with investment in infrastructure and/or the provision of employment, together with supporting amenities and services:*

**National Policy Objective 2b**

*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.*

**National Policy Objective 7**

*Apply 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;*

Regional Spatial and Economic Strategy

The Regional Spatial and Regional Strategy (RSES) for the East and Midland Region includes sets out the Regional context for spatial planning regarding Drogheda. There are number of policies contained in the RSES that determine the future expansion of Drogheda as a Regional Town and an emerging City.

**Growth Enablers for the Core Region include;**  
 Drogheda to 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.

<b>Table 4.2 Settlement Hierarchy</b>				
Settlement Typology	Description	Areas		
		Metropolitan	Core Region	Gateway Region
<b>Regional Growth Centres</b>	Regional Growth Centres are 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.		Drogheda	Athlone Dundalk

Contained within the RSES in **Chapter 4.5 Regional Growth Centres** is a segment on the strategic significance of Drogheda. It informs that Drogheda is the fastest growing town in the country according to the most recent Census figures. The significant growth potential of Drogheda is set out due to its location within the Dublin – Belfast Economic Corridor. A main key priority is to continue to grow Drogheda in a sustainable way promoting compact growth to reach a population of 50,000 by 2031. This demonstrates Drogheda’s position as a regional driver and an emerging city within in the Eastern Region. The Chapter states, *“The objective 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.”* An additional key factor in the sustaining the success of Drogheda as a regional growth centre is targeting compact growth by identifying underutilised sites for regeneration in central locations of the town. A significant objective is to reverse commuter travel by promoting businesses within the town, providing employment opportunities for the existing population, which will also combat social inclusion.

**REGIONAL POLICY OBJECTIVES:**

**Drogheda Regional Growth Centre**

**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 4.15:** Promote Drogheda as an urban tourism destination while protecting its natural and built heritage resources with a particular focus on capitalising on the following assets:

- The town’s role as a gateway to the Boyne Valley heritage sites and World Heritage site at Brú Na Bóinne
- Amenity potential of the River Boyne including the Boyne Greenway
- Fáilte Ireland’s Ancient East designation.

**RPO 4.12:** Support the role of Drogheda Docklands and Port in particular by:

- Supporting and protecting the role of Drogheda Port as a port of regional significance
- Facilitate relocation of Drogheda Port subject to a feasibility study and appropriate coastal zone management.
- Supporting the future development of the Port Access Northern Cross Route (PANCR).

**RPO 4.16:** Support social inclusion measures including the revitalisation of areas by physical regeneration, planning, investment and community development and measures to improve educational attainment levels, up skilling in key competencies and skills acquisition.

**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 4.17:** Support the proposed Drogheda Flood Relief Scheme, subject to the outcome of the planning process and appropriate environmental assessment.

**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.

**4.5 Regional Growth Centres**



Figure 4.3 Regional Growth Centres

## **Draft Louth County Development Plan 2021 – 2027**

Drogheda has been identified as a driver of regional growth in both national and regional policy. The Draft Louth County Development Plan (Draft Plan) acknowledges and supports that designation. It is clear the Draft Plan has been prepared with diligence and regard for the planning hierarchy, which is demonstrated in the Draft Plan Core Strategy. There is a Strategic Vision contained within the Draft Plan that sets out a robust policy position regarding Drogheda which states the following: *“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 demonstrates the cognisance taken of the three pillars of sustainable development, they being Environmental, Social and Economic.

In Chapter 1.6.1 *STRATEGIC OBJECTIVES* there are relevant policy objectives proposed that will address the needs of Drogheda as a regional economic driver and an emerging city. Primarily the two strategic policy objectives are **SO1** and **SO 2**. Strategic Objective SO 1 states the following: ***Realise the potential and promote the development and growth of County Louth through harnessing the economic and employment potential of the competitive advantages of the County. This includes its strategic location, connectivity and accessibility to external markets and having regard in particular to the role of Drogheda and Dundalk as Regional Growth Centres located on the Dublin-Belfast Economic Corridor.*** Strategic Objective SO 2 states the following: ***Support and promote the role of Drogheda and Dundalk as key designated Regional Growth Centres with high levels of self-sustaining employment and services, to act as regional economic drivers, playing a significant role for a wide catchment area and to help achieve a more coordinated and sustainable settlement and travel pattern across the region.***

## **Conclusion**

This submission sets out the supporting argument for the site that is the subject of this proposal for rezoning from H1 to A1, or another appropriate residential zoning that would facilitate the development of affordable homes for the existing population of Drogheda and for those working within the Drogheda area who wish to relocate to the area in which they work.

The status of the site as it currently stands is an underutilised waste ground that is located between the river walkway and marshland of the river Boyne. The amenity value of the site in its current format is very low and due to the fact the land is privately owned, it is not accessible to the general public.

The major planning gain for the area is that the current pumping station serving the Immediate area is under considerable pressure and may not be fit for purpose for the volumes of wastewater generated by the existing developments. This is primarily due to the absence of a holding tank that was not installed in line with a previous grant of planning permission. However, this proposal is an opportunity to resolve that matter and remove any issues regarding public health due to wastewater disposal into the public network.

Due to the subject site designated as Benefiting Lands following the considerable works carried out to enhance flood prevention, the site could be planned and developed in a way that would ensure no residential development would be allowed on the ground level of the development. The development at grade would more appropriately be suited to car parking or commercial/retail development.

The site as set out in its location could be deemed infill as it is surrounded on three sides by residential development. The use of such an underutilised, vacant site would benefit the area as it would eliminate waste ground and promote a higher amenity value regarding the river Boyne and the river walkway by improving access to the walkway via the development.