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## **Meath County Council**

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22<sup>nd</sup> December 2020

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

### **Re: Draft Louth County Development Plan 2021-2027**

Dear Sir or Madam,

Thank you for your recent consultation in relation to the Draft Louth County Development Plan 2021-2027. Meath County Council welcomes the opportunity to comment on the Draft Plan and associated Environmental Assessments. Please find hereunder the comments of Meath County Council in this regard.

#### **Meath County Development Plan Review**

By way of context, and as you are aware Meath County Council is preparing the Meath County Development Plan for the period 2021-2027. We are currently reviewing the CE's Report on the submissions received (c.2,450) on the Draft Development Plan with the Elected Members of Meath County Council. Noting that County Meath shares an administrative boundary with Louth, the preparation of these plans simultaneously is an opportunity to apply policy alignment in cross-boundary areas, thereby achieving consistency and consensus in the application of Development Plan policies.

Meath County Council recognises and welcomes the broad range of issues which are outlined in the Draft Plan and is fully committed to contributing to the future sustainable development and growth of the county where appropriate.

#### **The Eastern and Midland Regional Spatial and Economic Strategy 2019-2031**

The RSES for the Eastern and Midland Region 2019-2031 sets out a framework to direct future growth of this region over the medium to long term and implement the strategic planning framework set out in the NPF. Meath County Council recognises the important role that both

Meath County Council and Louth County Council play in the implementation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-31.

### **Local Authority Collaboration and the Joint Drogheda Urban Area Plan**

MCC welcomes policy objectives CS 9, SS3 and section 2.13.1 of the written statement relating to the preparation of a Joint Urban Area Plan for the Regional Growth Centre of Drogheda in accordance with the requirement of objective RPO 4.11 of the RSES. Meath County Council are fully committed to this process and it is noted that there is ongoing engagement between both local authorities as well as the Eastern and Midland Regional Assembly. It will be important that this Joint Urban Area Plan is prepared in line with the provisions of national and regional planning policies/guidelines. The preparation of the Joint Urban Area Plan should address the implementation of the tiered zoning approach as well as the recently issued guidance in relation to the preparation of a Housing Need Demand Assessment.

Having reviewed the Core Strategy outlined in this Draft Plan, it is submitted that the allocation provided should only apply pending the preparation of the Joint Urban Area Plan by both Louth and Meath County Councils. It is considered that the allocation of population/housing growth across the two administrative areas of Drogheda should depend on the tiered zoning approach so as to ensure that the sites zoned for housing can deliver housing units during the period of the Joint Urban Area Plan. It is noted as part of the Draft Meath County Development Plan 2021-2027 that Meath County Council will monitor and control the number of units granted in the Southern Drogheda Environs area prior to the adoption of the Joint Urban Area Plan (CS OBJ 8). A similar provision as part of the Draft Louth County Development Plan 2021-2027 would be welcomed to ensure the management of development prior to the adoption of the Joint Urban Area Plan. In this regard it is suggested that Policy Objective HOU 6 as presented in the Housing Strategy of the Draft Plan could be amended for this purpose.

Furthermore, it is noted in the Draft Plan that certain areas have been noted as a priority for development through the Joint Urban Area Plan, for example section 2.13.6 relating to the Northern Environs of Drogheda. It is noted in the Draft Plan that the lands in the Northern Environs will be included in the Joint Urban Area Plan and that these lands are a priority to be delivered in a phased manner as outlined in the 2006 masterplan for the area. It is submitted that outlining such an approach in the Draft Development Plan is premature particularly as there has not been an agreement at this stage on the approach to preparing the Joint Urban Area Plan between the two local authorities. Furthermore, by identifying specific areas for development, there is a concern that this could impact on the preparation of the plan as well as potentially predetermining the evaluation of alternatives that would form part of the Strategic Environmental Assessment of the Joint Urban Area Plan. As such, it is requested that any reference to a specific area being included in the Drogheda Joint Urban Area Plan is removed at this stage and should only be included once the Drogheda Joint Urban Area Plan is finalised.

In this regard, we wish to emphasise our willingness to engage with Louth County Council on this important cross boundary project which holds the potential to further the economic growth and competitiveness of the region.

### **Local Transport Plan**

MCC welcomes the inclusion of MOV OBJ 4 which relates to the preparation of a local Transport Plan for Drogheda. This will form a key tenant of the Joint Plan for Drogheda and will ensure that the infrastructure investment required to facilitate economic investment and population growth is identified. This Plan will outline the transport priorities for Drogheda in terms of public transport infrastructure and services; cycle investment; improvements to the pedestrian environment; and road enhancements in line with the NPF's objective of 'compact smart growth'.

### **Green Infrastructure**

MCC supports the delivery of settlement strategy policy objective SS18 which seeks to develop a network of green areas throughout the town of Drogheda including the delivery of a greenway along the north and southern banks of the River Boyne stretching from Townley Hall to Baltray and Oldbridge to Mornington in Co. Meath. Meath County Council fully endorses the Greenway programme and recognises its value from an economic, health, community and rural regeneration perspective.

### **Dublin-Belfast Economic Corridor**

The NPF and RSES highlight the importance of the Dublin-Belfast Economic corridor in supporting economic growth and maintaining economic competitiveness. The identification of the Dublin-Belfast Economic Corridor as an area of significant economic potential and the policies supporting economic development along this Corridor in Section 5.7 are acknowledged and welcomed. In particular MCC is fully supportive of EE2 *'To engage and work closely with the Eastern and Midlands Regional Authority and adjoining Local Authorities in promoting economic development along the Dublin Belfast Economic Corridor.'*

### **Tourism**

The introduction of Ireland's Ancient East programme and the increasing awareness of the Boyne Valley as a national tourism destination highlights the immediate scope for tourism growth within the region. In this context MCC welcomes the recognition of the importance of the Boyne Valley Tourism Strategy in Section 6.2.1 of the Draft Plan. Such a policy approach will support the Boyne Valley Tourism Plan which will identify key projects that will act as a stimulus for tourism development and bring the Boyne Valley brand to the next level through marketing innovation and ultimately support the creation of employment through increased tourism activity.

## **Rural Housing Policy**

MCC acknowledges the influence of national and regional policy on the Rural Housing Policy prescribed in the Draft Louth Development Plan. As outlined in the Eastern and Midland RSES and the NPF, a distinction should be made between areas under urban influence and rural areas. MCC note the designations in the Draft Louth CDP of 'Rural Policy Zone 1 *'Area Under Strong Urban Influence and of Significant Landscape Value'* and Rural Policy Zone 2 *'Area Under Strong Urban Influence'* and the associated policy approach. This approach is supported by Meath County Council and is generally aligned with the Rural Development Pressure Map in the Draft Meath County Development Plan 2020-2026.

It is acknowledged that the rural housing needs policy proposed in the Draft Louth County Development Plan has (similar to the Draft Meath CDP) incorporated additional individual requirements in order to fulfill the rural housing needs criteria. Given the proximity of County Meath and Louth to the Dublin region, this approach is considered necessary to respond to the pressures arising from urban generated housing demands and to protect the wider countryside.

Urban generated pressures and the decline of rural towns and villages are issues common to both counties. Meath County Council welcomes the focus on the Draft Plan on rural towns and villages to combat the decline of settlements and their rural hinterland. Meath County Council also acknowledges the designation of 24 no. Level 5 rural villages (where rural housing needs apply) into the Draft Plan which provides a sustainable alternative to one-off housing in the open countryside. The identification of these settlements is similar to the 'Rural Node' concept which is included in the Draft Meath County Development Plan. Meath County Council supports the inclusion of this policy which establishes a generally consistent approach to rural housing demands.

## **Brú na Bóinne**

The international significance and archaeological importance of the Brú na Bóinne World Heritage Site is highlighted in Section 9.3.4 UNESCO World Heritage Site – Brú na Bóinne. Meath County Council welcomes the continued support and partnership approach with Louth County Council and other agencies in promoting, conserving, and managing the UNESCO World Heritage Site of Brú na Bóinne.

Meath County Council note HOS 46 and Section 13. 9.40 of the Draft Plan which states that *'Section 13.26.9 - sets out specific criteria that is required to be considered for developments that are in proximity to the Brú na Bóinne UNESCO World Heritage Site, the Tentative World Heritage Site of Monasterboice, and the Battle of the Boyne Battlefield Sites'*. However, section 13.26.9 does not equate with numbering in the draft plan. Should this perhaps read 13.17.10?

Section 13.17.10 outlines the Development Management Assessment Criteria for Brú na Bóinne, UNESCO World Heritage Site. It is considered appropriate that specific reference should be made to the need to protect the Outstanding Universal Value of the UNESCO World Heritage Site of Brú na Bóinne.

It is noted also, that 9.3.5.1 refers to the Brú na Bóinne Management Plan, 2017. MCC request that consideration be given to the inclusion of a specific objective to support the implementation of this Plan.

### **Cross Boundary Infrastructure Requirements**

Since the establishment of a National Water Utility in 2014, local authorities engage with Irish Water in relation to cross boundary water and wastewater projects. Notwithstanding this, efficient and optimal outcomes can be best achieved through early engagement between local authorities regarding network capacities and issues. We request that Louth County Council continue to work collaboratively with Meath Co. Co. and Irish Water in exploring, planning and developing cross county boundary Water Services proposals.

### **Conclusion**

In summation, MCC generally support the policies and objectives contained within the Draft Plan and we look forward to working with Louth County Council and the other local authorities in the Region to achieve the objectives and guiding principles set out in the RSES, including sustaining the economic growth and competitiveness of the Eastern Midlands region.

Meath County Council respectfully requests that the points outlined above are considered in the finalisation of the Louth County Development Plan. Please do not hesitate to contact us if you require clarification or any further information on the issues raised in this submission.

Yours Sincerely,

Alan Russell  
A/Senior Executive Planner  
Meath County Council