

RE: DRAFT LOUTH COUNTY DEVELOPMENT PLAN

**Submission by Drogheda City Status Group (DCSG) on the
Draft Louth County Development Plan 2021-2027**

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Background

Who we are

Drogheda City Status Group (DCSG) was established in November 2009, following a general discussion regarding the downgrading and neglect of Drogheda and its environs over the past number of years. A group of local (volunteer) people set up the Drogheda City Status Group, the Mission Statement being:

"To procure City Status for Drogheda to enable its unique history, location and potential to be appreciated and promoted in industry, business, tourism, education, health and quality of life to the benefit and advantage of its citizens and those of the South Louth and East Meath Region."

Since inception, Drogheda has grown substantially, but national and local Government has not kept pace with the challenges, opportunities and needs of an emerging city, including the matter of Drogheda being two riverside towns rather than one unified city for the betterment of all citizens in the catchment; the more efficient and effective delivery of State and other services to all; and the need to present one unified Regional Growth Centre (RGC) to both overseas and domestic potential employers to address several of the issues below.

Introduction

Drogheda is the largest and fastest growing town in Ireland (Census 2016) In addition, Drogheda was **identified as one of Europe's top ten emerging "micro-cities"** along with Galway, Waterford, Limerick and Shannon in a report in the Financial **Times's** 2018/19 FDI Magazine. Apart from population growth to date, it is notable that Housing Completions in the Greater Drogheda area in Q2, 2020 were the largest outside Dublin, confirming ongoing, rapid population growth in the future with the need for matching employment growth in the immediate area.

Given this challenge and Drogheda's recent designation as a RGC, the creation of significant local employment must be an urgent priority, supported by a local **presence on the part of the State's job** creation agencies, including IDA, Enterprise Ireland and LEO, and the establishment of a forum that is tasked with developing **"An Action Plan for Local Jobs in Greater Drogheda," to include a strong focus in** achieving a reverse commute effect, with more local people working close to home and more people commuting into Drogheda for employment. Recent research (in early 2020) undertaken by The Mill Enterprise Centre; Drogheda Chamber and the Love Drogheda BID confirmed the significant challenge posed by the extent of commuting from the Greater Drogheda area.

Coupled with this Louth County Council (LCC) must collaborate with Meath County Council (MCC) and relevant State agencies to address current anomalies – for example, Greater Drogheda is served by TWO IDA Regional Offices, yet Ireland's largest town and has no full time staff member of the three job creation agencies **above based locally. A "Strategic Objective" (SO) for inclusion** in the plan to address this – and related matters – is proposed below.

Given the right supports at national, regional, county and local level, Drogheda has the potential to **become Ireland's next** city in less than a decade, overtaking **Waterford as Ireland's fifth largest city and urban centre** and a major centre of economic activity. This is acknowledged in the Louth Draft CDP that cites 'The Self Sustaining Growth Towns of Drogheda and Dundalk as Regional Growth Centres,reaching their full potential as cities of scale and economic drivers in the Region.'**(Chapter 2.5.4)**. This status is also endorsed in the NDP and EMRA RSES Plans.

Drogheda is a designated self-sustaining RGC in the Ireland 2040 plan. The town has a highly skilled, multi-cultural, growing and well educated young population, many of whom need to commute daily to work in Dublin and elsewhere. The focus now is to ensure that local enterprise and employment opportunities match a brave vision for the future, so that the people of Drogheda can work close to home in a smart, green, safe, healthy, sustainable community environment that offers security, inclusion, progression, prosperity and a healthy lifestyle for all our residents. Reversing the commute for thousands of skilled individuals by supporting indigenous job creation and via IDA opportunities to attract FDI, will provide sustainable growth

for Drogheda and environs and align it with the objectives of the NDP and RSES EMRA plans.

Drogheda is currently underperforming in terms of employment and will need to be positioned to attract significant FDI to progress and **to 'catch-up' with other towns in the county and elsewhere**. Jobs to workforce ratio for Drogheda currently stands at 76% compared with Dundalk at 100% and Dunleer at 140%.

There is currently a lack of serviced industry related sites available in Drogheda (suitable for early development by both FDI and indigeneous businesses) which needs to be addressed as a matter of extreme urgency, consistent with the ambition for Drogheda as set out in both the NDP and RSES. There are now two major RGCs in Co. Louth. The draft CDP should reflect and acknowledge the imperative of capitalising **on the opportunities presented by Drogheda's new-found status as a RGC** (first proposed in the Buchanan Report over fifty years ago). The Louth draft CDP does not reflect the opportunities this new status presents and so needs to be revised to do so.

As 'Gateways' Letterkenny; Sligo; Athlone and Dundalk have benefitted from State supports such as IoT's and a local presence on the part of IDA, LEO etc. Drogheda is the latest and largest RGC and as such is playing catch up with the others. Therefore, it needs the necessary supports consistent with its recent designation as an RGC.

Special effort and investment must be made in the case of Drogheda to create a **"level playing field" in order for it to succeed** to its full potential. A concerted effort is required on the part of LCC to guard against the emergence of a two speed local economy in the county where economic development delivers more employment than necessary in one part of the county whilst under delivering in another part. Thousands of residents in Drogheda, South Louth and adjoining East Meath are currently condemned to long, daily commutes to secure employment – principally in the Greater Dublin area; this situation needs to be urgently addressed and rectified for the betterment of local communities in those areas.

Whilst it is hoped the pandemic is of relatively short term duration, the continued growth and threat of Climate Change demands that jobs are located close to where people live. Whilst this policy is mentioned in the LCC CDP – in the case of Drogheda, there is no evidence of any intention to apply it.

Executive Summary

1. Section 2.12.1 and Section 2.13 of the Draft County Development Plan (CDP) for County Louth does not set out a clear Vision for Drogheda, **Co Louth's** largest town - also the largest town in Ireland and the next emerging city.
2. The Core Strategy and Housing Allocation seeks to unnecessarily limit the growth of Drogheda, contrary to the objectives of National and Regional Planning Policies.
3. Section 2.7 The County Plan should include implementation objectives relating to the Joint Unitary Urban Area Plan for Drogheda requesting that the East and Midlands Regional Assembly (EMRA) brings forward proposals and initiatives to ensure the timely preparation of a Joint Unitary Urban Area Plan (JUAP) for Drogheda. The Draft Plan does not do that. The RSES EMRA page 38 under Collaboration requires that 'More effective strategic planning and co-ordination of the future development nationally and regionally strategic locations that straddle inter- or intra-regional boundaries, for example Athlone, Carlow, Drogheda and Dundalk Newry, is required. The Regional Assembly will ensure that joint urban area plans are delivered for the Regional Growth Centres by the relevant local authorities to deliver regional centres of scale.'

The Draft CDP is missing a **critical Strategic Objective ("SO")** – i.e. setting out the urgency to work with Meath Co. Council on addressing all aspects of the future relationship between Drogheda and East Meath. The assistance of the EMRA should be sought to expedite this critical issue.

4. The Draft Plan fails to identify key deliverable employment sites for new FDI and indigenous industrial investment in Drogheda. All significant land banks zoned for employment use are already occupied, un-serviced (piped infrastructure) or rely on the delivery of the PANCR road. An RGC needs to **have in place Tier 1 sites per the NPF, i.e. "Ready to Go."**
5. There is no objective in the Draft CDP with regard to delivery of a second Rail station for Drogheda on the north side to support the delivery of housing and investment which would ease traffic crossing Drogheda from the northside to the existing railway station. A Drogheda North Railway Station will also attract new rail commuters from Drogheda North and adjacent areas such as Tullyallen, Termonfeckin, Clogherhead etc. It would also serve staff, visitors and out-patients attending the nearby Our Lady of Lourdes Hospital, as well as opening the prospect of a link for freight to Ireland's **busiest Regional Port** – Drogheda – just minutes away.

6. Chapter 6 Tourism - Tourism brings direct expenditure into towns, creates employment and is a direct driver of economic activity. Drogheda is a designated tourism destination town which is defined by Failte Ireland as *A town in which a visitor can spend an overnight, and in which a cluster of products, services, activities and experiences are offered. It incorporates various stakeholders and intangible elements, such as its character, image and identity, and can function as a touring base for visitors. Year-round destination towns, in particular, need to offer a selection of accommodation, and sufficient things to do and see for two days.*

Tourism can also assist in addressing a number of challenges faced by communities and planning authorities, including the loss of community, declining economies and under-used town fabric. The need to address the outcomes of these issues in Drogheda is clear and is currently being examined by the Department of Justice and Equality. However the Louth Draft CDP omits to give primacy to Drogheda as a Failte Ireland designated tourism destination town. Drogheda needs to be promoted as the **primary tourism destination in County Louth for the myriad offerings including it's proximity to Ireland's main Airport in Dublin, to the UNESCO World Heritage site at Bru na Boinne, it's obvious importance as the main heritage centre** being one of the oldest towns in Ireland and the home of many landmark sites including the oldest barbican gate in Europe as well as other adjacent world famous heritage including Monasterboice – another potential UNESCO **World Heritage site. In the past, Drogheda has been labelled "The Gateway to the Boyne Valley."** Today, it neither has a dedicated Tourism Officer or Heritage Officer for the Drogheda and the South County area.

Drogheda has an excellent volunteer run museum at Millmount which currently receives no funding from LCC. This needs to be addressed.

7. Chapter 2.13 refers to Drogheda as the location of the Regional hospital however there is no reference in Chapter 4 to **the importance of the hospital's status to the county and region and no provision to enhance or secure it's future** as such. This omission is all the more disturbing as OLOL Hospital is probably the largest employer in the county.
8. There is no reference in the Draft Plan to the delayed delivery of the LMETB Head Office in Drogheda as prescribed in the ETB Act 2013 which is a critical piece of infrastructure that is expected to deliver much needed jobs and economic activity for Drogheda.

9. As an identified RGC, **Drogheda is the only such identified Centre that doesn't have a Third Level education facility/campus within its boundaries or even within 25kms of its boundaries.**

10. In August 2019 the Minister of Justice and Equality Helen McEntee appointed Vivian Geiran Director of Probation Services to carry out a scoping exercise to gather and assess information relating to the ongoing challenges and needs experienced by communities in Drogheda, and identify opportunities to connect, support and strengthen services, including those for young people, in the area.

"Mr Geiran will look at the areas of community safety, policing, the impact of substance abuse, and drug-debt intimidation, but also at community development needs, the existing service landscape, including facilities for **families and children's services, the physical environment, and education and employment opportunities.**"

These are challenges that we can no longer ignore in Drogheda. We clearly urgently need dedicated commitment to Drogheda to provide all the requisite services and opportunities to address the needs of our communities to ensure that we can stop and reverse the damage that has been done to Drogheda **and its reputation. This requires substantial focus and real commitment to Drogheda and a dedicated LCC Senior Management team based in Drogheda to oversee and input into the council's management of Drogheda and environs as a necessary first step to addressing this deficit.**

At present all Senior LCC Executives are based in Dundalk. Of the total staff of 750, 493 are based in Dundalk (66%) – just 22% of other ranks are based in Drogheda. Given Dundalk is well advanced as an RGC, Drogheda now needs to be resourced, initially with a core Senior team led by the Deputy CEO, and supported by key **Planning; Heritage and Tourism officials to locally address Drogheda's strengths and weaknesses; opportunities and threats.** This will likely involve the reinstatement of some of **the Council's property at Fair Street** to include live on-line access to all meetings of the Council (not just in Drogheda) as exists already in other Local Authority areas.

Drogheda – a Regional Growth Centre

Drogheda is the largest town in Ireland, with a population of almost 41,000 in 2016. This figure grossly underestimates the full scale of the Greater Drogheda area which has a population of circa 80,000 (e.g. see “Southern Environs” and LBM below and accompanying map). Drogheda is strategically located on the Dublin-Belfast Economic Corridor. Its importance as a centre for population and economic growth is recognised in the designation of the settlement as a Regional Growth Centre in the National Planning Framework and the EMRA’s RSES Plan.

We believe that the growth of Drogheda should be promoted and encouraged, and we believe that National and Regional Planning Policies support that view:

- **Drogheda’s status as a RGC in the National Planning Framework – Ireland 2040,**
- **Drogheda’s strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry, as well as the M1 Corridor.**
- **Drogheda’s status as an RGC within the Regional Spatial & Economic Strategy for the Eastern and Midlands Region and its unique status as the only RGC within the hinterland area of the Greater Dublin Area.**
- The National Development Plan 2018 – 2027 includes plans for the DART Expansion program and the electrification of the rail network to Drogheda.
- **Drogheda’s strong town centre, its capacity in terms of services and infrastructure, and its capacity in terms of social facilities and amenities,**
- **Drogheda’s significant potential for employment growth, which can complement the existing compact residential growth.**
- The readily available workforce in the Greater Drogheda area, many of whom make expensive, long, environmentally unfriendly journeys to work, mainly in the Greater Dublin area.
- Drogheda has excellent public transport links including rail transport and public and private bus services – as well as proximity to Dublin Airport.
- Drogheda Port is the largest north of a Dublin-Limerick axis and has a growing number of direct sailings to mainland Europe – a key

consideration for industry post-Brexit. It is also the largest commercial regional port in the country and has just announced plans to develop a deep-water port south of Drogheda. Drogheda also has fast access to Dublin and other Ports such as Greenore; Warrenpoint and Dundalk.

- **Drogheda's location** – close to Dublin – has many advantages. For employers, it can provide an easily accessible, multi-skilled and multi-lingual workforce (many of whom are currently forced to make long commutes to Dublin to secure employment and want to work locally). It also provides excellent broadband and other facilities available in modern cities; much more affordable premises options and no traffic congestion. It also offers residents an attractive coastal lifestyle in one of the most heritage-rich parts of Ireland – and with housing costs much lower than the Dublin area.
- **Drogheda's Institute of Further Education** (DIFE) provides a key education stream for prospective third level education entrants in the County of Louth and Drogheda – through DIFE and The Mill Enterprise Centre works closely with colleges such as DkIT and DCU.
- Related to its RGC status, Drogheda – **as Ireland's largest town and emerging next city**, urgently needs a new IDA Business Park, ideally situated on the Co. Louth side where additional financial support can be provided to certain business types, given Co. **Louth's Border/BMW** status.
- LCC must now utilise all appropriate Irish and EU sources of financing **to leverage Drogheda's position as a new RGC.**

Comments on the LCC Draft CDP vs Meath Draft CDP

The Southern Environs of the town lie within the jurisdiction of Meath County Council, where there are strategically located employment and residential lands. Immediately to the south, more than 12,000 people reside in the agglomeration of Laytown-Bettystown-Mornington – and the greatest frequency of bus and rail services to/from Drogheda are concentrated here, confirming the wider, natural and immediate catchment of Drogheda being circa 52,000 – on par with Waterford City.

- Population

The Meath Draft CDP core strategy proposes 50% Growth in the Meath Part of Drogheda, as opposed to the 20% in the Louth Draft CDP. However, Louth County Council questioned the rate of planned population growth in South Drogheda proposed by Meath County Council. 50% for the whole town might be too rapid a growth rate, but 20% is clearly a very unambitious target when the Regional Policy objective is that growth occurs in the Regional Growth Centres – and especially given the potential of the PANCR to make a major contribution to the current housing shortage nationally.

Comment on Core Strategy: Setting populations and dwelling number caps on zoned land in a Regional Growth Centre during a protracted and deepening housing crisis is wrong and could act as a barrier to investment.

- Transport

Louth County Council in their submission to Meath County Council conveys support for **Meath's inclusion of a specific objective to** prepare a local transport plan for Drogheda and East Meath, which is to be prepared in association with Louth County Council. However, this objective does not appear in Louth's Draft CDP.

- Port Access Northern Cross Route (PANCR)

In relation to Drogheda Port the PANCR Louth County Council notes that –

'Drogheda Port is an important economic asset to the town. The regional significance of the Port is highlighted in the RSES with Regional Policy Objective 4.12 supporting the role of the port area. The future development of the Northern Environs of the town and redevelopment of the port area is closely linked to the construction of the Port Access Northern Cross Route (PANCR). The progression of the PANCR would result in improvements to traffic flows and movements throughout the town making it a more attractive location for potential investors. It is requested that the Written Statement for

the Southern Environs of Drogheda acknowledges the importance of the PANCR in the future development of **the town.**'

This statement by Louth County Council fails to acknowledge the importance of the PANCR to the build out of North Drogheda for housing and the ability to attract investment. On the other hand the Meath draft CDP clearly notes this. THE PANCR opens up lands for economic development adjacent to the port, and it relieves traffic congestion making the town centre public realm much better – making Drogheda a more attractive place to live, which in turn **attracts employers There is a massive** knock on effect economically – it is not stated, and needs to be. The need for a Drogheda North Railway Station (see above) also needs to be included.

At a time of a nationwide shortage of housing, and Drogheda being recently designated a Regional Growth Centre, it is imperative that the PANCR is expedited IN FULL at the earliest opportunity, given the huge social, economic and environmental benefits it confers. **A "Partial PANCR" – mooted in the draft plan in our view is "NO PANCR" and unacceptable.**

- Cross Boundary Position

Section 2.13 of LLC Draft CDP Drogheda

This section begins with an overview of Drogheda – noting the cross-boundary position between Louth and Meath and that 84% of the population live in Co. Louth.

The influence of Drogheda as a Regional Growth Centre can be considered in a much wider context. The boundary to be considered for the UAP is not yet defined **and needs to be in conjunction with the additional "Strategic Objective" (SO) which we proposed above.**

The Louth Draft CDP welcomes the requirement in the RSES to prepare a Joint Urban Area Plan for Drogheda between Louth and Meath County Councils, and it goes on to state that *'The UAP/LAP will be informed by the strategic objectives set out in this Draft Plan'*. However, no such strategic objectives are actually set out in Louth's Draft CDP with respect to the content of the UAP.

- Land Use Zoning Map

The Draft CDP for Louth includes a new land use zoning map for Drogheda. The settlement boundary appears to be defined as the combined Drogheda Borough Area together with the Northern Environs area defined by the 2004 LAP. The Southern Environs of Drogheda should be included on that map, although outside the county boundary. It is vitally important that Louth

County Council shows leadership when it comes to preparing the UAP jointly.
Joined up thinking should begin with joined up mapping.

Requested Changes to the Louth Draft CDP:

1. Include a strong unifying vision for Drogheda dispensing with references to Drogheda, South Drogheda Environs and North Drogheda Environs. There is only one settlement for consideration here – reflect it in unified mapping.
2. Remove cap on population growth and residential development imposed by the Core Strategy and Housing Allocations which unnecessarily limit growth of this Regional Growth Centre to just 20%, contrary to national policy.
3. **Encourage Government to review, enhance and extend the “Living over the Shop” scheme to protect the fabric of the centre of Drogheda, to respond to low residential occupancy in the centre; to bring fresh vibrancy and new communities into the centre; to enhance Drogheda’s “Blue Flag” status; to enhance its exceptional town centre heritage and counter the threat of on-line shopping to the core retail centre.**
4. The Plan should also seek out the opportunity to create hubs supporting emerging hybrid types of employment. Ideally, such hubs should be close to public transport and retail and other services. In that regard, areas proving unattractive to retailers - such as Narrow West Street – should be considered for such workspace developments.
5. Provide a specific policy objective in the Plan with regard to delivery of a second Rail station for Drogheda on the north side to support the delivery of **housing and investment with the purpose of also fulfilling the Plan’s stated objectives in Chapter 7.5.4 policy objectives MOV 9 and MOV 10.**

Related to this, LCC should indicate its intention to liaise with TFI; Fingal Co. Council; Dept. of Transport and other relevant bodies to advocate that Metrolink – which is proposed to terminate north of Swords – be connected to the Northern Rail line (probably at Rush & Lusk Station) to facilitate direct rail travel to/from Dublin airport to parts of Fingal; Louth; Meath and northwards to Belfast. This was suggested to LCC some years ago when the airport rail link was first mooted. Such a link would enhance travel to/from the airport for personal, commercial and tourist needs – especially for the North East.

6. Identify key deliverable employment sites for new FDI type and indigenous industry investment in Drogheda that are fit for purpose – i.e. serviced/will be serviced, accessible and of sufficient scale to enable Drogheda to better participate as a driver of growth along the Dublin Belfast corridor as per SS1 and SS2 of the RSES Regional Policy Objectives, responding to its Regional Growth Centre status.

7. Chapter 6 Tourism - Designate Drogheda as the primary tourism destination and gateway destination for County Louth **with due regard to it's proximity to Dublin Airport and Port and it's** high importance as the main heritage centre in the county - being one of the oldest and most historical towns in Ireland and the home of many unique landmark sites both in Drogheda and throughout its environs, including a UNESCO World Heritage site and a potential second one at Monasterboice **as well as it's** designated Failte Ireland destination town status. Allocate dedicated Tourism and Heritage Officers in Drogheda to **both protect and promote Greater Drogheda's exceptional** heritage in order to drive the orderly **growth and development of Drogheda's** tourism status which is currently largely neglected.

Related to this, assert best practice in shop frontage; street and information signage etc appropriate to the approaches of a Heritage Town and its centre as well enforcing compliance in respect of vacant sites and premises and **"rogue signage," thus ensuring an attractive "first impression" of Drogheda.**

8. Provide a specific policy objective in relation to the hospital in Drogheda being designated as a Regional Hospital as referred to in 2.13 of the Draft CDP.
9. 'Policy Objective SC 37 To co-operate with the HSE and other statutory and voluntary agencies and the private sector in the provision of appropriate health care facilities to all sections of the community, subject to proper planning considerations and the **principles of sustainable development.**' We request that LCC provides a framework to support the delivery of a dedicated hospice facility in Drogheda.
10. Draft CDP Table 13.2 Spot Objective no. 3- to provide for a Retirement Village in Dundalk. We are requesting that a retirement village be located in Drogheda, given its demographics and population.
11. Education – the delayed delivery of the LMETB Head Office in Drogheda needs to be rectified through the Plan to ensure compliance with the 2013 Act.
12. 'The Council supports the concept of multicampus educational arrangements, which can lead to more sustainable provision of schools through reductions in the land-take required for such developments.' – We request that through this plan, as a matter of urgency, LCC liaises with LMETB and other relevant bodies, including Third Level Institutions in Dublin and Dundalk to establish how best Drogheda can begin to provide Third Level education courses locally to respond to the key local needs in Greater Drogheda and the wider catchment.

Conclusion

We want to fully participate in the Government's vision for Ireland. We fully embrace the concept of the rationale for Regional Growth Centres and if the right opportunities and resources are afforded to Drogheda, we have no doubt that as a future city we have the ability to meet and exceed the expectations and aspirations of the National, Regional, County and Local plans that guide us.

The Draft Plan needs to:

- **capitalise on Drogheda's new (since the last CDP) status as a Regional Growth Centre**
- **recognise and capitalise on Drogheda's many strengths;**
- address shortcomings, including the non-availability of serviced land ready for industrial development;
- synergise with the opportunities presented for Drogheda by both the NDP and the **EMRA's RSES;**
- match the approach by MCC in the Southern Environs and LBM.
- Properly resource Drogheda with key LCC Staff led by the Deputy CEO, and supported by key officials responsible for Planning; Heritage; Tourism etc

We understand that following adoption of the County Plans by Louth and Meath County Council's a **Joint Urban Area Plan will be prepared for Drogheda. The scope and extent of that plan is yet to be determined.** In our opinion, it is imperative that **the new County Development Plan should clearly set out Louth's vision for its largest town and broadly define – in conjunction with the EMRA and Meath County Council – the Terms of Reference of such an UAP, ideally setting out broad and comprehensive criteria for review. An explicit "Strategic Objective" (SO) to that effect needs to be included in the LCC CDP.**

There is an urgent need to address these issues before delivery of the final plan. This should be done now in the interest of the growth and development of the Greater Drogheda Area and its people over the next decade.

ENDS SUBMITTED BY DROGHEDA CITY STATUS GROUP 23.12.2020