



Section 4: Chief Executive's Summary, Response and Recommendation on General Submissions

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No.	LCDP DR002
Submitted by:	Oriel River Catchments and Coastal Association
Theme (s):	Chapter 8

Summary of Submission:

- Good water quality is the benchmark for vibrant communities. Improving the quality of the County's water will have positive effects regarding recreation, tourism, well-being, business, drinking water and engaged prosperous communities. Louth County Council should be striving to ensure that the water quality of the County's rivers, lakes and coastal water achieve, as a minimum, Good Ecological Status as per Ireland's commitment under the EU Water Framework Directive. Louth has no water classified as being of high ecological status. Improving water quality should be a priority.
- Most of the urban wastewater treatment plants in the County are running over their design capacity and will experience further pressure e.g. Dundalk South.
- Pressure is being exerted on our rivers and streams through sluicing of surface water and untreated waste water e.g. through storm water overflows.
- Dundalk Bay is a SAC/ SPA and a Ramsar wetland of international importance.
- County Louth depends on many ecosystem services provided by its rivers, lakes, coasts, sea and bays.

Chief Executive's Response:

The Draft Plan acknowledges that economic, social and environmental well-being of County Louth requires water quality to be of the highest possible standard. To this extent, policy objectives are included which focus on maintaining the highest water quality. Specific policy objectives include ENV15 to ENV 19. ENV 18 is to protect fisheries in all rivers in the County, where appropriate, including relevant species as contained in Annex II of the Habitats Directive.

The importance of wetlands is also acknowledged within the Plan. Policy objectives which focus on the protection of wetlands are included within NBG 19 to NBG 22. NBG 20 is to protect and enhance wetland sites that have been rated A (International), B (National), C+ (County), C and D importance in the Louth Wetland Surveys and any subsequent versions thereof.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR014
Submitted by:	Ciaran McCreanor
Theme (s):	General

Summary of Submission:

- Village contains many derelict idle buildings which detract from aesthetics.
- No assistance to rebuild Foleys tearooms
- No car-parking which detracts from business.
- No suitable walking routes, route suggested along Glyde River to playground or a greenway along Seabank Road linking to Blackrock
- Promotion of Castlebellingham history and tidy towns funding towards a heritage garden for older people.

Chief Executive's Response:

It is acknowledged that vacancy is an issue in Castlebellingham in addition to towns and villages throughout the County. The Draft Plan recognises the importance of re-invigorating town and village centres in creating balanced and sustainable communities and will support the re-use and redevelopment of town and village centre lands for appropriate uses that would bring vibrancy and vitality back to these centres whilst also supporting the principles of consolidation and compact growth.

There is no remit in the Development Plan process to provide funding for redevelopment of buildings such as Foley's Tearooms. Funding was previously provided by Louth County Council for the thatching of the roof.

Section 2.7 of the Written Statement for Castlebellingham/Kilsaran identifies the opportunity of improving public access to and the public amenity potential of the River Glyde. In addition policy objective CAS 15 supports the investigation of the development potential of providing additional walkways and cycleways in the town.

The Draft Plan also recognises the importance of the natural and built heritage of Castlebellingham and will support any investment that will positively contribute to the character and heritage of the town and make it a more attractive location to live, work, and visit.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR016
Submitted by:	Nila Kolosinska
Theme (s):	General

Summary of Submission:

Support for area in which submitter resides
 Concern expressed regarding anti- social behaviour
 Request to keep area in which they reside free from anti-social behaviour.

Chief Executive's Response:

One of the underlying principles of the Draft Plan is to create attractive and safe environments where people can feel safe and enjoy a high quality of life.

It is recognised that anti-social behaviour is an issue in some neighbourhoods in towns and villages in the County. Whilst the Development Plan cannot solve this issue it can put in place a policy framework that promotes and supports a co-ordinated and multi-agency approach to addressing such issues. This can include investment in community facilities, better quality open spaces, and more passive surveillance within neighbourhoods. The integration of these design principles into the Draft Plan will assist in creating more attractive and safer neighbourhoods in the County.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR025
Submitted by:	Lower Shore Residents Association
Theme (s):	SPA/SAC, pNHA, ZAP, RPS, Narrow Water Bridge , Flooding

Summary of Submission:

- Proposed Upgrading for local area of SAC to SPA: Shore line is within Carlingford Shore Special area of conservation (SAC 002306), however, this has failed to deter the destruction and removal of native mussel beds between Narrow Water and Warrenpoint. Upgrade of Newry River to Carlingford Lough interchange to a Special Protected Area (SPA) would prevent exploitation and safeguard against industrial and commercial environmental risk.
- Consider wooded area around Narrow Water, 'Ferry Woods' as a Proposed Natural Heritage Areas (pNHA), rich in flora and fauna and archaeological history.
- Given the abundance of Fauna found in the Omeath area and continual damage to same, would like to see focus on defence as well as current status. List of protected fauna provided.
- Omeath has neither zones of archaeological potential nor no mention of any adjoining. Archaeological study (part of narrow water bridge project) has been undertaken at 'Ferry Woods' Cornamucklagh, within it lie the remains of a large ecclesiastical settlement known as Killansnamh (LH002-001002). This may have been the original centre of Omeath. Details provided regarding the history of the site. This should at least be acknowledged as a Zone of archaeological potential.
- Preservation of remains of Rundale field system. Policy Objective OTH 19 is to protect the Area of High Scenic Quality (AHSQ) in the landscape setting. The surrounding townlands especially in Cornamucklagh show the evident remains of the old Rundale field system, it has long defined our unique rural landscape. Given the communities relatively recent Irish language use it retained many Gaelic field and place names. Concern expressed that future developments will not have regard to same.

- Additions to RPS:
 - Granite railway bridge built circa 1890's Located at the entrance to Narrow Water Wood which may span the proposed greenway addition (- 54.1094322, -6.2860522)
 - Granite railway bridge built circa 1890's Located on private land (54.1066721, - 6.2785925) 3
 - A folly built circa 1800-1860 among the forest area surrounding the Park Hotel
 - No reference in the archaeological register to two earth works situated either side of the road in upper Lislea. They may have been overlooked previously and are due consideration. (54.09682076, -6.28916859) (54.09739014, -6.28787577)
- Omeath Development Plan - concern expressed regarding impact of the Narrow Water Bridge and the potential to become a satellite community to Warrenpoint.
- The OPW's flood risk assessment doesn't seem to have carried out a risk assessment in relation to the shore. Area along shore is at risk, there is a high probability of flooding and flooding has consequences. Images provided showing flood events. There has been deterioration in riverbank and shoreline defences, a solution is required.

Chief Executive's Response:

- There has been no map submitted with the submission which renders it somewhat difficult to identify locations with certainty. All effort was made to respond in a comprehensive manner.
- Both SAC's and SPA's are designated European Sites which form part of the Natura 2000 Network of European Sites. The legal basis on which SACs are selected and designated is the EU Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended. The Directive lists certain habitats and species that must be protected within SACs. Special Protection Areas are designated areas of protection under the European Union Birds Directive and are in place to protect rare and vulnerable bird species, migratory bird species, and wetlands that are deemed to be internationally important. Such designations lie outside the remit of the Development Plan.
- Wildlife sites of national importance including both ecological and geological sites are designated as Natural Heritage Areas under the Wildlife (Amendment) Act 2000. Sites identified but not yet designated are known as 'proposed Natural Heritage Areas' (pNHAs) which are protected from development only by inclusion in the Development Plan. It is the National Parks and Wildlife Service who designate Natural Heritage Areas.
- Louth is home to and supports many plants, animals and bird species. Certain species that are deemed rare and threatened and located outside of designated sites are protected by law as they require special measures to ensure their continued survival. The Council, in recognition of development that may affect plants, birds or other animal species protected by law will consult with the NPWS, taking account of their views and any licensing requirements. The Draft Plan also seeks to protect biodiversity in non-designated sites due to their ecological value and in their service as stepping stones in a wider ecological network. To this end, policy seeks to ensure that no part of the ecological network are lost without remediation, that development proposals improve ecological coherence and where appropriate conserve biodiversity sites outside of designated sites.

- An Urban Archaeology Survey was completed in 1995 and contained reports on historic towns dating to before AD 1700 with a view to delineating zones of archaeological potential which were issued to Local Authorities. These are included and identified as the Zones of Archaeological Potential in the current Draft Plan. Such designation is within the remit of the National Monuments Service and under the National Monuments Acts 1930-2014.
- The Sites and Monuments within the Village are identified on the Omeath Draft Composite Map and supported by Development Policy Objective (OTH 18) and those outside the development boundary of Omeath (including LH002-001002) are identified on the Record of Monuments and Places (RMP) of County Louth, the protection of which is supported in policy objectives of the Draft Plan (BHC 1-BHC6).
- The areas of High Scenic Quality (AHSQ) whilst not possessing the exceptional natural beauty of the Areas of Outstanding Natural Beauty, nevertheless add significantly to the stock of natural scenic landscapes within the County. These areas are farmed although the quality of the farming land varies from area to area. The Council considers it important that the AHSQ are protected from excessive development particularly from inappropriate one off, urban generated housing in order to preserve the unspoiled rural landscape. This principle is supported in Policy Objective NBG 37 in conjunction with the local housing need qualifying criteria and supporting policy objectives (HOU 36-HOU 46).
- It is recommended that the folly located in the forest area of the Park Hotel is included in the RPS. With regard to the railway bridges, whilst it is recognised that these are of architectural merit, it is considered that there is no risk to their integrity in the short to medium term. It is therefore not considered necessary to add the railway bridges to the Record of Protected Structures.
- Omeath is identified as a Small Town and Village (Level 4) in the Draft Plan. Herein, the growth strategy for such settlements will focus on localised sustainable growth that meets the needs of the local population. New residential development will be proportionate to the size of the settlement with priority given to infill and brownfield sites. Economic and employment related development that would strengthen the local employment base which is weak in Omeath and reduce the dependence on commuting will also be supported. The Draft Plan seeks to create vibrant rural communities by targeting and promoting sustainable growth in rural towns. The Narrow Water Bridge Project is identified as a project of historic and symbolic significance that would support local tourism and economic development on both sides of the border and which is supported in the National Development Plan 2018-2027 and in the Draft Plan (MOV 45).
- In 2011 the Office for Public Works, (OPW), carried out a national screening exercise, known as the Preliminary Flood Risk Assessment, (PFRA). The PFRA was based on available information, taking into account all sources of flood risk, and its sole purpose was to scope the National Catchment Flood Risk Assessment and Management (CFRAM) Programme and identify areas of potentially significant flood risk. These areas most likely to be impacted by future coastal and fluvial flooding were then brought forward into the OPW CFRAM Programme which produced the Flood Risk Management Plans, (FRMP's) and ultimately lead to the roll out of the existing Flood Defence Projects, including those in Dundalk, Ardee, Drogheda, Baltray, Carlingford and Greenore in County Louth.

- Funding is also available from OPW, subject to compliance with strict Cost Benefit Criteria, through the Minor Works Programme, to protect existing residences and Public Infrastructure in areas that are vulnerable to Flooding or Coastal Erosion.

Chief Executive's Recommendation

It is recommended that the folly located in the forest area of the Park Hotel be added to the RPS based on the Conservation Assessment completed and attached in Appendix 9.

Submission No.	LCDP DR026
Submitted by:	Carlingford Lough Ferry
Theme (s):	Chapter 6: Section 6.3.8

Summary of Submission:

Request that a specific policy objective should be set in regard to the Carlingford Lough Ferry service, to both protect and support the development of this important and existing cross border service.

In support:

- Section 6.3.8 of the draft Louth County Development Plan refers to Carlingford Lough Ferry, it is believed that the impact the Ferry plays in tourism development is not fully captured.
- Background to development of Ferry is provided:
- Improved cross border access: Since commencing operations, Carlingford Lough Ferry has offered a valuable cross border community and tourism link. To date, the service has transported 141,620 vehicles and 497,278 passengers. There has been continuous growth and feedback from locals is very positive.
- Policy Objectives TOU 17 and TOU 18 are noted. The Carlingford Lough Ferry has continued to successfully expand its range of services including passenger cruises, and they have invested in an on-board audio system and cycle lounge. Marketing is based on destination rather than product, it promotes destinations both north and south of the border. They will continue to work in collaboration with Fáilte Ireland and Tourism NI, local food producers and breweries to develop and promote sustainable tourism.
- Carlingford Lough Ferry, as an existing cross-border service, playing a key role in the development of tourism in Co. Louth.
- The roll-on, roll-off domestic ferry service has significant potential, no other such facility has access to the extent of population within a one-hour drive time. Keen to work in collaboration with LCC. Confident that Narrow Water Bridge will complement existing and future service.

Chief Executive's Response:

Section 6.3.8 of the Tourism chapter provides general detail in relation to the Carlingford Lough Ferry. This is provided in the context of its contribution to tourism within the County. It is not considered that a specific policy objective for the Carlingford Lough Ferry is required or appropriate within the Plan.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR027
Submitted by:	Blackrock Tidy Towns
Theme (s):	General

Summary of Submission:

Hope that the planned Local Area Plan (ref. Chapter 2, CS10) will afford due recognition to the separate identity of Blackrock

Support for the following MOV30, MOV 49, MOV50, Chapter 8 and Appendix 5 which recognise the value of a range of trees and stands of trees. Also support for the inclusion of the coastal road through the village as a Scenic Route (Chapter 8, Table 8.19/SR23), the inclusion of a number of Views and Prospects (Chapter 8 and Appendix 6) and the recognition of the special amenity value of Louth Bank Walls (Appendix 8 – GI6).

Request following amendments:

- Description of VP46 in Table 8.15 should be modified to “Views over the River Fane Estuary on the R132 from Rock Court to St. Fursey’s Terrace”).
- VP47 on Map 8.17 is incorrect as it is placed at Haggardstown Old Graveyard on the Old Golf Links Road rather than at St. Fursey’s Church in Haggardstown further to the west
- Include Main Street, Blackrock as a Level 3 Retailing Centre in Chapter 5, Table 5.2. Otherwise the retail/commercial centre of the village is not recognised at all in the Draft Plan.
- Include a policy to provide additional off-street parking in the vicinity of the village centre to cater for growth of commercial activity and tourism.
- Include a planned upgrading of Sandy Lane, to include improved footpaths and undergrounding of overhead networks.
- As part of the longer term plan for the Louth Coastal Way, include the construction of a pedestrian and Cycleway Bridge over the mouth of the River Fane in the vicinity of the entrance to Fane View housing estate.
- Planned flood defences should incorporate a restoration of the northern portion of the main beach as per study carried out by Aquafact International Services in 2009.
- Relevant findings and recommendations from the following reports, ‘Ecology and Biodiversity Enhancement Plan for Blackrock (2019)’ and ‘The Architecture of Main Street, Blackrock’ (2008) be taken into account.

Chief Executive’s Response:

Support for a large number of policy objectives included in the Draft Plan is both noted and welcomed. Notwithstanding this there are a number of amendments proposed, the responses to which are outlined below:

- The description of views and prospects as provided in the Draft Plan are broad in narrative. The proposed amendment is confining. As such, proposals for more detailed description as proposed are not appropriate.
- The location of VP 47 will be amended on Map 8.17
- The principal retail area of Blackrock is zoned B1 Town/Village centre as per Map 1.2. As Blackrock is within the urban footprint of Dundalk, it is captured under the category of ‘Level 3 - Neighbourhood Centre within the Retail Hierarchy (Table 16.0, Retail Strategy).

- An additional policy objective for the provision of further off street car parking is an issue which is more appropriately dealt with during the preparation of the Dundalk LAP.
- Upgrades to specific roads and footpaths are covered under general improvement works undertaken by the Council and financed through a range of funding schemes. Such specific local maintenance and upgrade works are not addressed in the Draft Plan, but rather more suitably at a local level, namely the preparation of the Dundalk LAP.
- Policy Objective MOV 26 seeks to plan and develop a Louth Coastal Way along the east coast of the County, subject to environmental considerations. It is anticipated that as part of the Louth coastal defence project that elements of the Dundalk to Blackrock Greenway will be incorporated into these schemes. Inclusion of the additional wording as proposed would be premature at this juncture as the flood defence schemes are only in their infancy, with routes, types of defences, and locations yet to be considered and indeed their capacity to incorporate a greenway/cycle way/pedestrian walk etc.
- Any flood remedial works may include incorporation of Public Realm Improvements such as Greenways or Cycle Paths where feasible but will not include beach restoration works.
- Issues relating to both the protection of the natural heritage and biodiversity of County Louth in addition to the built heritage and culture of the County are addressed in Chapters 8 and 9 of the Draft Plan which are in accordance with national and regional policy. Recommendations for the inclusion of specific reports in relation to Blackrock are not considered appropriate in the Draft Plan and may be more suitably considered at a local level during the preparation of the Dundalk LAP.

Chief Executive's Recommendation

- Amend location of VP 47 on Map 18.17

Submission No.	LCDP DR059
Submitted by:	Mary Matthews
Theme (s):	Chapters 7, 11

Summary of Submission:

Submission is in relation to Dunleer and requests the following:

- Identify suitable location for pelican crossings, one to the north and the other to the south.
- Address the problem of all day, no charge, parking resulting in a shortage of parking spaces and traffic congestion
- Re-open train station consider opening a regional train station convenient to Junction 14 on the motorway
- Given the prominence of the Glen Dimplex Research and Development unit on the Barn Road and the work of the Market House based environmental project (linked into the Institute in Dundalk) Dunleer should be developed and promoted as a centre of excellence for clean energy.

Chief Executive's Response:

The identification of a suitable location for a pelican crossing and traffic management/dealing with traffic congestion are operational issues that would not fall under the remit of the County Development Plan.

Submission 89 from the National Transport Authority and the C.E Response and recommendation addresses the issue of the re-opening of the rail station and additional rail stations in the County.

It is recognised that the Glen Dimplex facility in Dunleer provides the town with a high profile employer in the appliance and energy innovation sector. Section 5.15 of the Draft Plan sets out the economic strengths of Dunleer. Policy objective EE 48 promotes economic development, innovation, and research and development. This plan will continue to support the development of new and expansion of existing enterprises in the town.

Chief Executive's Recommendation

No Change

Submission No.

LCDP DR085

Submitted by:

Irish Wheelchair Association

Theme (s):

General

Summary of Submission:

Supportive of Drogheda 'Changing Places' Campaign which is seeking to have at least 1 x12m² specifically designed toilet facility located in Drogheda. This would enable people with complex disabilities to participate in all aspects of community life.

Louth County Council has been proactive in many initiatives and implementing the 'Changing Places Initiative' would see the Council leading the field.

Chief Executive's Response:

Recognition for and acknowledgement of the quantum of people with disabilities both nationally and within County Louth is noted. The Council has produced a *Healthy Ireland for Louth Plan 2018-2022* and a *Louth- Disability Inclusion Plan 2017-2022* which fully integrates with the Louth LECP. Policy Objective SC 4 of the Draft Plan supports implementation of this Disability Inclusion Plan.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR087
Submitted by:	Mervyn Booth
Theme (s):	Chapter 3

Summary of Submission:

Request change of wording to HOU 38 from: “ immediately surrounding the development boundary of towns and villages” to read “surrounding towns and villages”

Chief Executive’s Response:

The purpose of this policy objective is to ensure there is a distinction between the development boundary of settlements and any development that takes place in the open countryside. It is acknowledged that the inclusion of the word “immediately” may be too prescriptive.

This could be addressed by amending the wording of HOU 38 as follows:

To reserve as decarbonisation zones, agricultural, open space, or recreational use lands, immediately surrounding **or in the immediate vicinity of** the development boundary of towns and villages in the County in order to prevent sprawl and a linear pattern of development, and to ensure there is a distinction between built up areas and the open countryside.

Chief Executive’s Recommendation

Amend the wording of policy objective HOU 38 as follows:

To reserve as decarbonisation zones, agricultural, open space, or recreational use lands, immediately surrounding **or in the immediate vicinity of** the development boundary of towns and villages in the County in order to prevent sprawl and a linear pattern of development, and to ensure there is a distinction between built up areas and the open countryside.

Submission No.:	LCDP DR088
Submitted By	Aidan Maguire
Theme (s):	Chapter 4

Summary of Submission:

Key elements of the Plan include: Emergency Planning, health services, transport links, housing.

The following comments are made: Drogheda has an accident and emergency hospital and Beaumont is only a short trip away. Drogheda fire Service has a chemical incident unit. Drogheda has a divisional Garda Headquarters and Sniffer dogs will be based in Drogheda. Drogheda Port has transport links with Europe. Drogheda can receive emergency responses from Dublin. The Northern Cross Route will assist with traffic flow; will help carbon footprint and infection control. An all-purpose stadium could be built with a clinic which would assist with revenue. A railway track could be included in Plan.

Chief Executive's Response:

Acknowledgement of the range of emergency services available in Drogheda including Gardaí headquarters and Drogheda's transport links to Europe are all noted. Policy objectives of the Draft Plan support these services. The Drogheda Cross Route and its importance in helping the delivery of housing is noted. The Draft Plan recognises that this is a critical piece of enabling infrastructure that provides both a direct link from the Port to the M1 while also releasing strategically located employment and residential lands in the northern environs of the town (MOV 39 and MOV 43).

There are currently adequate lands identified and zoned and supported in policy to accommodate the provision of such uses as a stadium. The Draft Plan in policy supports additional capacity, expansion and improved services in the rail network.

Chief Executive's Recommendation :

No Change

Submission No.	LCDP DR096
Submitted by:	Julie Clarke
Theme (s):	Section 2.6.5 Trees and Woodland Chapters 4, 7

Summary of Submission:

Request

- Under the current Louth County Development Plan ' Historic Gardens and Designed Landscapes of what was 'Arthurstown House' were preserved (LH003) on both a historical and environmental stand point it is requested that this is carried forward in the draft Louth CDP 2021-2027.
- The trees and planting around Arthurstown House should also be protected (protected in current Plan)
Photos of house, curtilage and trees / planting are provided along with a brief history of 'Arthurstown House'
- MOV 40 should be amended to read:

Amendment should be "To support the progression of the long term upgrade of the **existing** N2 and in particular to protect the selected route (Route A/Yellow Route) of the upgrade road scheme between Ardee and Castleblayney"

In support it is stated that Jacobs engineering published that the preferred route would be 'Option A/ Yellow Route, have been told that this is not going to change.

- Request for wording change, funding has already been promised by the TII to upgrade the existing N2 if the wording in the new Louth CDP 2021-2027 changes to extract provided (as per page 146 of the Monaghan County Development Plan 2019-2025).

This would be in compliance with National Strategic Outcome 2 of the National Planning Framework which pertains to "Upgrading access to the North- West Border area, utilising existing routes (N"/N14/A5).

In order to facilitate remote working and learning as a result of Covid 19 good quality broadband is more important than a new road. Traffic statistics along the N2 Ardee to Castleblayney Road have been provided.

RSA accident statistics have been provided along the N2 Ardee to Castleblayney Road, which show that many accidents were caused by driver error rather than road layout. The existing N2 is a good candidate for an upgrade according to former Louth County Council engineer and evidenced by LCC choice of current N2 route in 2004/5.

Chief Executive's Response:

Arthurstown House

Arthurstown House is included in the list of Historic Gardens and Designated Landscapes in Table 9.5 of the Draft Plan while Arthurstown House is included in the List of Protected Structures in the Draft Plan LH-5014-24.

This designation applies to all parts of the structure including the land around it and any structure on the land within its curtilage. Therefore the walled garden would be protected under this designation.

N2 Upgrade

The preferred route corridor for the N2 Ardee to Castleblayney upgrade was published together with the Option Selection Report in February 2021. This route corridor (Option A Yellow) predominantly follows the existing alignment of the N2.

It is not considered necessary to refer specifically to this route as the policy objective clearly refers to the protection of the selected route.

Whilst it is acknowledged that Covid-19 has changed working and travel patterns, it is important that there is continued infrastructural investment to improve connectivity and maintain competitiveness. In this regard, the N2 upgrade is a fundamental element of improving regional connectivity and assisting in achieving balanced regional development.

Chief Executive's Recommendation

No Change

Submission No.

LCDP DR140

Submitted by:

Christopher O'Rourke

Theme (s):

Chapter 11

Summary of Submission:

- Of each 10 acres that are put forward for zoning, 1 acre is gifted to the Community for Community Housing, Office Hubs, Play Areas and other services. This is in addition to the Social and Affordable, and the 15% Open Space.
- Reclaim up to 20m or more if needed to the rear of each property or landholding. Construct mass concrete walls to the new property boundaries.

The re-nourishment will provide sand and regeneration of burrows outside these boundaries.

Immediately apply for the 160million euro that is needed for this work.

Chief Executive's Response:

- The Plan is responsible for land zonings throughout the County, including the Regional Growth Centres of Drogheda and Dundalk. Ownership of land (and the 'gifting' of land) is not considered or is within the scope of the County Development Plan.
- Coastal Protection and Flooding is addressed within Section 11.5.3 of the Draft Plan. The Plan sets out the overarching policies with regards to coastal protection and development. ENV 53 is to employ soft engineering techniques as an alternative to hard coastal defence works, wherever possible. The implementation of specific engineering solutions and funding for such projects is beyond the scope of the County Development Plan.

Chief Executive's Recommendation

No Change

Submission No.:	LCDP DR0154
Submitted By	Changing Places for Drogheda and Beyond
Theme (s):	Chapter 4

Summary of Submission:

To procure and provide a Changing Places facility, in the right location in a public building, in Drogheda. Ideally housing a Changing Places facility in a public building will ensure that it will be maintained and managed to high standards, O'Reilly's in Narrow West St, West Gate area and the Dominican Church are suggested.

In support:

- 600,000 people in Ireland have a profound disability (13.5%) of which 14% are in County Louth.
- Changing Places toilets are designed to support the disabled community and provide access to public toilet facilities that meet more complex needs, while offering more space and additional equipment.
- Requirements of such facilities are outlined.
- Detailed statistics provided regarding the number of people in Ireland and Louth with a disability.
- There are 14 existing changing places facilities registered throughout the county. Inishowen in Donegal are also campaigning for one.
- Breakdown of estimated cost is provided, it is suggested that a nominal fee is charged which would generate revenue for upkeep.
- View from individuals on the matter are provided.
- Inclusion, accessibility and acceptance are paramount.

Chief Executive's Response:

Recognition for and acknowledgement of the quantum of people with disabilities both nationally and within County Louth is noted. The Council has produced a *Healthy Ireland for Louth Plan 2018-2022* and a *Louth- Disability Inclusion Plan 2017-2022* which fully integrates with the Louth LECP. Policy Objective SC 4 of the Draft Plan supports implementation of this Disability Inclusion Plan.

Chief Executive's Recommendation :

No Change

Submission No.:

LCDP DR164

Submitted By

Emma Payne on behalf of N2 Ardee to Castleblayney
Concerned Residents Group.
Petition of 1370 signatories.

Theme (s):

Chapter 7

Summary of Submission:

Request amend to MOV 40

To support the progression of the long term upgrade of the existing N2 and in particular to protect the selected route (Route A/ Yellow Route) of the upgrade road scheme between Ardee and Castleblayney.

Chief Executive's Response:

The preferred route corridor for the N2 Ardee to Castleblayney upgrade was published together with the Option Selection Report in February 2021. This route corridor (Option A Yellow) predominantly follows the existing alignment of the N2.

It is not considered necessary to refer specifically to this route as the policy objective clearly refers to the protection of the selected route.

Chief Executive's Recommendation :

No Change

Submission No.:

LCDP DR0165

Submitted By

Miriam Roe and Dermot Mc Dermott

Theme (s):

Chapter 7

Summary of Submission:

Requested amendment to MOV 40

To support the progression of the long term upgrade of the existing N2 and in particular to protect the selected route (Route A/ Yellow Route) of the upgrade road scheme between Ardee and Castleblayney. Request to change wording associated with MOV 40, see excerpt from Monaghan County Development Plan 2019-2025, hereunder.

In support:

- Wording in MOV must be amended to reflect recent announcement with regard to the upgrade of the N2, Ardee to Castleblayney Section.
- Monaghan and Louth County Council in conjunction with Jacobs Philips engineering published the emerging preferred route Option A or Yellow Route on 23rd August 2020. This route (within County Louth) is the existing N2 Road.
- T11 have confirmed funding for the upgrade of the existing N2 will not result in loss of funding of the wording in the New CDP changes to:

"an online upgrade of the N2 extending from north of Ardee to south of the Castleblayney bypass" as shown below from MCC CDP 2019-2025 –

"The N2 is part of the Trans-European transport Network (TEN-T). This is a network which comprises roads, railway lines, inland waterways, inland and maritime ports, airports and rail-road terminals throughout the 28 EU Member States. This characteristic is a key factor for the network's efficient, safe and secure operation, using seamless transport chains for passengers and freight.

The N2 is categorised as being part of the "comprehensive network": a multi-modal network of relatively high density which provides all European regions (including peripheral regions) with an accessibility that supports their further economic, social and territorial development as well as the mobility of their citizens. The TII have committed to providing additional funding for an online upgrade of the N2 extending from north of Ardee to south of the Castleblayney bypass and this project is at preliminary stages. This will be a joint project between Monaghan County Council and Louth County Council." Page 146 Monaghan County Development Plan 2019-25

Chief Executive's Response:

The preferred route corridor for the N2 Ardee to Castleblayney upgrade was published together with the Option Selection Report in February 2021. This route corridor (Option A Yellow) predominantly follows the existing alignment of the N2.

It is not considered necessary to refer specifically to this route as the policy objective clearly refers to the protection of the selected route.

Chief Executive's Recommendation :

No Change

Submission No.:

LCDP DR172

Submitted By

Christopher O'Rourke

Theme (s):

Chapter 5

Summary of Submission:

Work from home/ businesses should be supported and all restrictions across the County should be lifted, for example: Podiatry, beauty clinics, hair dressing, office pods, art Studios, small local courier service, and physiotherapists etc.

Chief Executive's Response:

The benefits of working from home and working remotely are recognised in the Draft Plan. This is set out in section 5.19 (Co-Working Facilities and Home-Based Activities) of Chapter 5 'Economy and Employment'. Policy Objectives EE 22 and EE 23 support the provision of co-working facilities and home based economic activity.

Chief Executive's Recommendation :

No Change

Submission No:

LCDP DR174

Submitted By

Brady Shipman Martin on behalf of Drogheda Port

Theme (s):

Chapters 2, 5, 7

Summary of Submission:

Support expressed for various elements of the Draft Louth CDP 2021-2027.

Amendments to the following Policy Objectives are requested:

Chapter 2

- SS12
To recognise the importance of the Port Access Northern Cross Route (PANCR) as a critical piece of enabling infrastructure in the strategic growth of Drogheda and to seek to secure funding to progress the delivery of this project as a priority during the life of the Plan.

Chapter 5

- EE34
To recognise that the Port facility at Drogheda is an important economic resource and to support any improvements or expansion to the Port facilities subject to the preparation of a Master Plan and compliance with relevant planning and environmental criteria, subject to appropriate environmental considerations.
- EE35
(ii) The lands and foreshore adjacent Tom Roes Point.
- EE36
To support the delivery of the Port Access Northern Cross Route which will release strategically located lands for economic development and employment related uses, particularly adjacent to Drogheda Port where the opportunity for port-centric employment will be facilitated.

Chapter 7

- MOV 43
To support the progression of the Drogheda Port Access Northern Cross Route and to continue to engage with stakeholders and Government and local landowners in securing the funding to deliver the project, within the life of the plan.

Chief Executive's Response:

Proposed amendment to Policy Objective SS12

There would be no objections to strengthening the text in this policy objective as the PANCR is a critical piece of infrastructure in the future development of Drogheda that will assist in ensuring the town can fulfil its potential as a Regional Growth Centre.

Chapter 5 Economy and Employment

Policy Objective EE34

It is not considered that the additional text is required in this policy objective as the policy objective states that any improvements to the Port would be required to be in compliance with the relevant environmental criteria.

Policy Objective EE35

There would be no objections to amending the text relating to the land adjacent to Tom Roes Point. Any development to the foreshore would require a different consent process therefore it is not recommended to make include the reference to the foreshore in this policy objective.

Policy Objective EE36

This is a broad policy objective that highlights the importance of the PANCR is facilitating and supporting economic development in Drogheda. The economic profile of Drogheda in section 5.12 highlights the importance of the PANCR to Drogheda Port. It is not considered necessary to include the additional text as proposed. It is noted that there is part of Drogheda Port (Tom Roes Point) located outside the development boundary of Drogheda. Given the established use of these lands as a port facility it is considered that the boundary should be extended to include these lands and these lands are zoned for E1 'General Employment' uses.

Chapter 7 policy objective MOV43

The Council acknowledges the requirement for wider government funding to deliver the PANCR however also recognises the importance of engagement with local landowners in delivering this project. It is therefore considered that that the wording of this policy objective should not be changed.

Chief Executive's Recommendation:

Policy Objective SS12

Amend the wording as follows:

"To recognise the importance of the Port Access Northern Cross Route (PANCR) as a critical piece of enabling infrastructure in the strategic growth of Drogheda **and to seek to secure funding to progress the delivery of this project as a priority during the life of the Plan.**"

Policy Objective EE34 - No Change

Policy Objective EE35

Amend the wording as follows:

To support the development of employment lands in the town including:

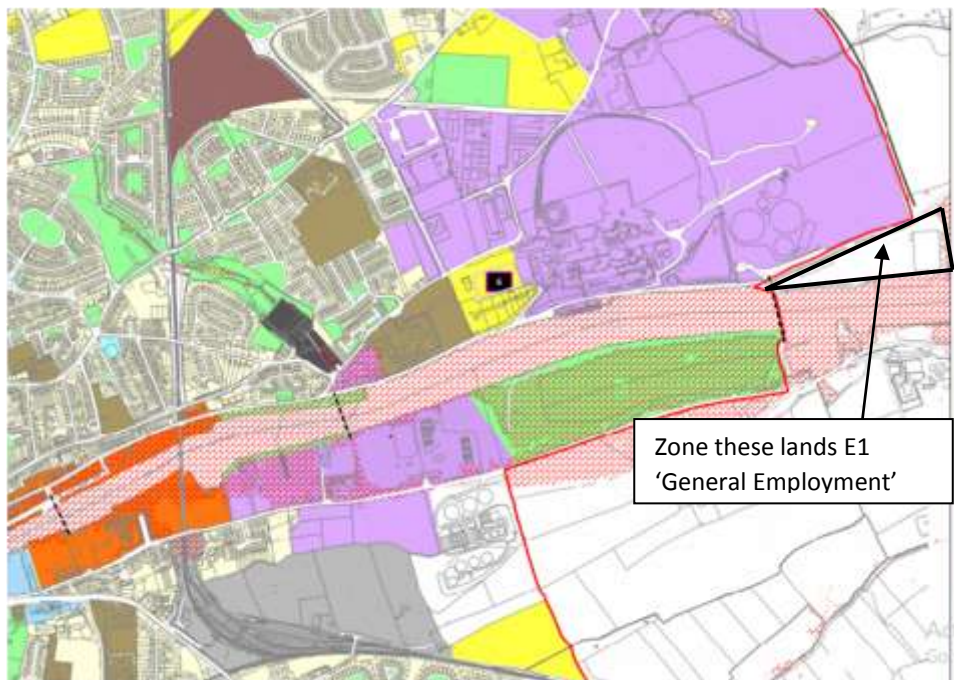
- i) The lands in the northern part of the town adjacent to the M1 Retail Park
- ii) ~~The lands opposite Tom Roes Point ferry terminal~~

ii) The land adjacent to Tom Roes Point

The development of these lands shall be for economic investment and employment generating uses. No development shall take place in the absence of a Master Plan being agreed in writing with the Planning Authority.

Policy Objective EE36 - No Change.

Amend the development boundary of Drogheda to include Drogheda Port and to zone the lands identified below as E1 'General Employment'.



Update the list of 'Generally Permitted' uses in section 13.19.16 for 'E1 General Employment' lands to include 'Port related uses'.

Generally Permitted Use

Builders Provider/Yard, Business Enterprise Centre, Childcare Facility, Digital Innovation Hub/Co-working Space, Education Facility (Third Level or Training Centre), E- Charging Facility, Energy Installation, Food Processing Facility, High Technology Manufacturing, Hotel/Hostel/Aparthotel, Industry Light, Industry General, Logistics, Offices, Park and Ride Facilities, **Port related uses**, Research and Development, Road Transport Depot, Science and Technology Based Enterprise, Utilities, Vehicle Sales Outlet, Wholesale Warehousing/ Cash and Carry, Warehousing (General).

Policy Objective MOV 43 - No Change

Submission No.:	LCDP DR177
Submitted By	Kimmit Sayers on behalf of Termonfeckin Development Board (TDB)
Theme (s):	Volume 2

Summary of Submission:

Submission requests the following:

- Provision of a Cyclepath linking Termonfeckin Village to North Drogheda.
- Development of a structured Heritage Trail within the environs of the village boundary.
- Provision of a playground facility.

In Support:

Cycleway: Population statistics for Termonfeckin provided, a significant proportion of the population are persons with young children or in the retirement age cohort. Furthermore, the village is popular destination for tourists. To improve connectivity between the village and Drogheda a two way cycle path should be provided, benefits of which include:

Reduction in car journeys, improved physical and mental wellbeing, tourism and recreation link, access to local sporting activities and access to schools.

Heritage Trail: Termonfeckin and hinterland has a rich historical heritage: Zone of archaeological protection, 40no. archaeological features and 11no. protected structures. The village is also located with broader Boyne Valley Heritage area. The trail will provide greater public awareness, increase local education and initiate cross – generational interaction.

Playground: Population statistics are provided, whereby 30% are children. There is no playground available for children or tourists. Nearest are located in Clogherhead or Drogheda which require a car journey.

The TDB has begun to examine a range of options for provision of this facility and is ready to work with funding bodies and state agencies to further this proposal. While the need for a playground is referenced in the current draft plan, it is considered that provision of a village playground should be explicitly recognised.

Chief Executive's Response:

Greenway/Cycle path from Termonfeckin to North Drogheda

The Draft Plan recognises the necessity to reduce dependence on the private car for travel and to promote more sustainable modes of transport. The benefits this can have in reducing carbon emissions and promoting a healthy lifestyle are also highlighted. Policy Objective TER 13 supports the development of walkways and cycleways at appropriate locations in Termonfeckin. The Council will continue to engage with the National Transport Authority and local communities and stakeholders in identifying and progressing walking and cycling infrastructure in the County.

Development of a Heritage Trail in the Town

The Written Statement for Termonfeckin in Volume 2 of the Draft Plan identifies the contribution that the built and natural heritage of the town makes to its attractive setting. Investment in buildings and infrastructure that will make settlements such as Termonfeckin an attractive place to live and visit is supported. Policy objective TER 25 supports the progression of any projects for which funding is received that would improve and revitalise Termonfeckin.

Playground

The Draft Plan recognises the importance of social and community facilities in creating a sustainable community. Policy Objective TER 10 in the written statement for Termonfeckin supports the provision of a play park in the town.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR179
Submitted By	Eunan White
Theme (s):	Chapter 7

Summary of Submission:

Submission requests :

All sections of roads which are situated within the designated Village areas should have a speed limit of maximum 50kph.

In Support:

At present, sections of the roads within some designated village areas have an 80kph limit and in terms of safety and consistency it should be reduced as soon as possible. The default special speed limit of 50kph should apply along all roads within designated settlement areas in recognition of the higher density of vulnerable road users and increased traffic movements, particularly turning movements and higher concentration of entrances.

Chief Executive's Response:

The designation of speed limits is a separate statutory process outside the Development Plan.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR202
Submitted By	SLR Consulting Ireland on behalf of Roadstone
Theme (s):	Chapter 2, 5, 11 & 13, Additional Map
Summary of Submission:	

National and Regional Policy Context

Detailed analysis of National and Regional policy has been undertaken NPO 23 of the NPF and RPO 6.7 are specifically mentioned.

Importance of Extractive Industry outlined.

Planning authority is requested to consider 'Essential Aggregates – Providing for Ireland's Needs to 2040' (copied attached to submission).

The objective of this document is to highlight to Government the need for a national planning policy for aggregates to ensure sustainable supply of aggregates for Project Ireland 2040 and beyond. It highlights three important points that statutory planning policy needs to address at all spatial scales. These are: 1. Importance of Extractive Industries and Aggregates 2. Identifying and Protecting Reserves and enabling extraction of aggregates.

Draft Louth County Development Plan 2021-2027

A detailed analysis of the draft Louth CDP 2021-2027 has been undertaken. The following were considered relevant to submission: Policy objective CS1 and ENV 40 - 45 as well as Sections 11.4.2 and 13.51.1.

Submission Comments:

Chapter 2 Core Strategy and Settlement Strategy – the extractive industry should be considered crucial to unlocking the county's potential

Population projections provided, the extractive industry provides the necessary raw materials for the majority of building and infrastructure development in Ireland. Due regard should be given to the fact that the county has significant but finite mineral resources. There is a need to safeguard valuable un-worked deposits from permanent development that would prevent or hinder their future extraction and thus appropriate control measures should be put in place to avoid such a scenario.

Chapter 5 Economy and Employment – inadequate coverage of the potential positive contributions of the extractive industry.

Requested that the Draft CDP be revised to adequately outline the economic value and significance of the aggregates sector, emphasising the sectors significance in terms of economic development and employment. The importance of the sector as well as its significance with regard to construction and development supply chains and the county's growth objectives should be made clear.

Section 13.15.1 Extractive Industry – development management policy assessed

Support for policy objectives and Section 13.15.1. It also welcomed that the point is made that non extractive industry related development may be restricted in areas that are in close proximity to existing extractive sites of significant resource potential, where such developments would limit future exploitation or in areas containing proven mineral (aggregate) deposits in order to prevent the unnecessary sterilisation of these deposits.

Further Significant Considerations

There is potential to strengthen policy provisions in relation to identifying and protecting aggregate reserves in the county. Under other planning systems (including England and Wales), this is standard practice and is referred to as the ‘safeguarding of reserves’

It is appreciated that as per the Draft CDP, the Council intends to put such measures in place, however, this guidance also states that the relevant planning authorities should adopt a systematic approach for safeguarding mineral resources, which include the following principles:

- Uses the best available information on the location of all mineral (aggregate) resources in the authority area. For example, this may include use of Geological Survey of Ireland (GSI) mapping as well as industry sources;
- Consults with the extractive industry, local communities and other relevant interests to define Minerals Safeguarding Areas;
- Sets out Minerals Safeguarding Areas on the policies map that accompanies the county or local development plans; and
- •Adopts clear development management policies which set out how proposals for non-minerals development in Minerals Safeguarding Areas will be handled, and what action applicants for development should take to address the risk of losing the ability to extract the resource. This may include policies that encourage the prior extraction of minerals, where practicable, if it is necessary for non-mineral development to take place in Minerals Safeguarding Areas and to prevent the unnecessary sterilisation of minerals.
- In accordance with the above approach, Roadstone Ltd. would suggest that the CDP highlights areas containing proven deposits on an appropriate map, in order to protect them from the future development of incompatible land use.

Chief Executive’s Response:

The Draft Plan acknowledges the need for extractive industries in terms of supply of aggregate materials for the construction sector, particularly with regard to the delivery of the Core Strategy and Settlement Strategy. The Draft Plan also acknowledges that a satisfactory balance is required between the needs of the building industry and the need to protect the environment.

The GSI Aggregate Potential Mapping has been used in the preparation of the Plan to illustrate potential deposits. The areas of high to very high potential for crushed rock deposits are generally focused on the Cooley peninsula, however, an area from Collon to Clogherhead is also identified as having high potential. It is not considered necessary to highlight these specific areas on a map within the Plan. ENV 42 is noted in this regard. This policy objective seeks to prevent development that would hinder the efficient or effective recovery of the County’s aggregate resources.

Applications for mineral extraction will, therefore, be considered on their merits in terms of potential for impacts on the environment and the proper planning and sustainable development of the area and having regard to Section 13.15.1.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR230
Submitted By	Genesis Planning consultant on behalf of Tony Meegan
Theme (s):	General - Wording
Map showing lands subject to Submission:	N/A

Summary of Submission:

Section 5.19.3 of the Draft LCDP 2021-2027 states that 'rural businesses and enterprises are an important source of local employment in the County', and that 'in relation to the expansion of an existing rural enterprise, consideration will be given to the scale of the existing and proposed development, the capacity of local infrastructure to accommodate the expansion, and the compatibility of the development with the surrounding area.' With regard to Drumbilla we request that policy provision is made for supporting re-development of established brownfield lands/business premises in rural areas.

EE58 and EE59 presently read:

- EE 58: To continue to support the agricultural sector and to facilitate the development of environmentally sustainable agricultural activities.
- EE 59: To facilitate the diversification of the agricultural sector by supporting alternative farm enterprises subject to the nature and use of any enterprise being compatible with the environment in which it is located.

It is requested that they are amended to read:

- EE 58: To continue to support the development of the rural based business sector and to facilitate the development, re-development, diversification and growth of brownfield lands in rural areas for industrial and economic development.
- EE 59: To facilitate the diversification of the rural based business sector subject to the nature and use of any enterprise being compatible with the environment in which it is located.

This would be consistent with national and regional policy.

Chief Executive's Response:

The Draft Plan, in line with national policy supports the diversification of the wider rural economy, subject to diversification projects and enterprises being appropriate for a rural location. This is set out in section 5.19.3 'Rural Enterprises'. This section of the Plan also recognises the value of rural businesses and enterprises to the wider rural economy. Policy objectives EE 58 and EE 59 are specific to the diversification of agriculture.

Policy objective EE 53 is a broad policy objective that would support any appropriately scaled rural enterprise development. It is considered that any proposed redevelopment of an appropriately scaled rural enterprise or a rural enterprise project appropriate to a rural location could be supported under this policy objective.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR245
Submitted By	Louth Tidy Towns Together
Theme (s):	Chapter 13

Summary of Submission:

The following is requested:

- **Derelict Sites:** There should be standardised high quality screening for derelict sites and derelict properties. The primary objective is for Health and Safety reason but aesthetics should also be taken into consideration
- **Unoccupied Properties:** Plan should include provision to enable the local authority to compel owners of unoccupied (as distinct from derelict) properties and sites to ensure that these properties are maintained to a reasonable level of external presentation.
- **Commercial Signage:** Specify that commercial signage that would be of high quality and traditional design, and that plastic and neon signage should be prohibited in the Plan as per the draft Mayo County Development Plan.
- **Landscaping for Residential Developments:** Landscaping Plans for residential developments should place an emphasis on native Irish trees and low maintenance pollinator friendly perennial.

Chief Executive's Response:

Screening around Derelict Sites and Properties

Whilst the merits of having a standardised screening around derelict sites and properties are acknowledged the process of registering and serve notices relating to derelict sites is separate to the Development Plan process in that Derelict Sites come under the Derelict Sites Act. Any notices served under the Derelict Sites Act are required to include the measures necessary to prevent the land from becoming or continuing to be a derelict site. Any issues regarding screening can be appropriately addressed under this notice.

Unoccupied properties

There is no legislative provision under the Planning and Development Act 2000 (as amended) to enforce land owners to maintain their property to a reasonable level of presentation.

Commercial Signage

Sections 13.12.8 and 13.12.9 of the Draft Plan provides guidance in relation to shop fronts and signage. In addition the Council has published 'Shopfront Design Guidelines' which recognise the importance of shopfronts and signage in determining the character and quality of the street scene. This guidance indicates that box signs and internally illuminated signs are unacceptable. Any lighting associated with signage should be discreet.

Landscaping

Section 13.9.12 of the Development Management Guidelines provides guidance on landscaping in residential developments. Additional text could be inserted indicating that any planting shall consist of native species (trees, hedgerow, shrubs, and wildflowers) and that such planting will provide food for pollinators.

Chief Executive's Recommendation :

Chapter 13

Insert the following additional text into section 13.9.12 'Landscaping' and 13.11.7 'Landscaping and Boundary Treatments'

Any planting shall consist of native species (trees, hedgerow, shrubs, and wildflowers), and low maintenance pollinator friendly perennials.

Submission No.:	LCDP DR247
Submitted By	Collon Community Together
Theme (s):	Volume 2 Collon, Chapter 7, Chapter 13

Summary of Submission:

Road Safety

- Car parking for the school to be included as an objective in the Development Plan.
- Road safety improvements on the N2 be given priority, as such Policy Objective Col 16 be amended to read:

"To carry out traffic calming measures on the N2 at Collon as part of an overall traffic management strategy aimed at prioritising pedestrians and cyclists".

- Chapter 7 "Movement" of the Draft Development Plan makes no mention of improvements to road safety in Collon, it would be the last unbypassed village on the N2 National Route. Policy Objective MOV 41 should be amended to read:

"To seek to examine, in consultation with Transport Infrastructure Ireland, the feasibility of progressing and delivering the N2 bypass of Ardee Town and Collon."

Economic Development

- Policy Objectives Col 4 and 5 of the draft Louth CDP 2021-2027 are welcomed, however Col 4 of the current plan to promote the village centre environment has not come to fruition.
- Several of the protected structures are derelict; preservation of same should be a priority.

- Policy Objective Col 6 is noted. The importance of local employment opportunities is acknowledged, however there is an existing underutilised business park to the South of the village on the N2. Urge that priority is given to its utilisation.

Public Realm

- The Draft County Development Plan incorrectly states that Collon has a community centre. Collon has a village hall which is seldom in use due to infrastructural issues. Collon Community Together looks forward to working with the Council on the upgrading of the village hall to enable it to work as a fully-fledged community centre in line with Policy Objective Col 10. The project's inclusion in Table 7.1 is welcome.
- Objective Col 11 is welcomed; the village is in dire need of a playground. Collon Community Together are actively working towards this goal. We request that Objective Col 11 read:
"To support the progression and delivery of social and community projects including the identification of a suitable site and construction of a play park."

Tourism and Recreation

- Objectives Col 7, 8, 13 and 14 are welcomed. Development of such amenities should have regard to road safety issues.

Biodiversity and Natural Heritage.

- Collon has a high number of mature trees, integral to its character and scenic amenity and the importance of such trees is highlighted. Objective Col 20 is welcomed. However no TPO's have been granted on previously identified trees and no individual candidate tree preservation orders appear on the Draft Development Plan Composite Map, or on the SEA environmental report. Clarity is required.
- Woodlands of New Mellifont Abbey are identified as a proposed Natural Heritage Area, these mature and valuable woodlands are unmanaged and extensively overgrown with invasive cherry laurel. Surveying and management of these woodlands should be made a priority. The re-launched Tidy Towns Committee may be able to assist with same.

Chief Executive's Response:

Road Safety

The Council will continue to engage with Collon National School in addressing any issues of congestion. A multi-dimensional approach can be taken to address this issue including the promotion of alternative modes of transport to the private car, where feasible, to more sustainable modes of transport including walking, cycling, and car sharing. This, in addition to implementing a Mobility Management Plan may assist in reducing congestion at the school.

The Council will continue to work in partnership with the TII in identifying the requirement for and investment in road safety and traffic calming measures along the N2 in Collon. Table 7.3 in Chapter 7 includes general improvements to the N2 in the list of National Roads Projects. Any Road Safety improvement works would be captured under these 'general improvements'. The progression of these projects is supported under policy objective MOV 39, therefore an additional policy objective relating to same is not considered necessary.

Any proposal for a bypass of Collon would require funding from central government and in order to secure this funding the project would need to be included in the list of infrastructure projects to be progressed under Project Ireland 2040. There are currently no proposals for a bypass of Collon. The inclusion of a policy objective in the Draft Plan referring to a bypass of the village would be inconsistent with national and regional policy.

Economic Development

In relation to the Protected Structures in the village that are in poor condition, the Plan will support the appropriate refurbishment and re-use of such buildings.

This Plan will support and facilitate economic investment and employment generating development within the village and will prioritise the lands zoned 'General Employment' for such uses.

Public Realm

Table 8.1 indicates there is a 'Community Hall' in Collon. This is considered to be the same as a 'Village Hall' and therefore No Change is required.

The Council would support the construction of a play park subject to the availability of funding. COL 11 could therefore be amended as follows:

"To support the progression and delivery of social and community projects including the identification of a suitable site and construction of a play park, subject to the availability of funding."

Tourism and Recreation

Traffic and pedestrian safety will be a consideration of any additional infrastructure provided in Collon.

Biodiversity and Natural Heritage

Section 8.10.1 'Tree Preservation Orders' in Chapter 8 'Natural Heritage, Green Infrastructure, and Biodiversity' provides details of the existing Tree Preservation Orders in the County. Policy Objective COL 20 will promote the preservation of any trees considered to be of significant value. This will be managed through the Development Management process. On foot of this submission a review of how trees and hedgerows are identified on the maps was undertaken and a more user friendly method of identifying these natural features has been implemented on the corresponding composite maps and policy objective in order to provide clarity for people.

The management of woodlands would not fall under the remit of the Development Plan.

Chief Executive's Recommendation :

Amend the wording of Policy Objective COL 11 as follows:

“To support the progression and delivery of social and community projects including the identification of a suitable site and construction of a play park, **subject to the availability of funding.**”

Amend the wording of the Policy Objective pertaining to all Level 3 and 4 settlements relating to trees and groups of trees as follows:

‘To promote the preservation of **significant** ~~individual trees or groups of trees~~, and **hedgerows** including those identified on the Composite Map and to manage these trees in line with arboricultural best practice’.

On foot of a printing error include trees omitted from Composite Maps (and corresponding legend) on Level 3s and 4s.

Submission No.:	LCDP DR255
Submitted By	Declan Brassil and Company Limited on behalf of Genus Homes
Theme (s):	Volume 1 Chapter 2

Summary of Submission:

The submission requests the following amendment of Section 2.13.6 ‘Northern Environs of Drogheda’

(*Proposed Amendments in Bold, proposed deletions in strikethrough):

‘In this regard, there will be a requirement for a phased approach to be taken to the development of the northern environs. Pending adoption of the LAP, the release of zoned residential land will be informed by the phasing arrangements set out in the 2006 Master Plan (which can be viewed at the attached link) and the pattern of development established by the on-going implementation of extant permissions ~~or any subsequent Masterplan for the area.~~’

‘The development of these lands is closely linked to the provision of roads, new streetscapes, pedestrian and cycle networks and waster services infrastructure which will allow the Council to manage the phased release of the lands. The LAP will incorporate relevant provisions relating to phasing having regard to these considerations, and these phasing provisions will replace those set out in the 2006 Master Plan.

In Support:

Genus homes are currently implementing a planning permission for 205 residential units at Ballymakenny Road in the North Drogheda Environs. Some 68 units are currently under construction, various planning references provided.

As per the LAP Guidelines (2013) the LAP is the appropriate statutory land use plan to guide development and the phased release of the northern environs lands, with emphasis on sequential development and phasing.

As per The Development Plan Guidelines (2007) sequential approach to zoning must have regard to infill opportunities and the better use of underutilised land as well as zoning areas contiguous to existing zoned development lands

These principles are relevant and appropriate to the northern environs landbank. The Draft Plan acknowledges that the northern environs zoned landbank is 'a fundamental part of the long term growth strategy for the town that will be developed over a number of development plans'.

National guidance establishes that the phasing of the northern environs landbank should be provided for in the LAP, and that the sequential approach to the phased release of zoned land must have regard to the established pattern of development.

A number of extant permissions are being implemented in the northern environs area. These ongoing developments will establish a pattern of development that must inform the sequential phasing and release of lands in the LAP over the period of the LAP and subsequent plans. The phasing indicated in the 2006 Master Plan has been rendered obsolete by the pattern of development established and by the implementation of extant permissions.

The established and establishing pattern of development has created infill and consolidation sites that may be more suitable for release for development than the phasing indicated in the 2006 Master Plan, which has now been overtaken by events.

The determination of any applications for new development on the northern environs lands should be guided by the phasing provisions of the 2006 Masterplan and the established pattern of development in the area.

The preparation of the LAP will establish an appropriate phasing strategy.

Chief Executive's Response:

It is important that the build out of these lands are appropriately managed, particularly when consideration is given to the extent of lands zoned for residential development in the area and the associated number of extant permissions on these lands. In this regard the phasing strategy as set out in the Master Plan provides a strong framework for which to manage development in the area pending a detailed analysis and updated phasing strategy which will be prepared as part of the Joint Local Area Plan for Drogheda.

Taking this into account it is considered that the text in section 2.13.6 should be rephrased to indicate that the build out of lands in the Northern Environs of Drogheda shall be informed by the phasing arrangements set out in the 2006 Master Plan, pending the preparation of the Local Area Plan.

In line with national and regional policy there will be an emphasis placed on achieving consolidation between the areas under construction and the existing built up area of Drogheda rather than the continuation of a dispersed pattern of development in the area. Any future phasing shall also take into consideration the status of the PANCR project.

Chief Executive's Recommendation :

Amend paragraph 3 of section 2.13.6 as follows:

In this regard there will be a requirement for a phased approach to be taken to the development of the Northern Environs. **This shall be informed by** the phasing arrangements set out in the 2006 Master Plan (which can be viewed by clicking on this link) or any subsequent Master Plan prepared for the area. **In addition an emphasis shall also be placed on consolidation between areas developed or under construction and the existing built up area of Drogheda rather than a continuation of a dispersed pattern of development in the Northern Environs area.**

Submission No.:	LCDP DR259
Submitted By	Brian Fox on behalf of Lis na Dara Residents Association
Theme (s):	Chapter 4, Chapter 7

Summary of Submission:

Road Infrastructure

- Details of road improvement and maintenance projects for consideration during the lifetime of the plan are set out in Section 7.7.4 and Table 7.2.
- Concern regarding volume of traffic and safety of residents as a result of the Mount Avenue Road Upgrade which includes the estate of Lis na Dara.
- The proposed road through Lis na Dara was never intended to be a primary link road between the Carrickmacross Rd and Castleblayney Rd, for any length of time.
- The strategic road project, (Section 7.8 Table 7.3) the link road from R934 Castleblayney Rd to R178 Carrickmacross Rd should be sequenced to be in place prior to the development of the Mount Avenue Road upgrade.
- Proposed works contradict Policy Objectives MOV 5, MOV 10, MOV 24, MOV 36 and HOU 9.

Social and Community

- Welcome Policy Objectives SC16, SC17 and SC18, however the same support should be provided for housing developments exceeding 100 residential units or more.

Chief Executive's Response:

The phasing and development of the lands in the Mount Avenue Area will be subject to the preparation of a Master Plan. As part of this Master Plan there will be a requirement for any necessary roads and water services infrastructure to be delivered in tandem with residential development. This will ensure the necessary infrastructure will be in place to facilitate the additional population and associated traffic movements in the area.

Traffic and pedestrian safety will be a key element of the design of the link roads, which will be designed in accordance with the Design Manual for Urban Roads and Streets (2019).

Taking account of the fact that the proposed Link Roads in Dundalk are necessary to facilitate the planned growth of the town it is considered that they are an essential piece of infrastructure in enabling Dundalk to fulfil its potential as a Regional Growth Centre and creating a compact and sustainable community.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR264
Submitted By	On behalf of Age Friendly Alliance Louth Older People's Forum Louth EU_SHAFE Local Action Group Louth
Theme (s):	General, Chapters 1, 2, 3 ,4 , 5 and 13 Housing Strategy

Summary of Submission:

Background to Age Friendly Programme provided. The recommended changes are highlighted in bold:

General

- All instances of the word "elderly" should be replaced with "older persons"
- Where the phrase "older people" (e.g. "Housing for Older People") is used this should be replaced with "older persons"

Chapter 1 Strategic Objective 9

- Protect and enhance the unique character and identity of Louth's towns and villages and improve quality of life and well-being through the application of Healthy Placemaking, underpinned by good urban design with the creation of attractive public spaces that are age friendly, vibrant, distinctive, safe and accessible and which promote and facilitate positive social interaction.

Chapter 2-Core and Settlement Strategy

Section 2.14.5 Residential Development

- Residential development will focus on the delivery of high quality designed buildings and spaces that can meet the housing needs of all members of the community regardless of age or ability and provide connectivity and permeability between existing and future neighbourhood areas. In order to achieve compact growth, higher density developments will be required, particularly on centrally located lands or lands well connected to the town centre. (Dundalk).

Chapter 3 – Housing

Policy Objective HOU 10

- To continue to support the creation of sustainable communities throughout the County for people across all the life stages by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where walking, cycling, and public transport is prioritised.

Policy Objective HOU 26

- To require the provision of an appropriate mix of lifetime adaptable house types and sizes in residential developments throughout the County that would meet the needs of the population and support the creation of balanced and inclusive communities

Section 3.8 Housing for Older People

- As part of the strategy of consolidation and compact growth, there will be opportunities for the redevelopment of infill and brownfield land in central areas of towns and villages. Such lands will be prioritised for accommodation for older persons.

Policy Objective HOU 27

- To require the provision of single floor properties in residential developments in excess of 100 units at a rate of at least 5% single floor units per 100 residential units unless it can be demonstrated by evidence based research carried out by an appropriately qualified professional that there is no demand for this type of accommodation.

Policy Objective HOU29

- In line with Action 4.6 of the policy document 'Housing Options for our Ageing Population' the following is requested:
To seek that all new residential developments in excess of 20 residential units provide for a minimum of 30% universally designed units in accordance with the requirements of 'Building for Everyone: A Universal Design' published by the Centre for Excellence in Universal Design

Chapter 4- Social Community

Policy Objective SC8

- To support the planning provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities and all ages have access to a range of facilities that meet the needs of the communities they serve, are physically integrated with residential and employment areas and are provided concurrently with new residential development.

Chapter 5 Economy and Employment

Section 5.13.5 Creating an Attractive Public Realm.

- As part of the strategy of creating an attractive environment for people to live and work, the Council is in the process of implementing a Public Realm improvement project in the centre of the town.

This includes age friendly improvements to the streetscape, replacement of street furniture and landscaping, with the objective to improve access for people in the town centre whilst also retaining ease of access for buses, cyclists, and cars.

Section 5.24 Town Centre First Approach

- The Council will seek to ensure that town centres become more attractive and greener environments, that are age friendly, easily accessible, legible and which give people confidence to visit and live in the centres.

Housing Strategy

Section 6.1 Housing Strategy Objectives

'Housing Options for our Ageing Population' be referenced.

Housing Strategy , Annex 3:

- "Housing Options for our Ageing Population'

Chapter 13 – Development Management Guidelines

Section 13.9 Housing

- *13.9.1 Guidance Documents for housing developments in Urban Areas*

'Housing Options for our Ageing Population'.

13.9.13 Dwelling design, size and mix

- Residential units in excess of 100 units will be required to provide at least five single floor units for every 100 residential units unless it can be demonstrated by an appropriately qualified professional that there is no demand for this type of accommodation.

Design Standards for new apartments

- Private amenity space shall primarily be accessible from the main living area in the form of balconies/terraces. Covered balconies or "Winter Gardens" shall be considered for apartments for older persons.

Chief Executive's Response:

General:

In line with the submission it is recommended that in all instances where the word "elderly" occurs that this is replaced with 'older persons' and likewise where 'older people' occurs that this is replaced with 'older persons'

Replace in all instances wording as follows:

'~~elderly~~' and '~~older people~~' with 'older persons'

Chapter 1:

The inclusion of the additional wording as proposed is in accordance with principles of the Draft Plan.

Chapter 2:

The additional wording to the narrative as it relates to Dundalk is in line with the principles and policy objectives of the Draft Plan. It is recommended that this additional wording be included.

Chapter 3:

HOU 10 – There would be no objections to the inclusion of the additional wording as proposed.

HOU 26 – There is a strong policy framework and narrative in Chapter 3 supporting the provision of adaptable and universally designed homes. The additional text in HOU 26 is not considered necessary.

Section 3.8 – In each settlement the quantum of infill and brownfield land varies, as does the demand for housing for older people. In addition not all infill and brownfield lands would suitably lend themselves for development for older people. In this regard it would not be prudent to prioritise all infill and brownfield lands for housing for older people. This will be positively supported in the appropriate locations subject to the relevant planning considerations.

HOU 27 – Policy objective HOU 27 is referring specifically to single storey properties therefore No Change is considered necessary.

HOU 29 – In line with Action 4.6 of the policy document ‘Housing Options for our Ageing Population’ there would be no objections seeking that the number of universally designed units in residential developments in excess of 20 units is a minimum of 30% of the total units.

Chapter 4

The request for the inclusion and recognition of ‘all ages’ in relation to the provision of community/recreational etc. facilities is in accordance with supporting age friendly initiatives and with the policy objectives and principles of the Draft Plan. It is therefore recommended that the additional wording be included in SC 8

Chapter 5

Section 5.13.5 – Public realm improvement works have to take into account a broad range of design parameters to comply with the building regulations. Age Friendly considerations would also be taken into account. It is not considered necessary to specifically reference age friendly requirements.

Section 5.24 – The Draft Plan supports any works or improvements that would make town centres more age friendly. In this regard there would be no objections to including the additional text as proposed.

Housing Strategy

A reference to the policy document ‘Housing Options for our Ageing Population’ can be made in the Housing Strategy.

Chapter 13

Guidance documents – Chapter 13 provides guidelines and standards for designing developments. The document ‘Housing Options for our Ageing Population’ is a policy document. Any planning application must take account of the policy objectives and narrative within the relevant chapters and associated appendices/volumes in the Plan.

It is not considered necessary to reference this document in Chapter 13 as it is specifically referenced in Chapter 3.

Section 13.9.13 – This refers specifically to single storey properties therefore No Change is considered necessary.

Section 13.9.27 – Where feasible there would be no objections to supporting provision for covered balconies or “Winter Gardens” for apartments for older persons.

Chief Executive’s Recommendation :

General

Replace in all instances wording as follows:

~~‘elderly’~~ and ~~‘elder people’~~ with **‘older persons’**

Chapter 1

It is recommended that additional wording be included in policy objective SO9 as follows:

Protect and enhance the unique character and identity of Louth’s towns and villages and improve quality of life and well-being through the application of Healthy Placemaking, underpinned by good urban design with the creation of attractive public spaces that are **age friendly**, vibrant, distinctive, safe and accessible and which promote and facilitate positive social interaction.

Chapter 2

Section 2.14.5 additional wording:

Residential development will focus on the delivery of high quality designed buildings and spaces that can meet the housing needs of all members of the community **regardless of age or ability** and provide connectivity and permeability between existing and future neighbourhood areas.

Chapter 3

HOU 10 insert the following additional wording:

To continue to support the creation of sustainable communities throughout the County **for people across all the life stages** by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where walking, cycling, and public transport is prioritised.

HOU 26 – No Change

Section 3.8 – No Change

HOU27 – No Change

HOU 29 insert the following additional wording:

To seek that all new residential developments in excess of 20 residential units provide for a minimum of ~~5%~~ **30%** universally designed units in accordance with the requirements of ‘Building for Everyone: A Universal Design’ published by the Centre for Excellence in Universal Design

Chapter 4

It is therefore recommended that the additional wording be included in SC 8 as follows:

To support the planning provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities **and all ages** have access to a range of facilities that meet the needs of the communities they serve, are physically integrated with residential and employment areas and are provided concurrently with new residential development.

Chapter 5

Section 5.13.5 – No Change

Section 5.24 insert the following additional text:

The Council will seek to ensure that town centres become more attractive and greener environments, that are **age friendly**, easily accessible, legible and which give people confidence to visit **and live in** the centres.

Housing Strategy

Include a reference to the policy document ‘Housing Options for our Ageing Population’ in section 2.1 National Legislation and Policy as follows:

Housing Options for Our Ageing Population

A joint policy statement “Housing Options for our Ageing Population” was launched in February 2019. The purpose of the Statement is to provide a policy framework to support our ageing population in a way that will increase the accommodation options available and give meaningful choice in how and where people choose to live as they age. It identifies a programme of 40 strategic actions to further progress housing options for older people under the themes of data gathering, collaborative working, delivering choice, support services, comfort and safety and maintaining momentum. The statement also sets out the general guiding principles that will underpin the development of housing options for older people as follows: Ageing in place; Supporting urban renewal; Using assistive technology; Staying socially connected; Working together; and Promoting sustainable lifetime housing.

Chapter 13

Reference to ‘Housing Options for our Ageing Population’ – No Change

Section 13.9.13 – No Change

Section 13.9.27 insert the following additional text:

Private amenity space shall primarily be accessible from the main living area in the form of balconies/terraces. **Where feasible covered balconies or “Winter Gardens” shall be considered in apartments for older persons.**

Submission No.:	LCDP DR276
Submitted By	SLR Consulting on Behalf of Belgard Estates
Theme (s):	Chapters 5, 13

Map showing submission lands:



Summary of Submission:

Background to Belgard Estates Ltd: They have 3 no. landholdings in Drogheda Mell, Old Slane Road and Cement Road.

Synopsis of national, regional and local planning policy provided. NPO2b, NPO7 and NPO 44 of the NPF specifically mentioned. In terms of the RSES, RSO 1, RPO4.13, RPO 4.14 and RPO 4.18 are cited. In relation to the draft Louth CDP 2021-2027 the following are highlighted CS6, CS7, CS8, CS9, SS11, EE35 and Chapter 13 in relation to Masterplans.

- **Lands at Mell**

The General Employment (E1) zoning is supported. However the development management policy objectives in relation to master plans are restricting the development of the site and their employment potential. Essentially the development of a single master plan for the whole area is impractical given the number of landowners. If a well considered proposal for a master plan is proposed for a particular land bank, it should not be required to cover the full extent of any zoned land bank.

It is suggested that EE 35 is revised to read:

EE 35 To support the development of employment lands in the town including:

- iii) The lands in the northern part of the town adjacent to the M1 Retail Park
- iv) The lands opposite Tom Roes Point ferry terminal.

The development of these lands shall be for economic investment and employment generating uses. Development shall only take place in areas where a Master Plan has been agreed in writing with the Planning Authority.

In the interest of supporting strategic regional and county objectives, Master Plan proposals for any significant area of employment zoned lands will be duly considered, and such proposals will not necessarily require incorporating the entirety of an employment zoned landbank.

This should also be reflected in Chapter 13, Section 13.5 'Master Plans'.

- Old Slane Road Lands

The Mixed Use (C1) zoning is supported. It is stated that the lands shall provide for commercial, business and residential type uses and that any proposal will maintain existing urban character, be of high quality design, have regard for residential amenity etc...

- Cement Road Lands

The Open Space (H1) zoning is supported.

Chief Executive's Response:

Old Slane Road and Cement Road lands

The support for the Mixed Use zoning on the submitter's lands on the Old Slane Road and the Open Space zoning on their lands on the Cement Road is noted.

Lands at Mell and policy objective EE 35

The purpose of a Master Plan is to provide a vision for the long-term development of a large and strategically located area of land. The Master Plan also provides the platform for a co-ordinated framework for the planning, phasing construction, and infrastructure investment. It is recognised, however that there can be challenges in getting agreement for Master Plans where there are large areas of lands in multiple ownership. Where such agreement cannot be reached between all landowners, it may be decided, in the interests of proper planning and sustainable development, to proceed with the Master Plan. In such circumstances it may be appropriate for the Master Plan to focus on a specific area within a large parcel of lands. If this were to occur, details of future access and infrastructure provision for the areas outside of the Master Plan would have to be provided.

There would be no objections to amending policy objective EE 35 and section 13.5 'Master Plans' in this regard.

Chief Executive's Recommendation :

Amend policy objective EE 35 as follows:

To support the development of employment lands in the town including:

- i) The lands in the northern part of the town adjacent to the M1 Retail Park
- ii) The lands opposite Tom Roes Point ferry terminal.

The development of these lands shall be for economic investment and employment generating uses. ~~No development shall take place in the absence of a Master Plan being agreed in writing with the Planning Authority.~~ Development shall only take place in areas where a Master Plan has been agreed in writing with the Planning Authority in accordance with the requirements set out in section 13.5 'Master Plans' in Chapter 13 'Development Management Guidelines.'

Amend section 13.5 Master Plans by inserting or making the following amendments to the last paragraph as follows:

In the larger settlements of the County, there are large parcels of undeveloped lands zoned for residential and employment uses. A Master Plan will normally be required to be agreed on these land blocks, to ensure there is a framework in place setting out how the area will be developed. This includes access points, internal road layouts, sustainable transport provision, connectivity and permeability with surrounding areas, water services infrastructure, open space provision, and the design and layout of buildings.

The written agreement of all landowners in a Master Plan area is normally required. Where this cannot be achieved consideration may be given to the preparation of a Master Plan in a specific location within the overall land parcel of the Master Plan area. This will only be considered where a clear rationale is provided explaining the reasons why the Master Plan for the entire land parcel cannot be considered. This rationale would have to demonstrate to the Council that this approach would not undermine the development of the wider Master Plan area. This may not be feasible in Master Plan areas where there is multiple land use zoning objectives and the build out of the lands requires the provision of a range infrastructure e.g. social, community, transport, or water services infrastructure in tandem with employment and/or residential development.

Any Master Plan that is specific to a location within the overall land parcel of the Master Plan area shall be required to demonstrate the relationship of the subject lands with the wider lands in the overall Master Plan area and shall clearly set out future access points (vehicular, cycling, and pedestrian), and service and utilities provision and connections in order to ensure a co-ordinated and holistic approach is taken to the future development of the lands.

Landowners or developers shall engage with the Council at the early stage of the design process to determine if a Master Plan is required. The larger Master Plan Areas in the County are outlined in Table 13.1.

Submission No.:	LCDP DR278
Submitted By	Irish Concrete Federation
Theme (s):	Chapters 11, 13
Summary of Submission:	

- Acknowledge Section 11.4.2 and supportive for Policy Objectives ENV 41 and ENV 42
- The role of the industry in the economy of the county is ignored in Chapter 5 it must be referred to Section 5.19.3 under 'rural resource- based enterprises'.
- Given the industry is essential in the delivery of infrastructure (EE30) a more specific acknowledgement in the section or policy objective is warranted.
- Mainstream extractive industry has been working to improve public perception, industry was devastated by recession, it needs appropriate support in the planning process and market demand should be met by legitimate industry. Objectives in the draft Plan regarding carbon reduction are noted. The Irish Concrete federation is engaged with the Environment Protection Agency to establish end of waste criteria for recycled concrete aggregates included use in site works.
- In Section 11.4 the appropriateness of extractive sites for soil recovery as site remediation process would be supportive of ENV 40. Extractive sites will already have the necessary infrastructure to seamlessly deal with soil recovery and certainty of use. Section 13.15.1 of the Development Management Guidelines should seek to encourage soil recovery as part of every extractive development.
- The Quarry Planning Guidelines (2004), the Irish Concrete Federation Code of October 2005, and the guidelines for Environmental Management Sector should be specified in Section 13.15.1 of the Development Management Guidelines.
- Welcome an acknowledgement NPWS Notice Nature Guidance on Biodiversity in the Extractive Industry and GSI's Geological Heritage Guidelines for the Extractive Industry.
- The Irish Concrete Federation has worked closely with the GSI in the area of geological heritage, ENV 46 is welcomed.
- Confident that the extractive industry can work within the general landscape and protection policies of the Plan. There is a severe shortage of sand and gravel in the North East of the country, Louth contains enormous amounts of this resource. The Federation would welcome a commitment in the draft Plan to issue permissions with terms commensurate with the resources available for extraction and would further welcome support for significant extensions to existing professionally managed quarries. It is suggested that a planning permission is constructed whereby the recommendations of the EPA Guidelines (or any revision), are applied to the site on an ongoing basis.
- With regard to transport of aggregates, appropriate contributions to roads should be calculated on the basis of all users. Impact of unauthorised development on roads nationally, is clear. If the planning authority is seeking contributions, it must ensure that legitimate industry is not being unfairly competed against.
- Operators in the North of Ireland do not have restrictions on time, thus they capture the business of morning concrete pours in Dundalk on the basis that local plants can't open until 8.00am generally. This restrictive planning condition is unfair.

- The Port of Drogheda has been the location for marine dredging and landing of aggregates in the past, the potential for landing marine aggregates at Drogheda should be expressly reflected in EE25 and EE34.

Chief Executive's Response:

The role of the extractive industry is specifically dealt with in Chapter 11 and not in Chapter 5 as it is considered that the Extractive Industry sits under the general area of Natural Resources. It is considered that sufficient policy is provided for within Section 11.4.2 and 13.15.1.

With regard to planning permissions, applications will be considered on their merits in terms of potential for impacts on the environment and the proper planning and sustainable development of the area. Regard will also be had for the guidelines laid out in Section 13.15.1. It is not the role of the Development Plan to specify planning conditions that may be attached to permissions but rather to provide a policy context and set out policy objectives which are of relevance when assessing any planning application.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR284
Submitted By	Michelle and Cathal Byrne
Theme (s):	Chapter 13

Summary of Submission:

Request that the development plan change current restrictions to commercial activities in St. Nicolas quarter and specifically support the principle of external beer gardens/smoking area for pubs.

In support:

- Most hospitality businesses are operating with a reduced capacity, extra seating area is required to sustain business, submitter has room for same in their yard.
- Benefits would include attracting /retaining customers, providing additional outdoor facilities and subsequently build resilience
- Need to find balance between protecting residential amenities and the needs of a commercial business,
- Willing to restrict the hours in which this area would be used

Chief Executive's Response:

The Council has been dealing with ad hoc responses to the pandemic during the last year, including temporary outdoor dining facilities. A long term policy approach to outdoor dining can only be addressed in a post pandemic environment.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR288
Submitted By	Padraig McKenny
Theme (s):	Chapter 8

Summary of Submission:

Propose that a Tree Preservation order be placed on all the trees in Ardee Golf Club. During 2020 the management of Ardee Golf Club has cut down a lot of trees, many of which were over 200 years old. This was done despite members of the club voicing their opposition to it. If the Tree Preservation Order was there, then any trees that needed to be cut could be done with consultation with Coillte or Council officials.

Chief Executive's Response:

Section 205 of the Planning and Development Act 2000 (as amended) allows planning authorities to make provision for the preservation of any tree, trees, group of trees or woodlands by way of a Tree Preservation Order (TPO), where it is carried out in the interest of expediency, amenity or the environment. To date, the Council has made 6 TPO's in County Louth.

Three of the six TPO's are located in Ardee. TPO 3 refers to and covers the Golf Course in Ardee and TPO 2 refers to the Fox Covert which lies in its entirety within the boundary of TPO 3.

In conclusion there already exists a Tree Preservation Order for the Ardee Golf Course. The Council will examine the removal of trees as referenced in the submission.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR289
Submitted By	C Murdock, G Marmion and G Duffy
Theme (s):	Appendix 2 Infrastructure Assessment and Land Use Evaluation

Summary of Submission:

Appendix 2 Infrastructure Assessment and Land Use Evaluation
Site 7 and 8 refers to 'Potential New M1 interchange on the Armagh Road'
This is disingenuous as the Armagh Road/ M1 Junction was refused planning permission by An Bord Pleanála (reference 15MS2011).

Refusal reasons provided:

- *It is considered that the provision of a further access by way of retrofitting a junction with a regional road, to primarily accommodate traffic to be generated by proposed local development, would be contrary to the principles of good road design.*
- *the proposal would create a highly undesirable precedent for the provision of junctions on motorways and national routes to facilitate local traffic.*
- *the distance of the regional road to the proposed junction with the M1 and the huge numbers of motorists wanting to get onto the motorway would lead to "weaving of high-speed traffic on the motorway."*

Furthermore ABP noted that the provision of a junction on the Armagh Road (R177) with the M1 would result in a reduction in the level of service for which the motorway was designed and would adversely impact road users and would be seen as a substitute for the provision of an adequate local road infrastructure.

Chief Executive's Response:

Policy Objective SS33 includes a reference to the provision of an interchange on the Armagh Road. This policy objective was inserted by way of a Councillor Motion being passed.

The Infrastructure Assessment and Land Use Evaluation indicated this interchange as being "potential" infrastructure. It was included as it may form part of a planning application for the development of the lands. The provision of an interchange at this location would be beneficial for the development of these lands and wider traffic management in Dundalk.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR295
Submitted By	Elizabeth Kearney on behalf of Dunleer Sustainable Energy Community.
Theme (s):	Chapter 12

Summary of Submission:

- The Climate Action plan 2019 sets a target of increasing the number of Sustainable Energy Communities (SECs) across the country. The Council's Energy Team is strengthening its work with Community Groups seeking to become Sustainable Energy Communities. That should be stated more clearly in the Plan.
- Louth County Council is aligning with the Climate Action Plan 2019, objective of driving action through national dialogue on Climate Change by supporting programmes of education on energy and renewable energy. That needs to be emphasised in the plan to promote that success. Promoting leadership-in-action by the Local Authority is critical to motivating increased community participation.

- The CDP also needs to emphasise the Council's support for the implementation of National and County initiatives for limiting emissions of greenhouse gases by stating its support for accelerating the retrofitting of existing buildings throughout the county. The council is participating with Dunleer SEC to develop such initiatives; this must be promoted to encourage a much higher level of participation in such projects.
- The Renewable Electricity Supply Scheme (RESS) was established to provide support to renewable electricity projects and is a pivotal component of the National Energy Climate plan of delivering its objective of achieving Ireland's 70% renewable electricity target for 2030. One element of the RESS was a facility for Community Led projects and states clearly the role of SECs in this. The CDP should make reference to the promotion and support of the role for communities in the expanding RESS programme.

Chief Executive's Response:

The Draft Plan places significant focus on aligning the policy objectives with those of the Climate Action Plan 2019 (CAP). This underpins Chapter 12 of the Plan. The Draft Plan highlights the role of SEC's, highlighting that the Council was a key partner in the Dundalk 2020 Project, Ireland's first sustainable energy community under SEAI's Sustainable Energy Communities (SEC) Programme. Policy Objective IU 49 is to support Sustainable Energy Communities and Local Community Group Initiatives to develop clean energy opportunities within the County. This is aligned with the CAP 2019 target to increase the number of Sustainable Energy Communities to 1,500.

The Draft Plan set out the policy framework for the future development of the County. As outlined in Section 13.16.2 the retrofitting of existing buildings and the integration of solar infrastructure into the design of new buildings will be generally encouraged. Policy support is also provided for the retrofitting of buildings within IU 73 and IU 76.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR298
Submitted By	Bobby Mc Cormack on behalf of Development Perspectives
Theme (s):	Chapter 3, 4, 5, 6 Chapter on re-using buildings

Summary of Submission:

Submission requests:

- Move to a Sustainable Development model and away from modernism, achieved by integrating the "UN Sustainable Development Goals" (2015- 2030) as a red thread to the new plan.
- Calculate and then create a reduction roadmap for the carbon emissions. Place renewable energy at the heart of the next county development plan.

- Value education as a key way to achieving the vision espoused in the issues paper. This could be done through the provision of high quality education in non-formal learning spaces and by capacity building through training and facilitation. Development needs active citizens and education is an important way of building active citizenship. This new plan should feed into the new Education for Sustainable Development Policy, which the Dept. of Education will be consulting the public on in 2021.
- Comprehensively address inequality and poverty in the county. Lessening income and wealth inequality will have far reaching benefits for the county in terms of educational attainment, health outcomes, crime, increase levels of trust and improve longevity and wellbeing.
- Invest in and prioritise public health on the preventative side of things – try to embrace healthy and active lifestyles.

Overall comments

- Draft plan is adhering to the concept of modernism sustainable development approach is required.

People and places

- Housing need should not be addressed in isolation to services etc. need to build functioning communities at the heart of which is affordable housing.
- Dereliction is a shame, a use it or lose it policy should be incentivised through taxation.

Economic

- Possibility of social enterprise need to be examined in much more detail.
- Louth is too reliant on FDI's and needs to move away from this model. Louth has a distinct geographical advantage over many other locations.
- Tourism, micro energy production and educational provision are areas that Louth could focus on much more.
- As per Goal 12 of the UN's Sustainable Development Goals is "Responsible production and production". Louth County Council should encourage people to buy locally.
- Remote working is something to be embraced, it could have a positive effect for Drogheda.
- Lack of affordable accommodation is hindering efforts to bring people back to the County.

Rural Development and Natural Resources

- The environment is much more than a way of getting an economy to flourish. Economies need to serve communities. The UN Sustainable Development Goals provides a path and policy direction for this to be achieved.
- The model of industrial agriculture needs to change. Too much of the agricultural sector relies on subsidies, which isn't sustainable. Supporting small and local farmers who are engaged in organic farming or permaculture is a better option
- Planting native forests to enhance bio diversity and clean air is a win, win in terms of capturing carbon, encouraging healthy lifestyles and enhancing the natural landscape.

These areas would also be used for honey production, free range poultry farming they would also be an asset for green tourism initiatives and outdoor education.

- Renewable energy needs to be encouraged. Enabling the energy grid for citizens to supply energy through micro generation should be looked at. Dundalk could serve as a test case for the SEAI.
- Organic farming, permaculture and entrepreneurship should be encouraged.
- Rural public transport is required to ensure the continuation of rural communities.

Community, Recreation, Amenity and Social Inclusion

- Louth County Council needs to address inequality including wealth and gender. There are many groups across the county that don't have the same opportunity to participate educationally, politically, socially or culturally in the range of activities that are provided and available. This needs to be addressed.
- Louth needs to build the capacity of the community development and adult and community education practitioners through investment in training, mentoring and support professional staff are required especially in areas of significant disadvantage.
- There needs to be a longer term focus on health and wellbeing, which is Goal 3 of the UN Sustainable Development Goals. This could be encouraged through the provision of quality facilities and education.
- Adult and community education needs to be focused on. There are organisations willing (DP is one) to work with the council to addressing the learning and development needs of the citizens by building social capital.

Chief Executive's Response:

Introduction

This submission referred to a broad range of issues that cannot be dealt with under the development plan. A development plan is a land use plan that seeks to enable and facilitate development. It is required to be in accordance with national and regional policy. A number of issues raised in the submission cannot be dealt with under the development plan. This response will address any issues relevant to the Development Plan.

UN Sustainable Development Goals

The UN Sustainable Development Goals are an integral part of the policy framework on which the Draft Plan has been based. This includes the creation of more sustainable, healthy communities where people can enjoy a balanced lifestyle in addition to reducing our carbon footprint.

Many of the issues raised in the submission have been included in the Draft Plan. This is highlighted as follows:

Housing

The Draft Plan recognises the importance of social and community facilities in creating balanced communities. Policy Objective SC 11 requires a Social Infrastructure Assessment to be carried out for any development in excess of 100 units.

A Housing Strategy prepared which projects the number of affordable housing units required in the County during the life of the Plan.

Economy

The County has a broad employment base. The Council recognises the benefits of FDI to the wider economy in terms of providing supporting jobs and services and therefore does not agree it is too reliant on FDI for employment. The Council will continue working closely with both the FDI and Enterprise Ireland in facilitating investment from both indigenous and foreign businesses.

Chapter 5 section 5.9 supports remote working and recognises its benefits.

Agriculture

Whilst the agriculture industry is facing challenges it must also be recognised that Louth benefits from some of the most productive agricultural lands in the country. This Plan supports any changes to farming practices that will adapt to climate change and provide more sustainable methods of production.

Community, Education and Social Inclusion

The Draft Plan recognises the importance of social inclusion in creating a sustainable community. This is set out in greater detail in the Local Economic and Community Plan (LECP), which includes goals relating to access to education, equality of opportunity, and empowering community innovation. Policy objective SC1 supports the implementation of the LECP.

Climate Change

Climate change is a cross-cutting theme of the Draft Plan. It is recognised we need to reduce our carbon footprint. The Draft Plan includes a range of policy objectives supporting a reduction in greenhouse gas emissions including investment in more sustainable modes of transport, more compact settlements with greater opportunities for walking and cycling, the re-use and adaptation of existing buildings, energy conservation, and greater investment in renewable energy developments.

Conclusion

It is not considered necessary to make any changes to the Draft Plan based on this submission.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR320 & DR339
Submitted By	Turlough Slaney & John Carroll on behalf of Louth IFA
Theme (s):	Chapters 3, 8, 12
Summary of Submission:	

- Rural Policy Zone 1: Proposed zoning and policy has propensity to destroy rural life/communities, furthermore local schools, churches shops will be endangered. Age profile of farmers results in more accidents, family members need to live nearby in case of an emergency. Strongly oppose the 10year qualifying criteria rule.

- Query if urban growth is achievable as it will take some time to bring water infrastructure up to standard.
- IFA Proposal: Improve broadband to facilitate homework, Claghan system would improve communities and encourage work local facilities.
- Former Control Zone 6 (now Policy Zone 1) is overly restrictive, it has led to rural depopulation and adversely impacted upon rural communities. Evidence based approach should be taken on case by case basis.
- The Department of Culture, Heritage and the Gaeltacht has taken the view that a line on a map does not adequately reflect the visibility of a site. Protection of heritage, economic and social sustainability can be complementary.

Chapter 8

- Plan to prevent further spread of Bracken in the Cooley Mountains should be implemented.
- A sustainable recreation plan should be developed in conjunction with stakeholders to prevent further damage to Carlingford Mountain SAC as a result of recreation.
- Council should co-operate with sheep farmers to ensure SAC's are maintained in good condition, infrastructure and assistance should be provided.
- Louth IFA endorse protection of tree and woodlands but it is imperative that the role of farming and rural communities is appreciated and supported.
- Ardee Cutaway Bog is a pNHA, farmers of the bog have been unable to gain financial assistance for farming support schemes yet the route of Ardee Bypass is through the bog, this is a contradiction.

Chapter 12

- On farm renewable energy projects connecting to the grid via local substations should be supported, renewable energy projects should be supported and incentivised by local and national government.
- Financial support is required to enable farmers to decrease use of nitrogen fertiliser and implement low emission slurry spreading.
- Anaerobic Digesters could be used to treat domestic waste, Louth could take leading role, IFA would provide assistance through the National IFA Environment Committee.
- Disappointed that agricultural and rural communities are neglected, it is proposed that the Council form an agricultural committee.
- With regard to the N2 Ardee to Castleblayney Road it is requested that landowners are treated fairly and made aware of developments, request that the Compulsory Purchase Order Goodwill Payment is restored.

Chief Executive's Response:

- With regard to the rural issues raised in the submission please refer to Rural Policy General – Composite Response.
- As part of the preparation of the Draft Plan the Council has liaised and engaged with the various infrastructure providers, including Irish Water. The current Irish Water Investment Plan runs from 2020-2024 and includes a list of projects that seek to address any deficits and provide additional capacity where constraints have been identified.

The Council will continue to work closely with Irish Water in progressing water and wastewater projects to ensure there is capacity in supply and treatment to facilitate the projected growth envisaged during the life of this Plan.

- High speed and reliable broadband underpins economic development and is increasingly recognised as a critical piece of infrastructure which *inter alia* enables more flexible working patterns including working from home. The Draft Plan (IU 32) supports the delivery and implementation of the National Broadband Plan which guarantees rural areas are afforded equal opportunities as urban areas in terms of broadband delivery. Policy Objective IU 33 of the Draft Plan seeks to secure the rollout of high quality broadband and telecommunications infrastructure throughout the County and facilitate its expansion in rural areas in the interest of promoting economic growth and social inclusion. Further the benefits of working from home and working remotely are recognised in the Draft Plan. This is set out in section 5.19 (Co-Working Facilities and Home-Based Activities) of Chapter 5 'Economy and Employment'. Policy Objectives EE 22 and EE 23 support the provision of co-working facilities and home based economic activity.
- The Draft Plan acknowledges that topography can result in buildings and structures being prominent features in the landscape, which may also impact on the character and setting of buildings and sites of national, regional, and local interest. Chapter 13 'Development Management Guidelines' provides guidance regarding the siting and design of buildings in sensitive landscapes.
- Issues relating to the growth and spread of bracken in the Cooley area lies outside the remit of the Development Plan.
- 7 & 8. The Council is committed to conserving and enhancing our natural heritage. In total Louth boasts eleven designated European Sites which form part of the Natura 2000 Network of European Sites including SACs and SPAs which are considered to be of significant importance at European and national levels. Policy Objective IU NBG 3 of the Draft Plan specifically seeks to protect and conserve Special Areas of Conservation and Special Protection Areas designated under the EU Habitats and Birds Directives while Council co-operation with public agencies and community interests to protect regionally significant heritage assets is supported in NBG 7. Further, a Draft Biodiversity Plan for County Louth has been prepared which provides a framework for the conservation and sustainable management of biodiversity and natural heritage at a local level and aims to conserve and enhance the biodiversity of County Louth.
- The support for protection of trees and woodlands and concern regarding the role of farming and rural communities is noted. The Draft Plan fully supports the sustainable development of rural communities.
- Issues relating to financial assistance for farming support scheme are outside the remit of the Development Plan. Regarding the Ardee by-pass, the proposed road has been included in the list of projects to be progressed under Project Ireland 2040. There is also support for the project in regional policy with RPO 8.10 of the RSES supporting the progression of the project. The Draft Plan supports the progression of this project under policy objective MOV 39. It is recognised however that any impacts of the project on the Ardee Bog should be minimised and a balance needs to be achieved in progressing the project whilst also preserving the ecological value and environmental integrity of Ardee Bog.

- The Draft Plan acknowledges the importance of renewable energy projects and to this end, IU 54 specifically supports consideration of small scale wind energy development for auto-consumption purposes, that accord with the proper planning and sustainable development of the area. Further, IU 66 seeks to promote and facilitate the development of small scale electricity generation installations and green technologies subject to certain conditions.
- The role of funding and grants for farmers to decrease use of nitrogen fertiliser and implement low emission slurry spreading is beyond the scope of the Plan.
- The Council supports the development of projects that convert biomass to energy subject to proper planning and environmental considerations and seeks to direct commercial bioenergy plants to locate on lands reserved for industrial use, brownfield sites adjacent to industrial areas or brownfield site in the rural area including farmyards, subject to considerations including the road network.
- The establishment of an agricultural committee in the Council is outside of the remit of the Development Plan.
- 15. Whilst the Draft Plan supports the progression and delivery of the N2 Ardee to Castleblayney road upgrade, the funding and management of the project are outside of the remit of the Development Plan.

Chief Executive's Recommendation

No Change

Submission No.:

LCDP DR349

Submitted By

Sean Murphy

Theme (s):

Chapter 5

Summary of Submission:

Policy Objective EE-56 which states "To support the provision of whiskey maturation facilities within the open countryside, where the scale of such development is appropriate to the location and surrounding area, which is located in reasonable proximity to appropriate levels of infrastructure and road access."

EE56 should be removed.

This proposal would appear to give priority to a specific industry, and is a direct contradiction of the recent decision by An Bord Pleanála ABP 302032.

Chief Executive's Response:

National and regional policy recognises the need to promote diversification in the wider rural economy in order to support employment and create sustainable rural communities. Taking this into account the Draft Plan includes policy objectives supporting rural enterprise development of an appropriate scale and the diversification of the rural economy. The inclusion of policy objective EE 56 is to recognise that whiskey maturation facilities of an appropriate scale and in an appropriate location may be considered in the open countryside. This is not a contradiction of the decision by An Bord Pleanála under reference ABP 302032-18 as this application was assessed under the 2015-2021 Louth County Development Plan.

Policy Objective EE 56 is an updated policy with regard to whiskey maturation facilities and provides clarity as to how they will be considered in the 2021-2027 County Development Plan.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR358
Submitted By	Emma Payne
Theme (s):	Chapter 7

Summary of Submission:

Request amendment to MOV 40

To support the progression of the long term upgrade of the existing N2 and in particular to protect the selected route (Route A/ Yellow Route) of the upgrade road scheme between Ardee and Castleblayney.

In Support:

- As per Jacobs report dated 24/08/2020, this is the preferred route.
- Funding is not at risk if CDP wording is changed, to the same wording provided in the Monaghan County Development Plan 2019-2025, extract provided.
- This will align with the NPF, page 40.
- Covid has changed how people work, there is less traffic on the N2 Ardee to Castleblaney Road, statistics provided from TII
- Road Traffic concerns- Statistic provided the majority of accidents caused by driver error not road layout.
- The N2 route was chosen before.

Chief Executive's Response:

The preferred route corridor for the N2 Ardee to Castleblayney upgrade was published together with the Option Selection Report in February 2021. This route corridor (Option A Yellow) predominantly follows the existing alignment of the N2.

It is not considered necessary to refer specifically to this route as the policy objective clearly refers to the protection of the selected route.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR364
Submitted By	Swim Ireland
Theme (s):	Chapter 4
Summary of Submission:	

- Background to Swim Ireland provided.
- Policy Objective SC 3 is noted
- There is no reference to swimming or pools in the draft Plan. Goal 4 of the Healthy Ireland for Louth Plan is to “Increase the proportion of people who are healthy at all stages of life”. Research consistently points to the importance of swimming particularly as it, along with cycling and running has the greatest potential for generating higher levels of active participation over the full life course. Statistics are provided. Ageing population demographic suggests that we should prioritise sports that will best facilitate physical activity among older adults. Swimming has numerous health benefits. It is one of the few sports that female participation is higher than male. There is no significant difference in participation rates in swimming between those with no disability and those with a disability
- Policy Objective SC 20 is noted, however the draft Plan would include a commitment to review swimming pool provision within the county and invest in the development of infrastructure (indoor and outdoor) to cater for the demand of a growing population. There is evidence to suggest that swimming and water polo are not well catered for in Louth and population growth will exacerbate the problem.
- Swimming is a fundamental life skill, details are providing regarding instances of drowning
- National Swimming Strategy: Swimming is consistently shown to be the second most popular sport behind personal exercise. The lack of reference in the plan to a sport that is so popular is a missed opportunity. Swimming pool provision needs specific attention.
- Open water: Section 4.7 is noted. Swimming is a readily accessible sport in the context of coastal recreation. Statistics are provided. The Draft Plan should consider the specific supports can be put in place to encourage participation in Open Water Swimming in Louth.
- Swimming forms a critical part of the €230m sports and fitness industry in Ireland which employs 9,500 people across the country.

Chief Executive’s Response:

The submission from Swim Ireland is both noted and welcomed. The Council acknowledges the references to the importance of participation in physical activity at all stages of life and the resultant benefits of same.

The Draft Plan supports building healthy, strong and socially inclusive communities as a key element in achieving sustainable communities which contribute to the ‘Quality of Life’ principles. The goals and actions of Healthy Ireland have been incorporated into the Louth LECP and from this have been produced a series of local plans including Healthy Ireland for Louth Plan, Disability Inclusion Plan and Age Friendly County Plan with corresponding policy objectives supporting their implementation (SC1-SC6).

In recognition of the importance of community and social infrastructure provision, and its importance in building sustainable and healthy communities, and fostering social inclusion and positive health outcomes, the Council is fully committed to the reservation of appropriate lands and encouragement of the provision of facilities, suitable for intergenerational activities, accessible to all. (SC 7-SC 9). In addition, both the narrative of Section 4.7.3 and corresponding policy objectives supports Louth Local Sports Partnership (LLSP) and the objectives of the LLSP Strategic Plan 2018-2022 which promotes the development of *inter alia* sporting infrastructure and facilities for everyone (SC-19-SC20).

Due to the wide and varied range of sporting activities and facilities available, it is not considered necessary or appropriate to specifically single out and reference swimming over and above other activities. The existing narrative and policy objectives are sufficiently broad and far reaching to cover all sporting infrastructure and physical activities.

Chief Executive's Recommendation :

No Change

Submission No.:

LCDP DR367

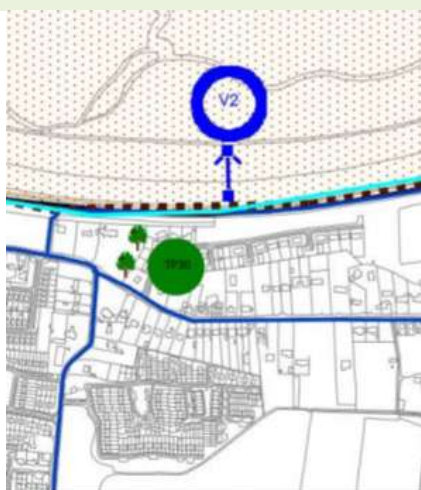
Submitted By

Joanna and Denis Daly

Theme (s):

Dundalk Viewpoint

Map showing lands subject to Submission:



Summary of Submission:

Please ensure that the V2 Protected View, Lower Point Road, Dundalk is correctly identified and included on the Louth County Development Plan 2021-2027

Chief Executive's Response:

The View and Prospect V2 of the Dundalk and Environs Development Plan 2009-2015 has been incorporated into the Draft LCDP as VP 36 identified on Map 8.15 and illustrated on Map 8.17.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR368
Submitted By	Cement Manufacturers Ireland
Theme (s):	Chapter 10

Summary of Submission:

- Background provided.
- Details also provided regarding Cement Industries Low Carbon Initiatives.
- Draft Plan's Strategic Vision is supported.
- Strategic Objective 4 of the Plan is mentioned and it is stated that concrete structures have low embodied CO2 compared to most other construction materials.
- Chapter 10, Policy Objective (PO) IU 79 is cited, it is stated that the carbon footprint per tonne of concrete has already been reduced and that further reductions are achievable. Whilst the goal of minimizing 'upfront' carbon reduction is important, low embodied construction materials can perform poorly in operation. IU 79 lacks content and is open to misinterpretation. EU directives now insist that a 'life cycle' approach to the built environment is taken.
- Requested that IU 79 is amended to read (bold):

"To support and promote structural materials in the construction industry that have low to zero embodied energy and CO2 emissions as assessed across the whole life of the building."

Chief Executive's Response:

Support for the Plan and strategic Policy Objective SO 4 is noted and welcomed as are the details regarding Cement Industries Low Carbon Initiatives. Herein, it is acknowledged that while a goal of upfront carbon reduction is important, so too is designing with whole life carbon in mind and therefore reference to 'embodied energy and CO2 emissions' should be made in the overall context of the 'life cycle assessment'. There is no objection to the inclusion of the proposed wording in Policy Objective IU 79.

Chief Executive's Recommendation :

Additional Wording to Policy Objective IU 79 as follows:

'To support and promote structural materials in the construction industry that have low to zero embodied energy and CO2 emissions **as assessed across the whole life of the building**'.

Submission No.:	LCDP DR369
Submitted By	Dom Gradwell on behalf of Drogheda Waterpolo
Theme (s):	Chapter 4

Summary of Submission:

- Background provided. Drogheda has a strong tradition of aquatic activity, various types listed.
- Aquatic activities are hugely inclusive, catering for all ages, genders and abilities.
- Drogheda Water Polo have both Ladies and Men's teams competing in the highest division in Irish Water Polo, the club has to travel to the National Aquatic Centre in Blanchardstown to train and play matches, a return journey of 90 minutes.
- Access to a pool could be provided to 16 hours a day, 7 days a week. There is a shortage of pool hours throughout the country.
- We are proposing that the council give very strong consideration to the provision of a 35m x 25m swimming pool and associated facilities thereby allowing sport and club to develop.
- A pool could be provided as part of a greater sports campus on the Northside of Drogheda, encompassing in addition a sports arena for indoor sports, track and field facilities, all weather pitches and a municipal stadium. Examples of similar complexes are provided.
- It would be open for community use and would improve community participation, health and wellbeing as well as a positive effect in terms of reduction in criminal activity.

Chief Executive's Response:

The submission on behalf of Drogheda Water polo is both noted and welcomed. In recognition of the importance of community and social infrastructure provision, and its importance in building sustainable and healthy communities, and fostering social inclusion and positive health outcomes, the Council is fully committed to the reservation of appropriate lands and encouragement of the provision of sporting facilities and infrastructure, suitable for intergenerational activities, accessible to all. (SC 7-SC 9)

Both the existing narrative of Section 4.7.3 and corresponding policy objectives supports Louth Local Sports Partnership (LLSP) and the objectives of the LLSP Strategic Plan 2018-2022 which promotes the development of *inter alia* sporting infrastructure and facilities for everyone (SC-19-SC 20) and such facilities would include for swimming pools. The LLSP working with others such as clubs, communities, commercial sports sector etc. identifies sports participation needs of the County and seeks to realise programmes which meet these needs.

The specific request for the provision of a swimming pool in Drogheda is an issue which may be more appropriately addressed in the forthcoming Joint LAP being prepared by LCC in conjunction with MCC. However, the council will continue a collaborative approach with all stakeholders in the identification and facilitation of facilities as needs are identified.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR382
Submitted By	Eamonn Mc Mahon
Theme (s):	Chapter 13
Summary of Submission:	

Table 13.13 in Chapter 13 of the draft Plan is referred to.

Comments on X Distance Requirements for entrances to non-domestic development and >6houses.

It is stated that The X distance or set back requirement of 4.5m for all entrances serving 7 or more houses or any non-domestic development is considered to be excessive and not to comply with National Standards as set out in Table 5.4 of the TII Publication Geometric Design of Junctions DN-GEO-03060.

Table 5.4 of DN-GEO-03060 sets out a 'desirable minimum' set back distance of 3.0m for any junction or entrance onto a rural National Road, Regional Road or Local Road. In practice, the TII considers a set - back of 3m to be suitable and safe for the junction of a National Road with another National Road.

In contrast, Table 13.13 seeks a 4.5m set-back to be provided at the entrance of a non - domestic development onto a Local Class 3 Road. The impact of requiring a larger set-back than is set out in the National Standard is that additional hedgerow must be removed to create the required visibility this is at variance with other policies.

It is noted that a footnote to Table 13.13 provides for a reduction in 4.5m to 3.0m in 'certain circumstances'.

However no clear indication or definition is provided as to what these 'certain circumstances' are. Any decision as to whether 'certain circumstances' apply would be purely subjective and shall inevitably lead to inconsistent decisions.

A clear non-ambiguous policy that the set-back on the entrances to all non-domestic developments and entrances serving > 7 houses should be 3.0m as per National standard should be adopted.

Comments on X Distance Requirements for entrances to single houses and up to 6 houses

The National standards allow a reduction in the 3.0m set back to 2.4m as a relaxation in the case of entrances onto National Roads. The National standards allow a further reduction to 2.0m in the case of lightly trafficked accesses onto Regional and Local Roads.

This approach recognises the lower traffic volumes and speeds on Regional and in particular Local Roads and indicates that reductions in the 3m set-back are acceptable in low speed environments with no associated unacceptable road safety implications

It is noted that a footnote to Table 13 .13 provides for a reduction in the stipulated 3.0m set- back for accesses serving up to 6 houses to 2.4m in 'certain circumstances'.

A more simple and clearer policy would be to adopt a 2.4m in the appropriate set-back in the case of entrances to single houses or up to 6 houses onto Regional or local Roads .

This has been deemed appropriate for entrances to single houses in the Monaghan Development Plan

Comments on Y Distance requirement on Class 2 and Class 3 Local Roads

A standard value of 75m has been applied to all Local Road Types and to Cul-de-sacs. The geometric road design of Class 2 and Class 3 Local roads are generally much lower than Class 1 Local Roads. Operational speeds of traffic along the Class 2 and Class 3 roads are therefore generally much lower than along a Class 1 road and a lower visibility requirement would apply.

The footnote after Table 13.13 means that the Y distance can be reduced below 75m if demonstrated that the speeds along the road are low (<42km/hr), there is a similar trigger in the current development plan but with a speed for 50km/hr. No reason has been offered for this significant drop in the threshold speed level.

The footnote note indicates that the applicable Y distance shall be that set out in DN-GEO-03060. The Y distance of 75m requirement for Local Roads does not tally with any standard within DN- GEO-03060. It is confusing therefore to partially introduce this document in this instance.

A simpler and more consistent approach would be to select 50m as the appropriate Y distance in cases where the operational speed along a Local Class 2 or Class 3 road is shown to be less than 50km/hr.

Chief Executive's Response:

It is acknowledged the appropriate design standard for Regional and Local roads is TII DMRB as set out in Department Circular. 3.0m is the desirable minimum set back. The number of housing developments of 7 or greater outside a 60kph limit (DMURS) is very rare and may not generally be encouraged; however the preference would be 4.5m in these circumstances.

The 4.5m also facilitates agricultural tractor with weights or front loaders and slow moving vehicles such as Bin lorries exiting an estate. 'X' distance of 4.5m came from previous DMRB standards on the basis of capacity which were generally revised down to 3.0m in later DMRB editions.

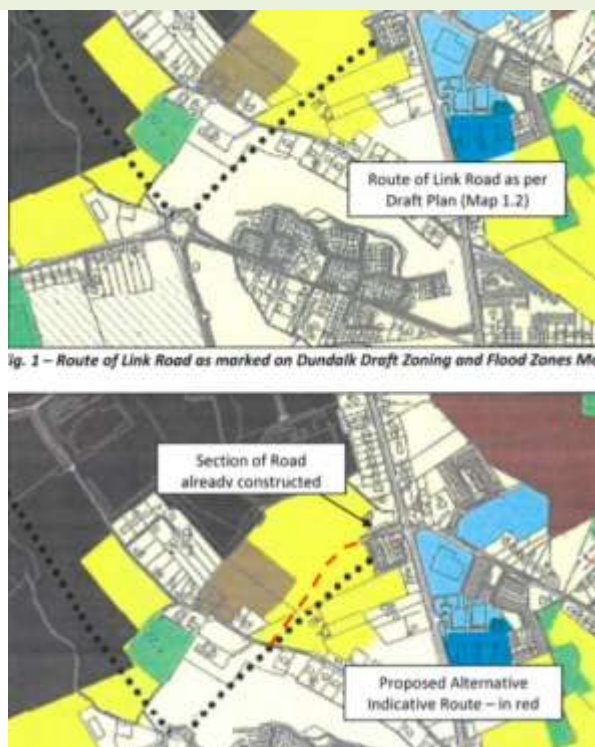
Rural Road Link Design DN-GEO-03031 is the design standard for regional and local roads as well as national roads. For short section changes 10.2.2 states '*appropriate Design Speed shall be chosen to correspond to the anticipated speed (85th percentile).*

The minimum of 75m 'y' in CDP on local roads has generally served well in that it captures most situations and equates to a design speed of between 50-60kph. The Design speed in table DN-GEO-03060 for 50kph is 70m which is very close to our requirement of 75m, therefore the step down in this table is 42kph range which allows for 50m Y distance. It may not be clear to some practitioners that the 'y' distance could also go above the minimum based on design speed.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR388
Submitted By	P Herr and Associates
Theme (s):	Road line Dundalk
Map showing lands subject to Submission	



Summary of Submission:

The route of the proposed Link Road between the Marlbog Road roundabout and the R132/ Old Golf Links Road as marked on then Dundalk draft Zoning and Flood Map (Map 1.2) does not accurately tie in with the short length of road already constructed as part of the Bellfield Residential development.

The line as shown shall adversely impact on proposals for the further development of the Bellfield Lands.

It is accepted that it is only indicative however it should be marked as accurately as possible.

Chief Executive's Response:

The route as identified on the Map is indicative however it is acknowledged that it should be amended to align with the section of the road as constructed.

Chief Executive's Recommendation :

Amend the Zoning and Flood Map and Composite Map for Dundalk as follows:

Amend the indicative line of the proposed Link Road between the Marlbog Road roundabout and the R132/ Old Golf Links Road so that the indicative line aligns with the section off the R132/Old Golf Links Road as constructed. See the proposed amended zoning map for Dundalk in Appendix 6 for details.

Submission No.	LCDP DR400
Submitted by:	Donnchadha MacRaghnaill
Theme (s):	Chapter 6: Section 6.3

Summary of Submission:

- Old Drogheda Society welcomes published Draft CDP
- Welcomes TOU 20 & TOU 23
- Requests that Section 6.3.2 include a reference to the Millmount Cultural Quarter

Chief Executive's Response:

It is considered appropriate to include a reference to Millmount within Section 6.3.2

Chief Executive's Recommendation

Recommendation: Insert additional text within Section 6.3.2 (additional text in red); Many of the heritage sites within County Louth have significant tourism potential. Such sites include Mellifont Abbey and Millmount in Drogheda, King Johns Castle in Carlingford, Ardee Castle and the heritage site of Monasterboice. In addition, Dundalk has a rich wealth of industrial heritage assets including the former Carroll's factory and the Great Northern Brewery site, as well as medieval sites such as Castletown Motte.

Submission No.:	LCDP DR402
Submitted By	Down Syndrome Ireland Louth Meath Branch
Theme (s):	Chapter 4

Summary of Submission:

- Changing Places are life changing facilities for a significant percentage of the 600,000 people in Ireland with profound disabilities(of which 14% are in Louth) who are unable to use a standard WC or accessible toilet.
- Drogheda is the largest town in Ireland and it is incumbent that Louth County Council provide a Changing Place facility in the town centre, which would be readily accessible.
- There are less than 15 registered Changing Places nationwide. The nearest Changing Place is at Dublin Airport.
- There is an increasing need for Changing Places facilities as are more people with disabilities become active in their community. It is the responsibility of Louth County Council to ensure they are fully included in society and their security, safety, comfort and dignity is reflected in the planned provision of the necessary toilet facilities to ensure that inclusion.
- Providing these toilets in public places will make a dramatic difference to the lives of thousands of people who desperately need these facilities.
- This submission respectfully requests that the Louth County Development Plan 2021-2027 provide for the provision of Changing Places facilities, initially in Drogheda, and then across the county.

Chief Executive's Response:

Recognition for and acknowledgement of the quantum of people with disabilities both nationally and within County Louth is noted. The Council has produced a *Healthy Ireland for Louth Plan 2018-2022* and a *Louth- Disability Inclusion Plan 2017-2022* which fully integrates with the Louth LECP. Policy Objective SC 4 of the Draft Plan supports implementation of this Disability Inclusion Plan.

It should be noted that a Changing Place was included in the Drogheda Swimming Pool as part of a major refurbishment programme.

Chief Executive's Recommendation :

No Change

Submission No.:

LCDP DR416

Submitted By

Aiden Torris

Theme (s):

Chapter 8, Flood Risk Assessment

Summary of Submission:National Monument (LH 018-064006)

There is a national monument (St Bridget's Well Ref: LH 018-064006) on site however no evidence of same has been provided. Designation based on folklore, storytelling and legend. Submitter feels harassed and requests that well is delisted.

Riparian Boundary.

Riparian boundary is satisfactory in a rural setting, but in Dunleer it passes through an accountancy practice, crosses entrance to property, through privately owned gardens and a graveyard. Consultation process is inadequate.

Footpath Layout.

Concern expressed regarding 'new footpath layout' at the station road/ main street junction.

Flood Maps.

Flood maps are inaccurate.

Submission accompanied by documentation including details from Dunleer Historical Society about St Bridget well in addition to Account of search for well.

Chief Executive's Response:

The National Monuments Acts 1930-2014 is the legislative code of addressing the protection of archaeological heritage in Ireland. Section 12 (1) of the National Monuments Act 1994 requires the establishment and maintenance of a record including maps, of these monuments and places which is maintained by the National Monuments Service (NMS) of the Department of Culture, Heritage and the Gaeltacht. The NMS advises on the protection applying to any particular monument or place under the National Monuments Acts by reason of it being entered on the Record of Monuments and Places. Any doubt regarding the status of the site requires consultation with the NMS.

The National Monument referenced is identified as a Ritual Site – Holy Well on the Record of Monuments and Places Ref: LH 018-064006 and is located within Dunleer’s identified Zone of Archaeological Potential (ZAP). The ‘delisting’ of the structure or its removal from the RMP is neither within the powers of the Local Authority nor within the remit of the Draft Plan.

The Riparian corridor is land directly adjacent to a waterway, the width of which may vary along the length of the waterway depending on its setting (e.g. urban or rural etc.). Riparian corridors provide a link between terrestrial and stream ecosystems and they also allow for maintenance works such as channel clearing.

The Riparian Corridor as outlined in the Dunleer LAP is indicative and the Council acknowledges that there is development located along its length which already exists and results in the mapping overlaying an entrance or building etc. This will not impact on existing properties. However, future development will have regard to the protection of riparian corridors in accordance with corresponding policy objectives included in either the Draft Plan (and Green Infrastructure Strategy) or Local Area Plans.

Observations relating to lack of consultation are noted. In this regard the Council would draw attention to the fact that all statutory requirements in relation to the preparation of both the Dunleer Local Area Plan and the Draft Louth County Development Plan have been followed. With regard to Dunleer, there were public consultations in the village regarding the preparation of the LAP where planning staff were available and indeed did meet with the public.

Reference to the footpaths at the junction of Station Road and the Main Street, refers to works carried out approximately two years ago and lies outside of the remit of this Draft Plan.

The flood maps prepared and flood extents indicated in Dunleer are accurate and derived from the Dunleer Flood Study 2016. This study included survey, hydrological analysis, hydraulic modelling and mapping in order to identify the level of fluvial flood hazard in Dunleer including the development of potentially viable flood relief works in Dunleer to suitably protect those properties at risk from fluvial flooding.

Chief Executive’s Recommendation :

No Change

Submission No.:	LCDP DR418
Submitted By	Shane Comaskey
Theme (s):	Chapter 7
Summary of Submission:	

- Policy Objective is included within Chapter 7 Movement, Section 7.5 Sustainable Transport; and/or to be included in Section 7.7.3 Table 7.2 Local Road, Sustainable Transport, and Environmental Improvement Projects; and/or to be included in section 7.6 Public Realm Improvements Table 7.1.

The proposal is as follows:

Within the lifetime of this Development Plan, for Louth County Council to improve the sustainable transport infrastructure and public realm on the R132 Dublin Road in the Haggardstown Area, specifically along the 1km stretch of the road between the signalised junction adjacent to Old Golf Links Road and the junction at Greengates; to allow for the rapid growth in population underway in the area.

The area is now essentially an urban/ village setting and there will be approximately 3000 (at least) housing units contained within 500 meters (approx.) either side of the R132 along this 1km stretch of the Dublin Road/R132. The sustainable transport improvements should include improved footpaths, off-road cycle tracks, pedestrian crossing points, an improved public realm (i.e. improved tree planting, landscaping, public lighting, bench's etc.) traffic calming measures, and possible traffic speed limit reduction; to be designed in line with the Design Manual for Urban Roads and Streets and the National Cycle Manual.

Rationale:

There will be approximately 3000 housing units in the area adjacent to the Dublin Road in Haggardstown. It is important to improve the attractiveness of walking and cycle for local trips and between Dundalk Town Centre and Blackrock Village.

Having regard to the facilities and residential units the area along the 1km stretch of the Dublin Road between the signalised junction with the Old Golf Links Road and the junction at Greengates is now essentially an urbanised/village setting.

The R132 is currently an unsafe and unattractive option for cyclists and pedestrians.

Footpaths are in a state of disrepair.

The speed limit should be reduced from 80km/hr to 60km/hr.

- Policy Objective to be included within Chapter 7: Movement, Section 7.5 Sustainable Transport; and/or included in section 7.6 Public Realm Improvements table 7.1.

Within the lifetime of this Development Plan for Louth County Council to carry out a Feasibility Study and Options Assessment Report with the aim to improve the junctions, the sustainable transport infrastructure and the public realm infrastructure on the N52 Inner Relief Road in Dundalk, from the Junction with the Dublin Road as far as the junction at St. Helena's Park.

The feasibility study should include, options for public realm improvements (such as tree planting, bench's, landscaping, street lighting, art installations etc.) cycle infrastructure, pedestrian crossing points, options for upgrading of the existing roundabouts and existing signalised junctions, and options for reduction in and formalisation of any excessive unnecessary traffic lane width.

Rationale:

The original function of this road was to totally by-pass the Town, without upgrade.

The road should be assessed for the suitability of installing sustainable transport infrastructure and to allow for pedestrian permeability and the upgrade of the existing junctions. List of developments along road provided. A review of improvements to the public realm and sustainable transport is required.

- Another Policy Objective to be included in the Development Plan as follows;

For Louth Council to carry out a feasibility study/options assessment study on the potential to provide an attractive and coherent pedestrian link in Dundalk Town Centre between the Marshes Shopping Centre and the area surrounding the Francis Street/Earl Street/Park Street Junction; with the aim to increase connectivity and pedestrian footfall between the shopping centre and the main streets of the town centre.

Rationale:

There is no coherent link between the Marshes shopping centre and the town centre, a clear and coherent pedestrianised area linking towards the main streets could encourage people shopping in the Marches Centre to venture further into the main streets of the town centre.

Chief Executive's Response:

The Council works closely and engages regularly with the National Transport Authority with regard to the funding and delivery of sustainable transport infrastructure that will make walking, cycling, and public transport more attractive modes of travel. In line with national and regional policy, the Draft Plan includes policy objectives supporting investment in sustainable transport projects e.g. MOV 5. This is a general policy objective that would apply to all parts of the County.

As part of the preparation of the Local Area Plan for Dundalk a Local Transport Plan will be prepared. Issues such as those raised in the submission will be examined in greater detail as part of the preparation of these plans. It is considered therefore that the issues raised in the submission are local issues that can be examined as part of the Local Area Plan for Dundalk.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR426
Submitted By	Padraig Herr
Theme (s):	Chapters 2, 13

Summary of Submission:

Issue 1

Removal local needs/ occupancy conditions for residential developments located within the rural area of County Louth in the case of re-building/ restoration of Listed and Protected Buildings.

Restricting residency on such buildings reduces the chances of them being restored and is counterproductive.

Issue 2

Removal the requirement for car parking in the case of developments relating to the upgrade or replacement of existing depilated houses constructed prior to 1963.

Many older properties have no car / parking provision and are located on site that cannot provide sufficient parking. Stringent requirement for off – street car parking is unwarranted particularly as this type of house is more suitable to people who don't have a car. The car parking requirement can prohibit development and resulting in properties remaining in their current state and eventually being registered as Derelict Sites.

Chief Executive's Response:

Issue 1

The Draft Plan does not require any proposal for the restoration of a Protected Structure in a rural area to demonstrate a rural housing need. There is also no requirement to demonstrate a local housing need for the re-use or redevelopment of a vernacular building. To clarify this issue additional text will be inserted into sections 3.18 and 3.19 addressing same.

Issue 2

It is noted that there are existing residential properties in urban areas that have no off-street car parking. In any proposals for the redevelopment of such properties consideration must be given to the historic use of the property and whether or not the redevelopment of the property would result in an intensification of the car parking requirement. Additional text could be inserted into section 13.14.12 Car Parking.

Chief Executive's Recommendation :

Issue 1

Insert the following text into section 3.18 'Vernacular Dwellings/Buildings':

Any applicant proposing to restore, renovate or adapt a vernacular building for residential use will not be required to demonstrate a rural housing need in accordance with section 3.17.4.

Insert the following text into section 3.19 'Replacement Dwellings':

Any applicant proposing to replace an existing dwelling residential use will not be required to demonstrate a rural housing need in accordance with section 3.17.4, subject to the dwelling to be replaced fulfilling the criteria for a replacement dwelling.

Issue 2

Insert the following additional text in section 13.14.12 Car Parking (additional text to be inserted after bullet point 5)

A reduction to the car parking requirement may be acceptable where the Planning Authority is satisfied that:

- There was no off street car parking provided with the existing/previous use of the property and the redevelopment of the property would not result in a significant increase in the car parking requirement.

Submission No.:	LCDP DR442
Submitted By	Gerry Murphy on behalf of "The Birches" Alzheimer Day Centre, Dundalk.
Theme (s):	Chapter 4
Summary of Submission:	

The submission provides:

- An outline of the services provided by 'The Birches', Alzheimer Day Centre, Dundalk
- Background and statistics regarding Dementia in Ireland and Louth
- Synopsis of the value of Neighbourhoods for Life Designing Dementia friendly outdoor environments.
- Praise for Age Friendly Officer in Louth and a number of County Councillors.
- Highlights the need to advocate for people who may feel and can be marginalised.

Chief Executive's Response:

The submission including background information in relation to Dementia both nationally and locally, the services provided by the Birches, acknowledgement and support for officers of the Council and elected members are all noted and welcomed as are the needs of the marginalised to be advocated and reference to the Oxford Institute studies on how outside environments could be made dementia friendly.

Louth has led the field on the Age Friendly County Programme and as the first Age-Friendly County in the WHO global age-friendly cities network has paved the way for many initiatives for older people to improve their health and wellbeing. The learning from Louth has informed not only the National Positive Ageing Strategy but also the National Age Friendly Plan, which seek to ensure Ireland will be a society for all ages, which celebrates and prepares properly for individual and population ageing, enabling all to enjoy physical and mental health and wellbeing.

The Council has produced a *Healthy Ireland for Louth Plan 2018-2022* and a *Louth Age Friendly County Plan 2017-2022* which fully integrates with the Louth LECP. Priority One of the Healthy Ireland for Louth Plan relates to ‘Shared Space’ where the goal is ‘To create an environment where every individual and sector of society can play their part in achieving a healthy Louth’ and where the objective is ‘To create active friendly environments using a participatory planning approach and the principles of universal design’.

Implementation of these Plans is supported by Policy Objective SC 2 and SC 5 of the Draft Plan.

Chief Executive’s Recommendation :

No Change

Submission No.:	LCDP DR443
Submitted By	Tomás Ó hEochaidh
Theme (s):	Chapters 2, 3, 9, 10, 11

Summary of Submission:

- Housing schemes to be built in association with schools, shops, community centres and recreational facilities.
- Roads, water supply and sewerage be upgraded and maintained having with regard to volume of usage, safety, health standards and quality
- Promotion of environment, wildlife and fauna preservation, clean waterways, litter elimination, recycling education, carbon reduction methods.
- Combat coastal erosion with expert advice to co-ordinate policy.
- The renewal and conservation of old historical buildings especially forges and handball alleys
- The rural population should not be denied the right to build regardless of size of original holding.
- Renewal and preservation of Drogheda required; link between Donaghy’s Mill and Old Abbey, renewal of Mall, Whitworth Monument re-erected, boardwalk between Dominick’s Bridge and viaduct provided and refurbishment of upper floors of building.
- Development of Northern Cross Route is imperative for town expansion. Additional employment and training facilities for the IDA, would be provide in conjunction with other facilities to be provided in the Northern Environs. Its development would also relieve traffic congestion in the town.

Chief Executive’s Response:

The Draft Plan recognises that an integral part of creating sustainable communities is ensuring that the necessary social and physical infrastructure is provided in tandem with residential growth.

In order to reduce our carbon footprint there is a need for settlements to be more compact with greater opportunities for walking and cycling and public transport investment. This will assist in reducing our dependence on the private car.

Environmental protection and climate change are cross cutting themes of the Draft Plan.

The rural housing policy seeks to achieve a balance between preserving the open countryside whilst also supporting rural communities.

The importance of vernacular buildings to the built heritage of the County is acknowledged. The re-use and adaptation of these buildings is supported.

In Drogheda there will be an emphasis on the regeneration of the town centre including the progression of the Westgate Vision. In tandem with these regeneration projects there will also be support for the development of the residential and employment lands in the northern environs of the town and the progression of the PANCR, which is a critical infrastructure project in the future growth and development of the town.

Chief Executive's Recommendation :

No Change

Submission No.	LCDP DR446
Submitted by:	Ray Ballantine.
Theme (s):	Appendix 11, Chapters 2, 8, 9

Summary of Submission:

- Welcome the publication of the Draft Louth County Development Plan 2021 – 2027 in particular in relation to sustainable development.

Greenore

- Concern expressed regarding unsympathetic developments that have impact upon uniqueness of Greenore ACA (Chapter 9) and Rural Village (Volume 2).
- Requested that a Grade I Conservation Architect carry out an Architectural Character Appraisal of Greenore ACA, and that appropriate policies requiring new port/ industrial developments have regard to its historic origins, the Victorian engineering and architectural design/ character, and that these are added to Chapter 9.
- Request that Policy Objectives in 15.4 are strengthened to protect the architectural quality of Greenore for the benefit of residents and visitors.
- Additional policy is required to ensure that all works to the public realm, infrastructure or drainage, green areas, street lighting or sub-stations whether carried out by residents, private developers, utility companies, statutory undertakers, the Local Authority, or for it by subcontractors are carried out in a manner and that materials appropriate to the architectural and historic public realm. All works shall be designed and supervised by a Conservation Architect or Landscape Architect specialising in historic public realm.
- It is requested that the R175 to Greenore, The Shore Road, Anglesey Terrace and Euston Street are added to the list of Scenic Routes in Table 8.19 in Chapter 8 Natural Heritage, Biodiversity and Green Infrastructure.
- Speed visual display sign at the top of Euston Street is welcomed. Requested that other suitable traffic calming measures are investigated and implemented before entry to the village.

- I recommended that there is more inter-connectivity between the policy objectives in different chapters to ensure that development does not occur in separate policies or in separate chapters.
- Requested that Policy Objectives EE 25 & 26 Policy Objective EE 25 are amended to fully incorporate the objectives of sustainable development to ensure that the air quality, marine environment and the health and wellbeing, the residents of Greenore are afforded equal due regard in any development management decisions
- Request that Greenore Port are required to fully comply with all relevant statutory environmental requirements and that Louth County Council take appropriate enforcement Action.

One off Housing

- Saddened and concerned that our children would effectively be precluded from building their future family homes.
- Support any initiative that helps to maintain, improve and sustain a long-term environmentally friendly future.
- Many new properties have either been built or purchased by property developers and individuals from outside our community, thus impacting the local environment and inflating house prices for younger, local families. Young people being priced out of the local market

Denying young local people from building on land, owned by families for generations is in correct and short sighted. Impact on sports clubs and local schools outlined.

Chief Executive's Response:

Recognition of publication of Draft Plan and its formulation based on the UN Sustainable goals is noted. Past development within the village has been guided by the principles of proper planning and sustainable development of the area, the Development Plan applicable and the policy objectives contained therein.

The Draft Plan acknowledges the importance of and contribution made by Architectural Conservation Areas and in recognition of this there are a total of 36 designated ACAs in County Louth, including Greenore. During the lifetime of the Development Plan it is intended that there will be more ACA Character appraisals carried out, however it is not intended to specify the locations.

The objectives listed regarding the Greenore ACA include preservation of the village and its setting where development complements the character of the village and does not diminish its distinctiveness of place, preservation of the historic street pattern and traditional elements etc. These are further supported by the policy objective as provided for in Chapter 9 of the Plan as they relate to the architectural built heritage. Additional text in relation to Section 15, Appendix 11 has been included as per Submission No. 709.

The Draft Plan provides a narrative, policy context and guidance regarding ACA's within County Louth. Narrative and policy context are detailed in Section 9.6.1 (BHC 26-32) while guidance includes: Guidelines for Works in ACA's, A Guide to ACA's in Louth and Development Management Guidelines for ACA's which are detailed in Appendices in Volume 3.

The Draft Plan, through Policy also seeks to ensure that any new service infrastructure will not be detrimental to the character of the ACA while objective 5 of the ACA seeks the use of appropriate materials, street furniture and lighting in any public development of the area.

There are currently no proposals for the inclusion of Greenore within the Scenic Route listing.

Issues relating to visual speed displays are noted. These are operational issues and lie outside the scope of the Development Plan.

All applications received throughout the County are considered and assessed in a holistic manner taking account of all policy objectives within the Plan as applicable. Developments are not considered in silos but rather in the whole ensuring full consideration of inter-connectivity and cross cutting themes. Notwithstanding this, the benefits of cross-referencing in the Plan are acknowledged and the Council will endeavour to include cross-referencing in the Plan where possible.

It is recognised that there are challenges in operating a commercial port in an area rich in architectural heritage. As indicated in this submission, it is important that any development of the Port has cognisance of, and respects the character of, the surrounding area. It is considered that there is sufficient guidance and policy context within Chapters 5, 9, and 13 of the Draft Plan that would support the development of the Port whilst also ensuring that any development would be sensitive to the surrounding environment. As part of the response to Submission No.709 it is recommended to include an additional policy objective that supports the protection of the built heritage in the County whilst also supporting economic renewal and sustainable development.

The legal requirement for Greenore Port to comply with statutory planning or environmental requirements does not need to be stated as it is covered under legislation. In addition Planning Enforcement is separate to the Development Plan.

In regard to the rural issues raised in the submission please refer to Rural Policy General – Composite Response.

Chief Executive's Recommendation

[See Recommendations to Submission No. 709](#)

Submission No.:	LCDP DR447
Submitted By	CWPA on behalf of Rosaleen Quinn
Theme (s):	Age Friendly Policy

Map showing lands subject to Submission:



Summary of Submission:

The site is located on lands (the former Táin Adventure Centre), Ballyoonan Road, Omeath, Co Louth.

The basis of this submission is to ensure that age friendly housing is included in all consideration of housing provision generally, both public and private. It is the objective of this submission to have the appropriate planning policies implemented in the adopted development plan ensure the highest standard of planning policy is included in the interest of sustainable development.

Brownfield Status.

There are existing buildings on site (the former Táin Adventure Centre) are in a state of disrepair,

An overview of the NPF and RSES's is provided in terms of encouraging brownfield/infill development, compact growth and regeneration. The role of active land management is also outlined

Development Proposal

- Universally designed independent living units, in blocks varying in height from 2-3 storeys.
- Clinical Gerontology Centre will provide critical services for the local community, the greater Louth area and beyond.
- Day centre.

Rationale and justification for Proposed Development.

- Figures are provided regarding Ireland's aging population; the population of over 65's is set to increase by 56% between 2017 and 2026 (CSO) and it is incumbent on planning authorities to ensure the housing needs of the ageing population are met.

- The types of supported housing options are outlined: Independent, assisted and specialised living. There is a gap in the housing stock for housing options aligned with the aforementioned three models (The Housing Agency/ ISAX, 2016). The Covid 19 pandemic has highlighted the importance of supported living models, where possible.

Statutory Planning Context.

An analysis of the draft Louth CDP has been undertaken, Section 4.18.3, RES 7, RES26, RES 45 and RES 46 are specifically mentioned.

Notional Floor Plans have been provided.

The proposal will be in line with 'Universal Design Guidelines of Homes in Ireland' and shall be dementia friendly.

Chief Executive's Response:

The submission does not seek any changes to the land use zoning.

It is accepted that the site falls under the definition of 'brownfield' as per the 'Sustainable Residential Development, Guidelines for Planning Authorities 2005' and as such any proposals for a change of use would be considered in that context.

It is noted that there is an extant permission pertaining to the site File Ref. No. 19/552 which permitted a nursing home and tourist accommodation comprising of 51 cabin style units and 8 no. 'gateway' pods.

Age friendly policies have been incorporated in the plan and have also been addressed in submission no. 264.

It is acknowledged that notional Floor Plans have been submitted in conjunction with this submission, however, any application on the site shall be assessed on its own merits and in accordance with Chapter 3 and 13 of the draft Louth CDP 2021-2027.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR466
Submitted By	Fintan Malone
Theme (s):	Chapter 3, Chapter 8
Summary of Submission:	
• Glenmore has been spoilt by ribbon development • Mountain streams have been piped and blocked, during heavy rainfall house and properties are damaged, there is difficulty getting insurance. • Authority should insure water courses and streams are kept clear and not interfered unless consent has been given from planning authority.	
Chief Executive's Response:	
• The Draft Plan recognises that the open countryside is a valuable resource to the County and seeks to achieve a balance that will allow the countryside to be preserved for future generations whilst also facilitating the growth of the rural economy and rural communities. • The Draft Plan requires the use of Sustainable Drainage Systems to ensure the slow release of run-off to drainage systems and water courses. This is set out in policy objectives IU 18 and IU 19. • The culverting of streams without the necessary consents is outside the scope of the Development Plan.	
Chief Executive's Recommendation :	
No Change	

Submission No.:	LCDP DR471
Submitted By	Peter and Eileen Mullen
Theme (s):	Chapter 9
Summary of Submission:	
Exempt the curtilage of Smarmore Castle from policy objectives BHC 15, BHC 16, BHC 17 (pg. 9-15) and BHC33 (pg. 9-24) of the draft Louth CDP 2021-2027.	
In Support:	
• From 1995-2013 the submitter ran an accommodation and leisure business at Smarmore Castle. When the business closed, the property and lands were sold. • Planning permission was sought for bungalow on lands adjoining castle grounds. It was subsequently refused on the basis of HER 34, HER 35 and HER55 of the current Plan. • It was decided that the residence was in the "curtilage" of Smarmore Castle (based on a map of the castle's estate from 1836 to 1846) when the grounds were around a hundred acres and not the ten or so as they are now. • In the proposed development plan, Smarmore is listed in Table 9.5 Historic Gardens and Designed Landscapes (pg. 9-22) based on details from the National Inventory of Architectural Heritage (NIAH) website. However, NIAH currently outlines that there are no formal gardens, avenues, vistas or garden of note remaining.	

- Planning permission has been granted for a number of residential, commercial and farming activities within the curtilage of Smarmore (planning reference 17/151, 17/894 and 19/569).
- There is no objection to same but it is unfair and inconsistent.

Chief Executive's Response:

Louth is fortunate to host a rich and varied heritage of buildings and structures of architectural, historical, archaeological, artistic, cultural, scientific, social or technical importance. The mechanism for protecting these buildings and structures is by inclusion on the Record of Protected Structures. This affords both recognition of the structures importance whilst also seeking the protection of its special character from adverse effects.

The National Inventory of Architectural Heritage (NIAH) identifies Smarmore Castle as a fine surviving example of eighteenth-century architectural values and wherein it is classified as being of Regional Importance in County Louth. The structure is included in Louth's Register of Protected Structures as Lhs017-050. The Planning and Development Act 2000 (as amended) specifically states that a Protected Structure includes *inter alia*; 'the land lying within its curtilage'. Consequently, the proposal to exempt the curtilage of Smarmore Castle from the policy objectives as they relate to the curtilage is not in accordance with legal requirements as stipulated by the Planning and Development Act 2000 as applicable to Protected Structures. Nor indeed is such a proposal desirable.

The Council recognises the importance of historic gardens and designed landscapes and their role in providing the setting for Protected Structures and ensuring they are protected from encroaching or adjacent development. Smarmore Castle in the NIAH Garden field survey was identified as worthy of protection and remains in both the NIAH and the Historic Gardens and Designed Landscapes of County Louth as identified in the Draft Plan. Issues relating to specific planning applications lie outside the remit of the Plan.

Chief Executive's Recommendation :

No Change

Submission No.:

LCDP DR473

Submitted By

Avison Young on behalf of Tesco Ireland Limited

Theme (s):

Rezone Dundalk and addition wording

Map showing lands subject to Submission:

No map submitted

Summary of Submission:

Request:

- The Longwalk Shopping Centre is rezoned from Regeneration (D1) to Town and Village Centre (B1) zoning with a local objective which seeks to promote regeneration
- Delivery and access routes, loading bays and spaces to undertake deliveries should be acknowledged and safeguarded.

- Convenience estimates in Retail Strategy should not act as caps nor be treated prescriptively.
- Flexible land use zoning should be considered.
- That the draft Louth CDP 2021-2027 recognise the design requirements of modern retail formats.

In Support:

Background

Tesco operate 4 stores between Dundalk and Drogheda. A summary of NPF is provided in terms of population projects and the strategic location of Drogheda and Dundalk, the need for supporting infrastructure is highlighted and also need to support established retail facilities to enable them to cater for expanding catchments.

Supportive Retail Policies

- New retail growth areas should be served by retail facilities, Louth County Council is requested to provide flexibility in terms of zoning policies. An objective of the NPF is to establish self-sustaining communities, settlements should be adequately served by retail floorspace.
- Delivery and access routes, loading bays and spaces to undertake deliveries should be safeguarded. It is requested that the delivery requirements of convenience stores are acknowledged
- Tesco supports urban renewal, public realm and transport improvement schemes and encourages sustainable modes of transport. However failure to accommodate deliveries, especially early morning, could have a detrimental impact on premises.
- Retail strategy is welcomed. Estimates should not act as caps or treated prescriptively, quantitative limitations can change. Authority is requested to clarify that figures are 'best estimates' and future convenience retail proposals will be treated on their own merits.

Appropriate and Relevant Zoning Objectives

- It is requested that the Longwalk Shopping Centre is rezoned from Regeneration (D1) to Town and Village Centre (B1) with a local objective which seeks to promote regeneration.
- The list of uses 'open for consideration' on lands zoned Regeneration (D1) does not include 'Off licence or Supermarket / Shop (Convenience) greater than 1500m² / Shop (Convenience) less than 1500m².
- Overall regeneration of the long walk shopping centre is welcomed, however, it could be facilitated under the Town Centre (B1) zoning.

Requirements of Retailers

- Convenience stores require large floor plates and significant car parking (weekly shop is car dependant) where such sites are not available in town centres, alternative lands that are sequentially appropriate should also be identified. Flexible land use zonings should be considered.

- The following factors determine the attractiveness of a location: public realm, retail layout achievable, traffic management and movement strategy, servicing/ deliveries and accessibility, height/ mix of uses, benefits of improved locale, car parking , health and safety and planning policy restrictions.
- Back of house areas are required for efficient operation of a modern supermarket. Details are provided regarding same. Click and collect services are likely to play a key role in the future.
- It is requested that the draft Louth CDP 2021-2027 recognise the design requirements of modern retail formats.

Chief Executive's Response:

The submission goes into significant detail in relation to retailer requirements. It is considered that Chapter 13 (Section 13.12) contains a robust set of development management guidelines and is sufficiently detailed to guide future retail developments within the County.

The Draft Plan also provides for a range of flexible land use zoning categories relating to retail. It is considered that the categories permitted in principle and open for consideration within retail related zonings (e.g. Town or Village Centre) are sufficiently broad to allow for a degree of flexibility.

As highlighted within the Draft Retail Strategy, the indicative floor space requirements set out are only intended to provide broad guidance as to the additional quantum of floor space provision. The quantum of floor space should not be considered as upper or lower limits, merely as indicative of the scale of new floor space required to meet the needs of existing and future population and expenditure within the County. This is in accordance with the Retail Planning Guidelines 2012.

The submission requests that the Longwalk Shopping Centre is rezoned from Regeneration (D1) to Town and Village Centre (B1) zoning with a local objective which seeks to promote regeneration. The purpose of the 'Regeneration' zoning is to encourage and facilitate opportunities for regeneration and place making. The existing Longwalk Shopping Centre is located immediately south of the former Carroll Village Shopping Centre. Whilst Tesco is the anchor tenant, the centre is experiencing high levels of vacancy with an occupancy rate of approximately 50%. The aim of this designation is to assist in stimulating the redevelopment of this centre where there is an opportunity for retail and associated mix of uses. It is therefore considered that the Regeneration (D1) zoning is appropriate for the site. However, it is considered that Shop (Convenience) $\geq 1,500\text{m}^2$ and Shop (Convenience) $\leq 1,500\text{m}^2$ could be included as uses open for consideration within the Regeneration zoning objective.

Chief Executive's Recommendation :

To include Shop (Convenience) $\geq 1,500\text{m}^2$ and Shop (Convenience) $\leq 1,500\text{m}^2$ as uses which are open for consideration within the D1 Regeneration zoning objective.

Submission No.:	LCDP DR492
Submitted By	Charlie McGrath on behalf of Matson Lodge / Millhaven Residents Association

Theme (s): General

Summary of Submission:

Issue with the traffic and parking in particular at drop off and collection times at the three schools that have been built directly opposite Matson Lodge. Cars park all over estate. There needs to be parent parking allocated for all three schools. The building of "Gort Bui" will make the traffic situation worse. There should be a roundabout and thorough traffic planning measures. Access to Matson Lodge and Millhaven from Moneymore estate is through the "cut". In recent years this has become a location for antisocial behaviour, this should be closed and a proper, lighted, safe access route to school provided.

Chief Executive's Response:

A multi-dimensional approach can be taken to address the issue of congestion including the promotion of alternative modes of transport to the private car, where feasible, to more sustainable modes of transport including walking, cycling, and car sharing. This, in addition to implementing a Mobility Management Plan may assist in reducing congestion at the school.

With regard to the requirement for a roundabout, this is determined by traffic volumes. The traffic volumes in the area would not warrant the construction of a roundabout. Issues regarding permeability and connectivity can be examined in greater detail as part of the preparation of the Joint Local Area Plan.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR493
Submitted By	Jacinta Walsh on behalf of Autism Support Louth and Meath.

Theme (s): Chapters 4, 7

Summary of Submission:

Request to include 'Changing Places Initiative for Drogheda' in Plan for all areas of the county. Signage is standardized and standard, universal visual symbols are used whenever possible as most people with Autism are visual learners, examples of communication boards in Wexford and Meath are provided. The roads and paths around Drogheda ABACAS School in Congress Avenue/Priests Lane are in a disgraceful condition. These need to be totally replaced.

Chief Executive's Response:

Recognition for and acknowledgement of the quantum of people with disabilities both nationally and within County Louth is noted. The Council has produced a *Healthy Ireland for Louth Plan 2018-2022* and a *Louth- Disability Inclusion Plan 2017-2022* which fully integrates with the Louth LECP. Policy Objective SC 4 of the Draft Plan supports implementation of this Disability Inclusion Plan.

All road signage (regulatory signage and roadside tourism) must be in compliance with the Traffic Signs Manual 2019 which gives effect to colours, size and type of lettering and is a national standard document. All signage within new buildings must meet minimum requirements in accordance with the Building Regulations.

Specific concerns in relation to the condition of footpaths in specific areas of Drogheda are not an issue for the Draft Plan; and is a matter for roads operations.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR532
Submitted By	Dolores Minogue
Theme (s):	Chapters 2, 3, 5, 7, 11
Summary of Submission:	

The submission requests the following:

- Off rural housing should be as per the current Louth County Development Plan 2015-2021, the qualifying criteria of 18 years should be removed. Not being allowed to build in the countryside because you already own a house is too restrictive, various circumstances are outlined. If you have connections to the area you should be allowed to build.
- Ardee by pass continues to completion
- Ardee Mid Louth to seek greenway to connect town and villages this would benefit tourism and the environment and allow people to walk and cycle in a safe area.
- Running track in ardee , with Ardee Athletic in the Area for over 50 years there is a need to facility athletic in the town
- Recycling centre in Ardee
- Dunleer railway station to be reopen to alleviate traffic and help environment.
- Park and ride at junction of Stabannon /dromin to help with parking
- The nodes of Balapousta to be extend to address the growing population in the area
- IDA to invest in Ardee Mid Louth as the area has good access to two major cities, Dublin-Belfast.

Chief Executive's Response:

- In regard to the rural issues raised in the submission please refer to Rural Policy General – Composite Response.
- Table Chapter 7, Table 7.3 lists National Road Projects including the N52 Ardee bypass, MOV 42 supports its progression.
- The importance of Greenways in the provision of a sustainable transport mode, as well as a recreational facility and tourism asset is acknowledged throughout the Draft Plan. MOV 27 promotes the provision of Greenways throughout the County in accordance with the Strategy for the Future Development of National and Regional Greenways. It should also be noted that Louth County Council was recently successful in securing funding for Ardee 2040 under the Rural Regeneration and Development Fund (RRDF) arising from the NDP, to support the implementation of regional and local authority development plans. Ardee 2040 is wide ranging in scope and includes inter alia the provision of walkways, amenity areas, recreational facilities etc. Included is a proposal for pedestrian access from the Ardee Treatment Works in a westerly direction providing connectivity to the south of the town and north to the former railway line..
- The provision of sports facilities throughout the County is supported through SC 19 and SC20.
- Policy Objective ENV 25 pertains to the provision of an additional recycling centre in the Mid Louth area.
- Submission 89 from the National Transport Authority and the C.E response and addresses the issue of the re-opening of the rail station.
- MOV 18 seeks to work in conjunction with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) and any other stakeholders in identifying suitable locations for and the development of bus based park and ride and car based park and share facilities in the County.
- As part of the strategy of strengthening the fabric of villages and creating sustainable rural communities this Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands available within the Ballapousta (to the northwest) to cater for any demand for housing which may arise of the Plan period.
- Policy Objective EE4 relates to the Council working in partnership with the IDA and other national employment agencies to promote Louth as a location and support employment generating initiatives and maximize job opportunities within the County. EE 5 advocates that the Council work closely with the IDA and other agencies in promoting and facilitating foreign direct investment.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR569
Submitted By	Katie Holten
Theme (s):	Chapter 7, Chapter 8
Summary of Submission:	

Request:

- Ardee Bog be identified as an NHA candidate, designated a Raised Bog for conservation and rewetting and that the Local Authority work with local landowners and stakeholders to achieve agreement on and fulfil the objective.
- The view of Ardee Bog from local road L5232 be designated a Protected View.

Support:

Both proposals are in accordance with NBG21 and NBG22.

Introduction:

Bogs store 70% of the soils organic carbon. Ardee bog was formed 10,000 years ago. It is listed under both an Area of High Scenic Quality (AHSQ6) and proposed Natural Heritage Area (pNHA 1454) These proposals help ensure its protection, restoration and conservation. Roads can be relocated while peatlands cant. Peatlands are connected to waterways, disturbing them disturbs the whole watershed. Furthermore Ardee bog is a designated OPW Flood zone, floods currently experienced in the locality will be exacerbated if a road is built over the peatland. Map submitted showing Ardee Bog Flood Zone, it is stated that flooding has got dramatically worse over the years.

Two maps submitted, one showing the extent of the proposed pNHA and the other with a hand drawn line showing Ardee Bog's surrounding habitat and flood zone. It is stated that the entire area is a pNHA and should be protected.

Concern expressed regarding the environmental and ecological impacts of the proposed N52 Ardee Bypass. An Environmental Impact Assessment was never carried out and the recent public consultations made no mention of Environmental issues. There will be cause for lawsuits if it proceeds.

The proposed N52 Ardee Bypass runs directly through the pNHA of Ardee Bog and its surrounding habitat. This area is of ecological importance and needs to be protected.

Excerpt from Irish Peatland Conservation Council survey in 1990 and 1998 is provided:

The legislative instruments have been adopted by Ireland are listed.

The submission to protect the bog inherently proposes the construction of part of the N52 Ardee by pass through Ardee Bog, it would breach EU policies, laws and directives; would be costly and will not alleviate traffic problems in the town.

Flood Risk:

It is stated that flooding around Ardee Bog is a serious problem and has got worse, the bog road sags and is starting to crack. Details are provided regarding an international study on flooding and local instances of same.

In 2012, under EU directive, the OPW mapped all known flood zones and the section of Ardee Bog chosen for the N52 Ardee Bypass was designated as a Flood Zone. Locals are concerned that the solid base foundation will result in a displacement of flood waters and breach homes. Photos have been supplied and drone footage of same is available on a facebook page.

Flood Risk Assessment

The submission queries if a flood risk assessment has been carried out, and questions if Louth County Council will take responsibility for any future damage.

Ardee Bog Timeline

A timeline of Ardee Bog has been provided, from its interception 10,000 years ago to December 2020 when this submission was made.

Background History of the Proposed Ardee Bypass Plan

- Parent permission granted in 2001 with a subsequent amendment 'under change in Alignment N52/N2 Bypass' added in 2005, with An Bord Pleanála approval in 2006. No Environmental Impact Assessment was undertaken despite clear rules and regulations directing this as 'best practice' for public projects.
- Also, the project traverses a pNHA, which merits another separate and appropriate Environmental Assessment.
- In October 2019, following an Oireachtas meeting, the public were informed by LCC & TII that this project, which had been reactivated in 2018, was in breach of Environmental Law 2012.
- Regardless, in November 2019 clearance works took place across the length of the Ardee Bog pNHA, with the removal of topsoil, hedgerows and trees, and construction of boundary fencing for the proposed route of the N52 Ardee Bypass.
- Submitted appalled to see disregard for the law and lack of respect for countryside, peatlands, local watershed, and a pNHA.
- New flooding has occurred adjacent to these works, photo submitted
- Plans and designs for the N52 Ardee Bypass breach many EU laws.
- Louth County Council cannot use planning permission that was granted in 2001; the Aarhus Convention ruled against this practice and that ruling was accepted by the Irish government.
- Furthermore works carried out to fulfil the fencing tender were in fact illegal having occurred after an Oireachtas meeting ordered all work stop immediately. This text; "...and fencing was erected in advance of the main construction contract" in the Public Consultation leaflet is misleading. The fencing (which included tree/hedgerow felling) was erected after work was ordered stopped.

Contradictions of Louth County Council Policies.

- pNHA of Ardee Bog also known as 'Ardee Cutaway Bog': (site-code 1454)
The pNHA is an area on the edge of 'The Great Bog of Ardee' which was reclaimed and has become 'set aside' grasslands hosting a wide diversity of flora and fauna living within this unique habitat.

We refer to the Louth County Development Policy document 2009-2015, page 121, Chapter 6.5, Table 6.4, Ref SR17 (i.e. pNHA) and again in LCC Development Plan Volume 1, page 177, Chapter 5.15.3, Table 5.15, Ref SR17, lists Townparks Ardee as “an important Scenic Route which requires protection and that any development that would interfere with or adversely affect these scenic routes will not be permitted.”

This pNHA grassland area is exactly where hedgerows and trees were cleared to install boundary fencing for the proposed bypass. Replacing this scenic area with a Bypass, thereby contradicting their own policy. Other listed sites remain protected and this inconsistency is suggestive of double standards and is unacceptable.

- Louth Biodiversity Action Plan

Louth County Council adopted the National Biodiversity Plan which aims to halt the loss of biodiversity by 2010. Here is an opportunity for Louth County Council to “halt the loss of a rare biodiversity area” i.e.: The pNHA of Ardee Bog. Constructing a road through the pNHA is contrary to Policy CON 11 of the Louth CDP 2015-2021.

Irish & European Union Legal Obligations:

There is a legal obligation to protect Peatlands including this pNHA of Ardee Bog under National and European legislation. Extract from IPCC letter dated 31st August 2018 provided. The bog was assigned a ‘Grade B: National Ecological Importance’ as a result of the ‘The Louth Wetlands Survey (2011), this is indicative of its intrinsic value. Recommendations were made to various bodies including, Louth Co. Council & National Parks and Wildlife Service that would safeguard and enhance Ardee Bog.

The submission requests that an ‘Appropriate Assessment’ (pursuant to Article 6 of the Habitats Directive) is carried out in advance of the progression of the scheme and that Louth County Council adopt policy statement which safeguard sites like Ardee Bog.

Reasons why an Environmental Impact Assessment is essential:

- Bog habitats are rare and need to be safeguarded. This project, as currently envisaged, will result in fines from the EU.
- Road construction will be over peat soil it has serious implications for our local water system. The area is a designated Flood Zone, furthermore, construction process could result in contamination of the water system this could have a devastating effect on the water supply and the water network and Natura 2000 sites. These watersheds include Dundalk Bay SPA (site code 004026), Dundalk Bay SAC (site code 000455) and Stabannan-Braganstown SPA (site code 004091). Therefore it is essential – and a legal requirement under Habitats Directive²³ – that an assessment be undertaken.
- Under the Water Framework Directive, the Environment Protection Agency has given ‘A poor rating’ to the river network in this locality (i.e. rivers Dee & Gara). The Water Framework Directive should be taken into consideration in advance of a major construction on such a vulnerable area since this too is under a ‘reporting’ rule to the EU.
- The Irish Peatland Conservation Council’s frog survey shows that there is good wetland habitat present. Ireland has lost more than 50% of its amphibian wetlands in the last 100 years (Marnell, F.1997) and Ardee Bog is geographically important as it is one of the most easterly raised bogs in the country supporting this species.

- From an archaeological perspective it is possible that there are Neolithic Monuments located at the bog, query if proper consideration been given to the existing and undiscovered archaeological heritage of the region and any plans to protect same.
- In summer 2019 it was noted that Curlews had returned to Ardee Bog.

Details are provided regarding curlew population at Ardee Bog and in Ireland as a whole. It is stated that the Irish Curlew is listed as an ANNEX II section II bird species within the EU Birds Directive²⁷ and also has a national status of Red on the list of Birds of Conservation Concern in Ireland. The Curlew is the only Irish bird listed under threat of extinction by the International Union for Conservation of Nature (IUCN). There is currently a national initiative to protect the Curlew and the N52 Ardee Bypass should take proper measures to study the area and ensure the road is not detrimental to restoring important breeding habitat. There are guidelines for setback distances from breeding Curlew sites, it is expected that an adequate setback zone be determined if a road development goes ahead.

There have been sightings of other birds such as Snipe, Owl, Heron as well as other animals such as Irish Hare, Deer, Otters, Frogs, etc.

Under EU and Irish habitat law we are obliged to conduct an Environmental Impact Assessment.

Further Note to N52 Ardee Bypass: Bypassing the Wrong Part of Town

Traffic flows would indicate that a bypass is needed elsewhere. The worst traffic congestion is located on the southern approach from the N2. The N52 Ardee Bypass will only relieve traffic on the Kells Road, leaving the majority of the N2 traffic to continue converging on the tiny bridge and down Ardee's single main street. A bypass could arch South East instead.

Chief Executive's Response:

Ardee Bog is designated as a proposed Natural Heritage Area (pNHAs) and is included in the list of pNHAs in Louth in Table 8.3 of the Draft Plan. The process of designating a pNHA as a NHA falls under the Wildlife (Amendment) Act 2000. This is a process outside of the Development Plan.

There is an existing View identified for protection in the Townparks area of Ardee in the Draft Plan that relates to a View of Ardee Bog. This is View no.33 in Table 8.14 of the Draft Plan. It is apparent however that the numbering of the Views and Prospects on Map 8.16 needs to be updated to correlate with the List of Views and Prospects in Table 8.14.

A review of the road scheme will be undertaken in compliance with all necessary assessments and studies for the design of roads including Flood Risk Assessment, Screening for Appropriate Assessment and an Environmental Impact Assessment Report which will be assessed by An Bord Pleanála under the planning consent process.

Chief Executive's Recommendation :

Amend the numbering on the Maps in Table 8.16 and the List of Views and Prospects in Table 8.14 so they correlate.

Submission No.:

LCDP DR580

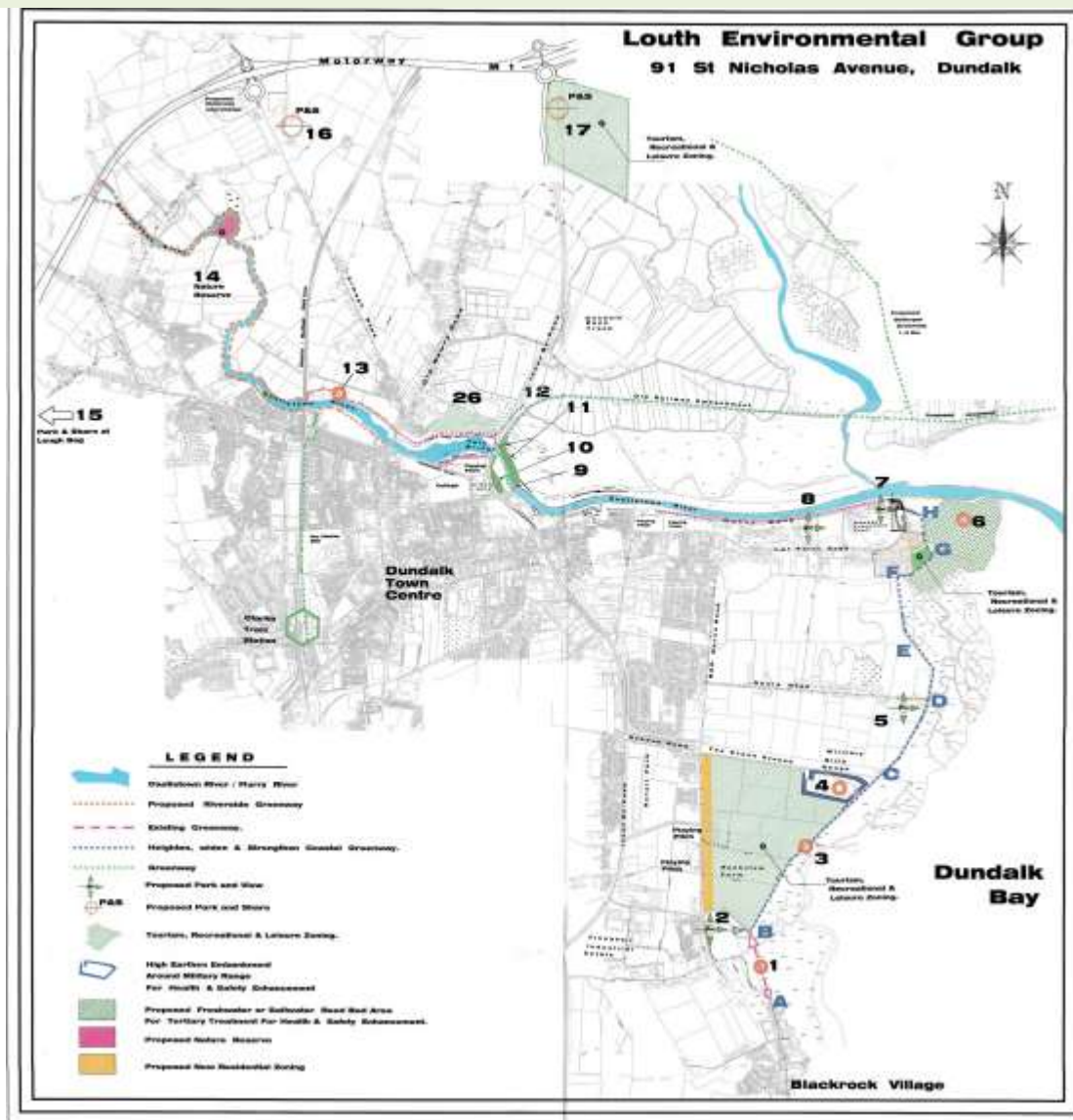
Submitted By

Louth Environmental Group

Theme (s):

Various Chapters/ Themes

Map showing lands subject to Submission:



Summary of Submission:

- Form new coastal greenway embankment from 'A' to 'B' on attached map.
- Provide new public carpark with pedestrian access at Blackrock Road to point 'B' on the coastal greenway adjacent to the Lord Limerick Embankment.
- Heighten, Widen and Strengthen the Coastal Greenway Embankment from point 'B' through 'C' - 'D' - 'E' - 'F' - 'G' & 'H', with expertly selected/sited camouflaged bird-watching hides.
- Enclose the military rifle range with a high earthen embankment with staggered overlap entrance (Calculate quantity of reusable soil/clay/rock required).
- Provide new public car park with pedestrian access at Shore Road to point 'D' on the coastal greenway.

- Create circa 40 acre reedbed for tertiary treatment of the Town sewage before final dispersal of tertiary treated effluent to Dundalk Bay; minimise Biological Oxygen Demand (BOD).
- Provide new public carpark with pedestrian access to the Navy Bank at Soldier's Point. (As per CRADBADA 'Park & View' Drawing.
- Provide new public carpark with pedestrian access to the Navy Bank at Suil Na Mara, adjacent to the former Quay Celtic Soccer Pitch.
- Provide new tidal flood risk mitigation infrastructure by way of the installation of a 4 metre Ordnance Datum Malin Headcrest level water retention utility at the western end of George's Quay (opposite the Spirit Store), with flap valve control system to retain water level of 13ft Ordnance Datum Poolbeg upstream and 22ft Ordnance Datum Poolbeg downstream, with pedestrian access across same to a coastal greenway on the northern embankment.
- Strengthen, enhance and further landscape to the existing St. Helena mini-forest and protect with Tree Protection Order (TPO) designation to militate against this mini-forest suffering a similar fate to Clark's Forest
- Construct a coastal greenway embankment on the northern side of the Castletown River estuary, opposite the St. Helena mini-forest, from the northern end of the new pedestrian river crossing and connecting to the Táin Park greenway by passing under the northern arch of the Táin Bridge at 2 metres headroom.
- Floodlight the Táin Bridge on each side to complement the 2 metre headroom pedestrian and cycling greenway under both the northern and the southern sides of the Táin Bridge, the northern one to connect to the existing greenway along the edge of the former landfill site on the northern bank of the Castletown River.
- Extend the existing St. Helena coastal greenway along the Fairgreen Road on the riverbed behind the Fairgreen river wall, to pass under the southern arch of the Newry Road Bridge, to link with the existing greenway from Maxwell's Row to the Great Northern Railway/Castletown River Bridge, and to pass through the southern archway of the Great Northern Railway (GNR) river bridge and continue past Woodview Crescent, Castleross, Saltown, Fatima and the recreational open space land between the Fatima housing estate and the Castletown River, to Toberona Bridge and the two M1 motorway bridges, this greenway feature to be duplicated on the northern bank of the Castletown River, passing through the northern arch of the Castletown River/Great Northern Railway river bridge.
- Turn the 'fisherman's island' into an inaccessible island as a nature reserve.
- Create 'Park & Share' public utility, with security cameras to minimise vandalism and theft, on the Castleblayney Road at the Lough Bog where up to 130 vehicles routinely park to share onward transport to Dublin during the working days of the week, in implementation of Government Climate Action Policy
- Designate Rockview Farm for 'Tourism, Leisure & Recreational' land use, with a strip of residential zoning along the Blackrock road edge of the land.
- Designate Strandfield farm for 'Tourism, Leisure & Recreational' land use.
- Amend the "Tourism & Leisure" land use matrix to include 'recreational and 'glamping' land use.

- Redefine the Town Core as being bounded by the section of Great Northern Railway from Clarke Station to the Castletown River Railway Bridge, the section of the Castletown River from the Castletown Railway Bridge to Dundalk Harbour and via Bothar Eiarrod (The new roadway on the former Greenore Railway/Barrack Street Goods Yard spur), to take in the Harbour and the County Hall/Government Offices/Swimming Pool Complex and back to the Ardee Road section of Clarke Railway Station, to include the removal of the Dublin Road Bridge and extending Bothar Eiarrod to the Ardee Road section of Clark Railway Station.
- Ascertain the peak surface drainage runoff of Balmer's Bog and design a drainage system to conduct this runoff to Dundalk Bay, probably via the Avenue Road/Long Avenue and The Green Avenue in augmentation of the capacity of the Rampart River and the Blackwater River.
- Calculate the existing residential density of the above redefined Town Core and calculate the desirable residential density and produce a Local Area Plan (LAP) to secure the desirable residential density, in accordance with the policy guidelines which are clearly set out in the Departments' December 2018 guidelines on sustainable urban growth.
- Designate the lands between St. Nicholas Avenue and the Castletown River for 'Waterfront, Town Centre Density, Carbon Neutral, Residential/Mixed Use', to improve Dundalk Town Core's extremely low residential density, in compliance with the Department's December 2018 guidelines.
- Prepare, in cooperation with relevant stakeholders, a Local Area Plan (LAP) for a regeneration and funding strategy for the Long Walk/Patrick St/Bridge St/Maxwell's Row/Linenhall Street area, complementing the existing Town Centre/Market Square/Clanbrassil Street/Church Street Regeneration Scheme.
- Provide greenway from the Great Northern Railway bridge/Castletown riverside greenway via Ice House Hill Park to Clarke railway station.
- Provide full M1 Motorway access/egress interchange at the Armagh Road (R177).
- Provide 'Park & Share' utilities adjacent to Junction 17 at the Lough Bog section of the N53 Castleblayney Road, ditto at Junction 18 Ballymascanlon interchange and ditto at the Armagh Road interchange.
- Designate the former Newry Road landfill site as playing pitches, running track and parkland, linked to the Táin Park/Riverside Greenway and prepare a Local Area Plan (LAP) for securing this objective.

Chief Executive's Response:

The contents of the submission are noted and a significant number of issues raised are considered to be very specific and as such fall outside the remit of the development plan which is a policy document that sets out the overall strategy of the council for the proper planning and sustainable development of an area consisting of a written statement and accompanying maps. The plan usually includes the broad aims of the council for specific topics, e.g. housing, infrastructure, community facilities which are reinforced by more detailed policies and objectives. The provision of car parks, motorway services, nature designations, flood lights etc. falls outside the remit of the County Development Plan.

Irish Water is responsible for the provision of a national and long term approach to the planning and development of our water services and as such it is not for the Council to consider the appropriateness or otherwise of a tertiary reed bed system to deal as a means of waste water treatment.

The draft County Development Plan acknowledges the importance of Greenways in the provision of a sustainable transport mode and as a recreational facility. The policies are considered robust.

Issues pertaining to flood risk have been dealt with in response to other submissions in particular the response to the OPW. The Dundalk Flood Relief Scheme is the most appropriate mechanism to deal with specific flood mitigation measures and it is not the role of the development plan to provide specific flood mitigation measures that may run counter to requirements of the CFRAMS project.

Section 13.19.2.3 recognises that certain uses may not be listed in the list of potential uses under particular land use zonings. The list of uses that are open for consideration is not intended to be exhaustive but rather provides guidance on types of acceptable uses. Each application will be considered on their individual merits and against the land use zoning objective for each land use category. Taking this into account it is not considered necessary to amend the land use zoning as proposed.

The draft County development plan is considered to provide sufficient protection to trees and woodlands of special amenity value.

The draft County Development plan seeks to consolidate town centres and the policies provided in the plan are considered robust to achieve this objective. Further, higher densities are also promoted in line with national policies.

Chief Executive's Recommendation :

No change

Submission No.:	LCDP DR583
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Submitted By	Miriam Mc Guill
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Theme (s):	General
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Summary of Submission:

Old centre of Dundalk is unique, various areas mentioned as well as the Victorian and Georgian architecture.

Strongly believe that high rise building should be avoided in the centre of Dundalk.

Old buildings should be preserved and only rebuild when absolutely necessary.

Modern buildings have no individual character.

Dundalk is special it should not be diluted or destroyed.

Dundalk town centre is a wonderful hub and a great place for tourism.

Chief Executive's Response:

The Draft Plan seeks to support investment and regeneration in settlements such as Dundalk that respects the built heritage of the town whilst also creating a modern, functional, attractive environment where people can live, work and socialise. Section 2.14.2 of the Plan makes reference to the Urban Design Framework carried out for Dundalk in 2008 and the 7 character areas identified. The recommendations in this Framework provide a strong platform for the future development of the town centre area.

One of the challenges in achieving compact growth is the integration of modern buildings within historic streetscapes. In this regard it is critical that any new development contributes to the creation of a sense of place whilst also respecting the historic character and identity of an area.

There is a strong set of policy objectives and guiding principles for development in town centres and urban areas set out in the Draft Plan and particularly in the Development Management Guidelines in Chapter 13 which seek to create an attractive, functional, and sustainable urban environment.

As part of the preparation of the Local Area Plan for Dundalk a more detailed examination of the growth strategy, key development areas, and urban design principles for the town will be carried out.

Chief Executive's Recommendation :

No Change

Submission No.:

LCDP DR601

Submitted By

Drogheda City Status Group

Theme (s):

General

Summary of Submission:

Background to Drogheda City Status Group provided.

Drogheda is the largest and fastest growing town in Ireland (Census 2016). Housing Completions in the Greater Drogheda area in Q2, 2020 were the largest outside Dublin. Drogheda is designated as a Regional Growth Centre; the creation of significant employment is a priority with a strong focus on reversing commuter effect.

There should be a local presence on the State job creation agencies including IDA, Enterprise Ireland LEO. Louth County Council (LCC) must collaborate with Meath County Council to resolve this issue.

A forum should be set up tasked with developing "An Action Plan for Local Jobs in Greater Drogheda". There should be a Strategic objective to address these matters.

Given the right supports at national, regional, county and local level, Drogheda has the potential to overtake Waterford as Ireland's fifth largest city and urban centre and a major centre of economic activity. This is acknowledged in Section 2.5.4 of the Louth Draft.

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. Reversing the commute for thousands of skilled individuals by supporting indigenous job creation and via IDA opportunities to attract FDI, will provide sustainable growth and will align with NPF and the RSES's.

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 indigenous businesses) which needs to be addressed as a matter of extreme urgency.

The draft CDP should capitalise on the opportunities presented by Drogheda's new-found status as a RGC. The Louth draft CDP does not reflect the opportunities this new status presents, Drogheda is playing catch up with other RGC's.

LCC should be 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.

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.

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.
- The Core Strategy and Housing Allocation seek to unnecessarily limit the growth of Drogheda, contrary to the objectives of National and Regional Planning Policies.
- Section 2.7 The County Plan should include implementation objectives relating to the Joint Unitary Local 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 Local Area Plan (LAP) for Drogheda..’ 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.

- 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.”
- 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 north side to the existing railway station.
- Chapter 6: The Louth Draft CDP omits to give primacy to Drogheda as a Fáilte Ireland designated tourism destination town. Drogheda needs to be promoted as the primary tourism destination in County Louth. Drogheda’s offerings are listed. Drogheda does not have a dedicated Tourism or Heritage Officer for the Drogheda and the South County area. Millmount is run by volunteers and receives no funding from LCC.
- 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 its future, it is probably one of the largest employers in the county.
- 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.
- Drogheda is the only RGC that doesn’t have a Third Level education facility/campus within its boundaries or even within 25kms of its boundaries.
- 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. 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.

Improving Drogheda’s Reputation

The Draft Plan has set out the key strengths of Drogheda as a place to live, work and invest. It is also recognised there are challenges with regard to unemployment, social exclusion, and anti-social behaviour. This Plan will seek to address these issues by promoting a co-ordinated and close working relationship between various stakeholders, community groups, and agencies, supporting investment in community facilities, and creating neighbourhoods where people can feel safe in an attractive and functional environment.

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. Drogheda needs to be resourced. 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 as a Regional Growth Centre

Growth of Drogheda needs to be promoted and supported due to its: RGC status (as per the NPF and RSES), location along the Belfast to Dublin Economic Corridor, planned Dart expansion, strong town centre, potential for employment growth, available workforce, excellent transport links, commercial port, proximity to Dublin and Drogheda Institute of Further Education (DIFE). It urgently needs a new IDA Park and LCC must utilise funding to leverage Drogheda's RGC status.

Comments on the LCC draft CDP versus Meath CDP.

Population: Setting population and dwelling caps on zoned land in a RGC, during a housing crisis is a barrier to investment.

Transport: The objective to prepare a local transport plan for Drogheda and East Meath, which is to be prepared in association with Louth County Council does not appear in Louth's Draft CDP.

Port Access Northern Cross Route (PANCR): The reference to PANCR in draft Louth CDP 2021-2027 fails to acknowledge the importance of the PANCR to the build out of North Drogheda for housing and the ability to attract investment. The Meath draft CDP clearly notes this. It is imperative that the PANCR is expedited IN FULL at the earliest opportunity, given the huge social, economic and environmental benefits it confers.

Cross Boundary Position:

The boundary of the LAP has not yet been defined, it needs to be in conjunction with additional strategic objective outlined above. No strategic objectives are set out in respect of the content of the LAP.

Land Use Zoning Map. The southern environs should be included on the land use zoning map.

Requested Changes to the Louth Draft CDP:

- 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.
- Remove cap on population growth and residential development
- Encourage Government to review, enhance and extend the "Living over the Shop" and enhance Drogheda's "Blue Flag" status.

- 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.
- 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.
- 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
- Chapter 6 Tourism - Designate Drogheda as the primary tourism destination and gateway destination for County Louth. 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.
- 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.
- LCC should provide a framework to support the delivery of a dedicated hospice facility in Drogheda in accordance with Policy Objective SC 37.
- A retirement village to be located in Drogheda, given its demographics and population.
- 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. We request that 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.

Chief Executive’s Response:

The designation of Drogheda as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in this Draft Development Plan.

This Draft Plan strongly supports the growth of Drogheda in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre and become a regional driver for economic activity.

Economic Development

Realising the enterprise and jobs potential of the County is a fundamental aspect of the Draft Plan. The designation of Drogheda as a Regional Growth Centre makes the town a priority for employment and economic investment.

The Council will continue to work closely with various stakeholders and agencies including the IDA and Enterprise Ireland in promoting and facilitating economic development in Drogheda. It is not considered that a specific 'Action Plan for Jobs' is required. The RSES and the North-East Regional Enterprise Plan provide a strong platform on which actions and policy relating to job creation and economic development can be based. As part of the preparation of the Joint Local Area Plan for Drogheda a more detailed examination of the economic policy for the town can be carried out, with associated policies set out.

Climate Change

Climate change is a cross-cutting theme of the Draft Plan that covers a broad range of issues including housing, travel, energy conservation and supply, and the environment. As part of the Joint LAP for Drogheda the climate related policy will be more specific to the town.

Vision

It is considered that the narrative for Drogheda in the Draft Plan is strong and highlights the strengths and opportunities for the town. The County Development Plan provides a context and overview for the key growth centres in the County. More detailed information specific to Drogheda will be set out in the Joint Local Area Plan.

Core Strategy

There is a requirement under the Planning and Development Act 2000 (as amended) to set out population and housing projections for each settlement. These projections are based on the figures provided in the NPF Implementation Roadmap and are consistent with national and regional policy.

Joint Local Area Plan

There is a strong narrative in the text of the Draft Plan supporting the preparation of the Joint Local Area Plan. This includes section 2.13.1. In addition policy objective CS 9 emphasises that the preparation of the Joint Plan is a priority.

Tier 1 Employment lands

The Infrastructure Assessment in Appendix 2 of Volume 3 identifies any significant infrastructure investment required in order to release the lands for development in the town. There are undeveloped employment lands within the town where the water and sewerage infrastructure is adjacent to the lands that any potential investor could connect into. In the majority of undeveloped lands in all settlements it is normal for piped services and utilities to be required to be brought to the lands. The Council will continue to work closely with infrastructure and utility providers including Irish Water, the NTA, and TII in identifying and progressing infrastructure investments that will facilitate economic growth and investment in the town.

Rail Station

Policy Objective MOV 14 in Chapter 7 refers to the provision of a new rail station in North Drogheda. However a submission from the NTA indicated that there are currently no plans for the provision of additional stations outside the scope of the DART+ programme.

Tourism

The Draft Plan identifies tourism as an important pillar in the County economy. There is considerable emphasis on the Boyne Valley and the designation of Drogheda as a Destination Town by Fáilte Ireland in Chapter 6. Further detail will be provided in the Joint Local Area Plan.

Regional Hospital

Section 4.12 'Healthcare Facilities' in Chapter 4 refers to Our Lady of Lourdes Hospital in Drogheda. Policy Objective SC37 supports the provision of health care facilities in the County.

LMETB Head Office

This issue would be outside the scope of the Development Plan. The focus of the Development Plan is on land use planning.

Third Level Education

The Draft Plan supports the continued expansion and development of Drogheda Institute of Further Education in policy objective SC32.

Louth County Council Offices

The headquarters of Louth County Council is in Dundalk with civic offices in Drogheda, Ardee and Dundalk. The staffing and operations of Council Offices is not a matter for the Development Plan.

Local Transport Plan

Section 7.4.1 'Local Transport Plans' in the Movement Chapter (Chapter 7) refers to the preparation of Local Transport Plans. This is supported by policy objective MOV 41.

PANCR

The importance of the PANCR is highlighted in sections 2.13.6 and 2.13.8 which are included within the written statement for Drogheda in Chapter 2.

Joint LAP

Section 2.13.1 indicates that the strategic objectives of the Draft Plan will inform the Joint Local Area Plan for Drogheda. This includes the policy objectives specific to Drogheda set out in section 2.13.9.

Land Use Zoning Map

A map for of the entire Joint Plan Area will be included in the Joint Local Area Plan for Drogheda.

Specific requests

In addition to the above items included in the submission there were also specific requests regarding the inclusion of policy objectives or identification of lands for certain uses. These issues will be addressed as part of the Joint Local Area Plan where there will be an opportunity to examine the issues in greater detail.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR620
Submitted By	Oriel Windfarm Ltd
Theme (s):	Chapter 10

Summary of Submission:

The inclusion of many of the policies of the national Climate Action Plan in the CDP which will enable County Louth to play its part in meeting our national goals for decarbonisation, are noted.

Background Information and projects are provided in relation to Oriel. It is stated that Oriel will be one of the first projects that can apply for development consent consideration under the new Marine Planning and Development Management (MPDM) legislation, once enacted.

Submissions to development Plan.

- SO 4 is supported.
- Oriel supports the renewable energy policies set out in the Infrastructure and Utilities Chapter and, in particular, the support for the development of offshore wind farms subject to normal planning considerations. Section 10.6 is noted.
- IU 55 is supported.
- IU 56 is supported, however, it should be noted that offshore wind farms require connection to the high voltage national transmission grid. In County Louth this existing grid infrastructure is set back approximately 20 km from the Louth coast with the requirement for underground cable connection to this infrastructure.
- IU 67 is welcomed
- Oriel also supports ENV 47 and 48
- The National Marine Spatial Plan has been implemented through the preparation of the National Marine Planning Framework and it is suggested that this Framework is referenced in this section.
- Oriel considers that the inclusion of a specific section on Climate Action in the 2021-2027 CDP and the adoption in 2019 of Louth County Council's Climate Change Adaptation Strategy (CCAS) strengthens the Plan. The inclusion of the targets from the national Climate Action Plan (CAP) into the CDP is welcomed and the table indicating how the policies within the CDP address the CAP targets is useful.

Chief Executive's Response:

The background information in relation to the company and its projects are noted as is recognition for inclusion in the Draft of many of the policies of the Climate Action Plan 2019.

Widespread support for both the strategic and policy objectives of the Plan in relation to Climate Action and renewable energy and in particular off shore wind energy is welcomed.

The Draft National Marine Planning Framework is referenced in both Chapter 11 and 5. It is specifically addressed within Section 5.10 in the context of Marine Opportunities including Ports. It is recommended that a cross reference should be inserted within the text of Section 11.5.2 to bring attention to this (in response to the submission from EMRA). In relation to IU 56 and the reference to undergrounding of cables please see response to Eirgrid Submission LCDP 463.

Chief Executive's Recommendation :

Recommended changes as per Submission Response LCDP 463
Insert cross reference into Section 11.5.2

Submission No.:	LCDP DR631
Submitted By	Carlingford Lough Heritage Trust
Theme (s):	Volume 2a

Summary of Submission:

Volume 2A, Appendix 1&2 1.Carlingford Chapter 4 /Page 14 Policies 1-16

- Carlingford Lough Heritage Trust requests that all policies CAR 1-16 be retained in the Plan 2021-2027 as all are relevant. CAR 16 is noted
- The Town Tennis Court Area is currently located in the old Medieval Port area which is required to be developed as part of the Rural Regeneration Project. An alternative site for the development of tennis courts was purchased adjacent to the Foy Community Centre. Carlingford Lough Heritage Trust requests that it is inserted in the plan that this site should be developed as the facility for the town tennis courts
- Carlingford Lough Heritage Trust requests that it is inserted in the Plan that a plan for Rural Regeneration in Carlingford needs to be developed.

Chief Executive's Response:

Volume 1, Chapter 2 of the Draft Plan identifies a settlement hierarchy for the County, wherein there are 5 Self Sustaining Towns identified (in accordance with the Settlement Hierarchy of the RSES). Volume 2, Section 1 consists of the Settlement Plans and Maps for the Five Self Sustaining Towns, of which Carlingford is one. In the interest of clarity and consistency a common approach was adopted in the format and layout of these plans due to their shared overarching growth strategy which will focus on driving investment in services, employment growth and infrastructure while balancing housing delivery, including consolidation of the core areas and delivery of compact growth.

With the Draft Plan sitting in a new national and regional hierarchy with new associated policy objectives, and the requirement for the Draft Plan to be compliant with same, there was a need to fully review the policy objectives of the current plan including those associated with the towns and villages. The new policy objectives for Carlingford are in accordance with the over-arching policy objectives of Volume 1 of the Draft Plan and serve to fulfil the objectives of its role as a Self-Sustaining Town.

Notwithstanding this, the majority of the previous policies in principle have been incorporated into the new Plan. However, CAR 16 has not been included as at this juncture it is not an objective of the Council to pursue the development of a bypass in Carlingford.

Louth County Council was awarded Category 2 funding in June 2020 under the Rural Regeneration and Development Fund (RRDF) to support the project development of 'Living in Carlingford – Visiting Carlingford – A Strategy for Sustainable Tourism'.

The issues raised will be considered during the preparation of the Carlingford Project comprises 5 main components that are interlinked and reinforce each other; and are outlined in this document.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR637
Submitted By	John Bayly
Theme (s):	General

Summary of Submission:

Areas requiring further consideration:

- Promoting Higher Density in Drogheda and Dundalk.

The infrastructure in Drogheda is not sufficient for its current housing requirements and will be further strangled with the current approved housing on either side of the river. A proper access route to Drogheda Port is required. The access to public transport and particularly Rail and major bus is not an option for people living in the Sandpit, Termonfeckin and Clogherhead areas.

The current planning in relation to "High Density" does not address the requirements for Children or Teenagers to grow up in a "healthy" environment. The reduction in green space requirements can lead to anti-social behaviour. A review of outdoor parks and facilities need to be carried out.

- Rural Housing Policy

The proposed guidelines for rural housing is not very well considered and needs to be remain in its current regime. People are not attached to their "house" but are primarily attached to their location. The proposed qualifying criteria will lead to death of rural areas.

The "exclusion" essentially of 1 off housing to new members of the community who want to invest significantly in a rural area is wrong. A more structured policy to allow people remain in an area by "down-sizing" etc. should be considered.

Encourage the inclusion of Greenways and provision of facilities such as coffee shops and children's play grounds.

Chief Executive's Response:

Drogheda is a designated Regional Growth Centre in the RSES. The town benefits from a strong economic base, a wide range of services and amenities, and a strategic location along the Dublin-Belfast Economic Corridor. Taking account of the Regional Growth Centre designation in the RSES in addition to the development potential of the town, the Draft Plan has identified Drogheda for significant growth during this Plan.

It is also recognised that infrastructure investment is required to facilitate this growth. One of the critical pieces of infrastructure is the progression of the Port Access Northern Cross Route which would have the dual benefit of removing port related traffic from the town centre whilst also releasing residential lands in the Northern Environs of the town for development. The progression of this project is a fundamental element of the future growth strategy for Drogheda.

In relation to residential densities national policy requires the creation of more compact settlements and therefore requires higher densities, particularly in larger settlements such as Drogheda. Density is only one aspect of design. The Draft Plan promotes the creation of quality urban environments, which requires a co-ordinated and integrated approach to urban design and the creation of high quality open spaces. This is set out in detail in chapter 3 of the Draft Plan.

It is acknowledged that in smaller settlements public transport provision and accessibility is at a much lower level than in larger settlements. The National Transport Authority is currently preparing a Rural Mobility Plan 'Connecting Ireland', which will seek to increase connectivity and improve mobility in rural areas. The Council will be engaging and working alongside the NTA in the provision of this Plan where it relates to Louth.

In regard to the rural issues raised in the submission please refer to Rural Policy General – Composite Response.

The support for the provision of greenways is welcomed. Consideration can be given to the associated facilities such as coffee shops along greenways on a case by case basis. Such developments would be required to comply with the relevant planning and environmental criteria.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR668
Submitted By	Anna McKenna
Theme (s):	Chapter 2, Chapter 6 and Chapter 9

Summary of Submission:

The draft Plan should recognise the history and heritage of Drogheda and its environs including the UNESCO World Heritage site.

Additional resources are required to enable appointment of locally based heritage Officer and tourism/ visitor officer and to assist with the running of the Drogheda Tourist Office and Millmount Museum.

Submission lists 17no. tourist attractions within the area.

Chief Executive's Response:

The Draft Plan recognises both the heritage and history of Drogheda and its environs including the UNESCO World Heritage Site. Specifically in relation to Drogheda town both narrative and policy objectives support the principles and implementation of the 'Framework Plan for the Heritage Quarter of Drogheda' which aims to enhance and protect the qualities of the Heritage Quarter and guide and enable development in a managed way (Section 2.13.2 and SS 8). Archaeological sites and monuments pertaining to Drogheda are protected by inclusion of Policy Objectives as are all Protected Structures, ACAs and Historic Gardens and Designed Landscapes. The UNESCO World Heritage Site and its Outstanding Universal Value is addressed in Sections 9.3.4.a and 9.3.5 and supported in policy objectives BHC 9-BHC13. Further specific issues in relation to Drogheda may be raised/addressed in the forthcoming Drogheda Joint LAP being prepared by LCC in conjunction with MCC.

Operational issues regarding the museum and the tourist office are outside the remit of the Development Plan.

The tourist sites referenced are noted. Some of these sites are identified and protected in the Draft Plan in recognition of their built heritage.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR685
Submitted By	McCutcheon Hailey on behalf of Doyle Shipping Group
Theme (s):	Land Use Zoning Greenore Chapters 5, 9

Summary of Submission:

Background to Greenore Port Provided

Policy Context: An overview of the National Ports Policy has been undertaken.

Vision: A vision document has been produced setting out the ports future development strategy, this is in compliance with TC 41 of the Draft Louth CDP 2015-2021.

Heritage: The company are committed to their responsibilities as stewards of the Protected Structures located within the port's landholding, Built Heritage Strategy was prepared. A programme of rehabilitation work is underway.

Employment: The Port is a significant employer in Greenore and the wider region of the Cooley Peninsula, with over 90% of the Port's employees living within 12km of the Port.

Draft Louth County Development Plan 2021-2027

a. Zoning

The port distinguishes Greenore from other Level 5 settlements, in order to facilitate future development it is recommended to:

Include a zoning objective 'Port/Port related Activity' on Map 5.10 of the draft Development Plan for all lands associated with Greenore Port

b. Port Related Policies

With regard to EE26, masterplan's generally encompass a 20-40 year timeframe. Greenore Port is privately owned and it does not have access to this EU grant aid to produce a masterplan. The Vision Document prepared is for a 5 year timeframe. It is recommended that EE 26 is amended as follows:

"To recognise that the Port facilities at Drogheda, Greenore, Dundalk, and Clogherhead are an important economic resource and to support any improvements or expansion to these Port facilities at Drogheda, Greenore and Clogherhead and the consolidation of Dundalk Port, subject to the preparation of a Master Plan with the timeframe of same to be agreed with the Planning Authority and appropriate environmental considerations".

- c. Over the period 2015-2019, the throughput at Drogheda Port has increased by approx. 77% and Greenore Port has increased by approx. 40%. This highlights the significance that both ports have within the County.

Recommendation: In order for all ports in the County to deliver on national and regional planning objectives, it is essential that the Development Plan recognises the role of each port. Accordingly, it is submitted that a specific policy similar to SS9 and EE34 be included for Greenore Port.

d. Heritage Policies

Request that the Development Plan acknowledges the village's connection with the port and heritage objectives are balanced

Recommendation: It is important that the forthcoming Development Plan recognises the need for balance between these conflicting objectives and, if possible, that it identifies principles as to how such conflicts can be reconciled.

Submission includes Built Heritage Strategy and Greenore Port Vision 2021.

Chief Executive's Response:

The Draft Plan recognises the importance of ports in enabling economic growth and providing international connectivity, with specific references made to Greenore Port in both the narrative and associated policy objectives. Whilst the merits of including a land use zoning are recognised, there are no land use zonings included for any of the Level 5 settlements in the Draft Plan. It is considered that there is sufficient context and supporting policy objectives in the Draft Plan for any future development proposals at Greenore Port to be assessed.

Policy objective EE26 does not specify a time period which the Master Plans for Greenore Drogheda, or Dundalk Ports will cover. It is anticipated that this would be agreed as part of the preparation of any Master Plan. It is not considered necessary to specify this in the policy objective however additional text could be inserted into section 5.10 'Marine Opportunities including Ports' dealing with this issue.

With regard to the role of Greenore Port, it is considered that section 5.10 of the Draft Plan provides a strong narrative on the importance of Greenore Port to the economic growth and development of the County. This narrative is supported by policy objective EE26. It is not considered necessary to include a specific policy objective for Greenore Port as this would result in repetition. Whilst it is acknowledged there are specific policy objectives relating to Dundalk and Greenore Ports this is provided in the context of them being Regional Growth Centres, with these policy objectives providing the framework for the Urban Area Plans for these settlements.

It is recognised that there are challenges in operating a commercial port in an area rich in architectural heritage. As indicated in this submission, it is important that any development of the Port has cognisance of, and respects the character of, the surrounding area. It is considered that there is sufficient guidance and policy context within Chapters 5, 9, and 13 of the Draft Plan that would support the development of the Port whilst also ensuring that any development would be sensitive to the surrounding environment. As part of the response to submission no.709 it is recommended to include an additional policy objective that supports the protection of the built heritage in the County whilst also supporting economic renewal and sustainable development.

Chief Executive's Recommendation :

Port related land use zoning - No change

Policy Objective EE26 - No change

Additional Policy Objective relating to Greenore Port - No change

Additional text/Heritage Policy Objectives relating to Greenore Port - No change

Submission No.:	LCDP DR693
Submitted By	Keep Ireland Open
Theme (s):	General
Summary of Submission:	

This submission is 58 pages long. It provides a detailed comparison of the Draft County Development Plan with other Development Plans across the country.

The submission extracts wording and policies from other County Development Plans and recommends they are included in the Draft Plan. There are also suggestions that various sections are relocated to different chapters for example the section on Burial Grounds in Chapter 4 should be relocated to Chapter 9 Built Heritage and Culture.

It is also suggested that the Development Management Guidelines are included at the end of each chapter rather than being in a specific chapter.

The issues raised include the following:

- Additional sections on the following sectors: agriculture, forestry, commercial developments in the countryside, the extractive industry, and public rights of way. Policy and text from other Plans was recommended.
- Additional policy objectives in the Tourism chapter were recommended (extracted from other Plans)
- Replacement text and additional policy objectives in the Movement Chapter relating to walking and cycling (extracted from other Plans), Greenways, and Public Rights of Way (emphasis on the requirement to list the Public Rights of Way)
- Additional policy objectives in Chapter 8 (Natural Heritage, Biodiversity and Green Infrastructure) relating to the preparation of a Heritage Plan, European 2000 sites, sites of Geological Interest, Landscape Character Assessment, open/unfenced landscapes, trees, woodlands, and hedgerows, the insertion of an additional subsection on inland waterways, national parks, peatlands, and holy rocks and wells (policy objectives and text extracted from other plans)
- Chapter 9 – Built Heritage and Culture – archaeology should be included in the title of the chapter, replacement of policy objectives relating to zones of archaeological potential, additional text and policy objectives in section on the UNESCO World Heritage Site (policy objectives and text extracted from other plans)
- Chapter 10 Infrastructure and Utilities – relocate policy objective IU23 to chapter 8, title of section 10.4 should be ‘Telecommunications’ rather than ‘Communications’, additional policy objectives on public rights of way to telecommunications, additional policy objectives on renewable energy, wind energy – inclusion of a map indicating suitability of area for wind energy development including unsuitable areas in adjoining counties, additional policy objectives on wind and solar energy, hydro energy – amend IU64 to delete the reference to lakes as there are no lakes in the County and include additional policy objectives, additional text and policy objectives relating to small scale renewable electricity generation Site (policy objectives and text extracted from other plans)

- Chapter 11 – Environment, Natural Resources, and the Coast – amendment to section titles and additional policy objectives (policy objectives and text extracted from other plans)

Chief Executive's Response:

This is an extensive submission dealing with a wide range of issues relating to various chapters of the Draft Plan. The submission proposes additional text or the re-phrasing of policy objectives. Much of this text and the proposed additional policies and objectives have been extrapolated from other Development Plans throughout Ireland.

As part of the preparation of the Draft Plan existing policies were reviewed and updated in line with national and regional policy. Development Plans from other Local Authorities were reviewed where applicable. The Development Plan Guidelines (2007) were also consulted with regard to format, structure, and content.

Whilst the proposed additional text and associated policies and objectives have been reviewed, it is considered that the narrative and associated policy objectives in the Draft Plan provide sufficient background information, context, and policy platform to guide, support, and facilitate development proposals, in addition to protecting the environmental and built assets of the County. There are broad similarities between the proposed text and policies and objectives included in the submission to that set out in the Draft Plan and therefore it is not considered that the changes are necessary as it would not result in a change in the policy direction of the Draft Plan.

There is a strong emphasis in the submission in relation to walking and cycling. Much of the information proposed to be included e.g. details of walking and cycling trails and employing a walks and cycling officer are outside of the Development Plan. Such information can be provided in other publications separate to the Development Plan.

With regard to public rights of way policy objective MOV 50 highlights the intention of the Council to commence the process of mapping and listing public rights of way during the lifetime of the Plan.

In relation to the formatting and structure/layout of the Draft Plan it is considered that the each subject has been appropriately located in each chapter that will make the Draft Plan as easy to navigate as possible. It is considered a single chapter on Development Management Guidelines is more appropriate than this guidance being dispersed throughout the Draft Plan.

It is considered that there is a strong emphasis on climate change, sustainable transport, and environmental protection that will ensure the Strategic Objectives of the Plan can be achieved on a sustainable platform and therefore there are No Changes required based on the issues raised in this submission.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR709
Submitted By	Greenore Residents and Tidy Towns Limited
Theme (s):	Chapter 5, 8, 9, 10 Appendix 11 Views RPS
Summary of Submission:	

Background Information

Hope that Draft Louth County Development Plan will translate to the true meaning of sustainable development. Welcomes references to Greenore as a railway village in chapter 9 and a rural village in Volume 2.

The following is requested:

1. Overarching policy added to Chapter 9 to Protect and Promote the Architectural and Archaeological Heritage of the County and that all other policies which could impact negatively on the Built Heritage of the County refer to Chapter 9.
2. In Appendix 11 in relation to 15 - Greenore ACA a commitment to engage a Grade I Conservation Architect to carry out an Architectural Character Appraisal of Greenore ACA within the lifetime of the plan is added to the policies of Chapter 9 Built Heritage and Culture.
3. Insert a policy acknowledging the historic origins of Greenore and the Victorian engineering and architectural design and require that all new industrial / port development have regard to the design and quality of this unique setting and architectural style and must not detract from the existing character of the ACA.
4. The view north along Anglesey Terrace is added to the Views in 15.4
5. The policy objectives are strengthened in 15.4 to protect the architectural quality of Greenore.
6. A policy requiring that all works to the public realm, infrastructure or drainage, street lighting or sub-stations whether carried out by private developers, utility companies, statutory undertakers, the Local Authority, or for it by subcontractors is carried out in a manner and materials appropriate to the architectural and historic public realm. All works shall be designed and supervised by a Conservation Architect or Landscape Architect specialising in historic public realm.
7. The record of Protected Structure LHS 009 -001 is more detailed to include all the remaining fragments of Greenore Railway Station which are within the curtilage of the Railway Station Water Towers.
8. The R175 to Greenore, The Shore Road, Anglesey Terrace and Euston Street are all added to the list of Scenic Routes (Table 8.19) in Chapter 8 Natural Heritage, Biodiversity and Green Infrastructure.

9. The Scots Pine /Scotch Pine (*Pinus sylvestris*) trees on Greenore Golf Course on the approach to Greenore are added to the Table 8.10: Trees and Woodlands of Special Amenity Value in County-Louth and are considered for Tree Protection Orders under Policy Objective NBG 30 To protect trees and woodlands of special amenity value. Review and where appropriate make Tree Preservation Order(s) in relation to trees of special amenity value.
10. More inter-connectivity and cross-cutting themes between the policy objectives in different chapters (chapters listed).
11. Implementation audit is carried out to assess the impact of existing policies on Greenore as a Rural Village and an Architectural Conservation Area.
12. EE25 and EE26 are amended to fully incorporate the objectives of sustainable development, to ensure that the air, marine environment and the residents of Greenore are given equal due regard in any development management decisions, as is required when implementing sustainable development.
13. Greenore Port are required to comply with all relevant statutory environmental requirements and that Louth County Council fulfils their role in ensuring this compliance and take all necessary enforcement action when they do not and require Greenore Port to carry out all necessary remediation action as required.
14. A policy is inserted into Chapter 10 to cross reference with the Built Heritage policies in Chapter 9 and that all flood protection measures proposed are compatible with the architectural heritage, natural scenic beauty and designated sites SACs, SPAs, NHAs and pNHAs.
15. Adequate and appropriate engagement and collaboration with the residents of Greenore in the design of any proposed flood prevention measures.

Chief Executive's Response:

1. It is considered appropriate that an overarching policy objective seeking the protection of the archaeological and architectural heritage is included at the outset of Chapter 9.
2. The Draft Plan acknowledges the importance of and contribution made by Architectural Conservation Areas and in recognition of this there are a total of 36 designated ACAs in County Louth. During the lifetime of the Development Plan it is intended that there will be more ACA Character appraisals carried out, however it is not intended to specify the locations.
3. Additional text can be included in Section 15, Appendix 11 in relation to Greenore.
4. The views as identified in the ACA are sufficient.
5. The objectives listed in 15.5 regarding the Greenore ACA include preservation of the village and its setting where development complements the character of the village and does not diminish its distinctiveness of place, preservation of the historic street pattern and traditional elements etc. These are further supported by the policy objective as provided for in Chapter 9 of the Plan as they relate to the architectural built heritage.

6. The Draft Plan provides a narrative, policy context and guidance regarding ACA's within County Louth. Narrative and policy context are detailed in Section 9.6.1 (BHC 26-32) while guidance includes: Guidelines for Works in ACA's, A Guide to ACA's in Louth and Development Management Guidelines for ACA's which are detailed in Appendices in Volume 3. The Draft Plan, through Policy also seeks to ensure that any new service infrastructure will not be detrimental to the character of the ACA while objective 5 of the ACA seeks the use of appropriate materials, street furniture and lighting in any public development of the area.
7. A Protected Structure in accordance with the Planning and Development Act 2000 (as amended) includes for the land lying within its curtilage and any other structure and their interiors lying within the curtilage.
8. There are currently no proposals for the inclusion of Greenore within the Scenic Route listing.
9. The Draft Plan recognises that trees and in particular groups of trees are an important component of the local landscape and townscape and in this regard, their protection is promoted. Policy Objective NBG 32 of the Draft Plan provides for the investigation, identification and addition of suitable trees and woodlands of special amenity value during the lifetime of the Development Plan. In the absence of any investigation and analysis of these trees it is not appropriate for their inclusion at this stage of the Draft Plan but the opportunity does exist for inclusion at a later date. Regarding Trees and Woodlands of Special Amenity Value, Policy Objective NBG 29 and NBG 30 seek to review and where appropriate make additional trees preservation orders in relation to trees of special amenity value.
10. All applications received throughout the County are considered and assessed in a holistic manner taking account of all policy objectives within the Plan as applicable. Developments are not considered in silos but rather in the whole ensuring full consideration of inter-connectivity and cross cutting themes. Notwithstanding this, the benefits of cross-referencing in the Plan are acknowledged and the Council will endeavour to include cross-referencing in the Plan where possible.
11. Resources would not be available for the Forward Planning Team to carry out a specific audit for Greenore as requested. There will be a Two Year Progress Report prepared setting out the progress in achieving/securing objectives in the Development Plan.
12. It is recognised that there are challenges in operating a commercial port in an area rich in architectural heritage. As indicated in this submission, it is important that any development of the Port has cognisance of, and respects the character of the surrounding area. It is considered that there is sufficient guidance and policy context within Chapters 5, 9, and 13 of the Draft Plan that would support the development of the Port whilst also ensuring that any development would be sensitive to the surrounding environment. As per issues raised in item 1 above, it is recommended to include an additional policy objective that supports the protection of the built heritage in the County whilst also supporting economic renewal and sustainable development.

See also response to submission no.685.

Taking account of the fact that additional guidance will be included in the Development Management Chapter it is not considered necessary to amend policy objectives EE and 26 as proposed.

13. The legal requirement for Greenore Port to comply with statutory planning or environmental requirements does not need to be stated as it is covered under legislation. In addition Planning Enforcement is separate to the Development Plan.
14. & 15. Engagement and collaboration with the residents of Greenore in the design of the proposed flood prevention measures lies outside the scope of the Development Plan. It will be subject to separate consultation with relevant stakeholders and members of the public throughout the delivery of the Flood Relief Projects to inform the identification of Flood Defence Options which will then have to comply with Planning and Environmental Consents.

Chief Executive's Recommendation :

1.

Include new policy objective under Section 9.2 to read as follows:

'To protect the built heritage assets of the county and ensure they are managed and preserved in a manner that does not adversely impact on the intrinsic value of these assets whilst supporting economic renewal and sustainable development.'

3.

Additional text to be included in Appendix 11, Section 15. 1 and 15.2 as follows:

15.1 Historical Development of the Area

The village was planned, designed and purpose-built in a previously isolated, rural location in the second half of the nineteenth century by the London North-West Railway company to provide it with a direct route to Ireland, midway between the major ports of Dublin and Belfast. The harbour complex, pier and railway station were designed by James Barton, a pupil of John MacNeill – engineer for the Great Northern Railway line. The railway company was responsible for building the port for its ferries and railway lines to connect to the Irish rail system in addition to a hotel, houses for staff and a school for the children and laterally, in the 1890's a golf course and bungalows for its officers.

15.2 Character

Although Greenore ceased to operate as a passenger port in 1952 the remarkable group of buildings survives in an almost complete state, the major casualty of recent years being the hotel. The heart of the village is home to many Protected Structures and consists of a double-sided street, of two storey, former railway workers houses built approximately 1872/1873, of local, grey, Carboniferous limestone with yellow English brick reveals called Euston Street. Farther west is Anglesey Terrace with its houses overlooking the Golf Course. South of the village are the fine houses, referred to as the 'bungalows' originally for the managerial elite of the railway and port company. These Arts and Crafts inspired houses which were built by the Great Northern Railway architect MA Mills form a marked contrast with the typical architecture of the village.

Greenore is an outstanding example of a purpose-built, English-style industrial village in a coastal setting. ~~The stone and brick terraces of Euston Street, brick schoolhouse and timber frame bungalows are one of the finest groupings in Ireland.~~

10. The Council will endeavour to include cross-referencing in the Plan where possible.

11. No Change

Submission No.:	LCDP DR725
Submitted By	Mark Dearey
Theme (s):	Chapters 2, 3, 8, 12, 13
Summary of Submission:	

1. Addition to CS 5 (bold):
To support the implementation of the EU Green Deal, National Climate Action Plan 2019, Programme for Government 2020, Climate Action and Low Carbon Development Action Bill 2020 Climate Change Adaptation Strategy for Louth and the Climate Action Charter through the Draft County Development Plan and to consider, if appropriate, a variation of the development plan to ensure the consistency with the approach to climate action recommended in any revised Development Plan Guidelines as adopted.
2. Support for CS 16
3. Remove SS 26, the Urban Framework contradicts new policy objectives driven by the Compact Growth and the stated objective of Chapter 12 CS5.
4. Chapter 3 Hou 40. 2 zone system has resulted in highly protected areas now enjoying reduced protection. No development zones should be clearly identified and in particular should apply above certain contour lines in the Cooley uplands, close to pNHA sites and along certain coastal zones. A reference to no development zones could be inserted in HOU 40 and developed further in development management section.
5. Ardee Bog be identified as an NHA candidate, designated a Raised Bog for conservation and rewetting and that the Local Authority work with local landowners and stakeholders to achieve agreement on and fulfil the objective. This is supported by NBG 21 and 22
6. Ardee Bog from local road L5232 be designated a Protected View. This is supported by NBG21 and 22.
7. Chapter 12: CS 5 is welcomed.
8. There needs to be commitment to set targets in Chapter 13 to setting targets to 2030 not 2050.

Chief Executive's Response:

1. The Climate Action and Low Carbon Development (Amendment) Bill 2020 has yet to be passed as legislation. In addition there will be a legislative requirement to comply with the various aspects of this legislation when it is passed. It is therefore not considered necessary to include a reference to this in the policy objective as suggested.
2. Support for Policy Objective CS 16 is noted and welcomed.
3. The Urban Design Framework Plan (UDFP) as referenced and supported in SS 26 provides a platform for future development of Dundalk Town, concentrated on the identification of Character Areas which are based on their historic, economic or architectural form with accompanying recommendations. These recommendations provide a robust framework for the long term future development of the town centre area and indeed have been the basis for recent successful investments in the town's public realm. The UDFP will not prejudice or compromise implementation of national, regional and local policy to support and promote compact growth and consolidation of town centres as provided for in Policy Objectives CS 2 and in policy objectives which support high density sustainable development and increased building heights in appropriate locations and advocated in SS 4, SS 5, SS21 and SS22.
4. The Council is satisfied that HOU 40 provides strong protection for sensitive landscapes in Rural Policy Zone 1. It is considered that the narrative, policy objectives and qualifying criteria in Chapter 3 and guidelines in Chapter 13 will ensure these landscapes are appropriately protected. See Rural Policy General – Composite Response for further details regarding the rural housing policy.
5. Wildlife sites of national importance including both ecological and geological sites are designated as Natural Heritage Areas under the Wildlife (Amendment) Act 2000. Sites identified but not yet designated are known as 'proposed Natural Heritage Areas' (pNHAs) which are protected from development only by inclusion in the Development Plan. The National Parks and Wildlife Service proposed 24 ecological Natural Heritage Areas in Louth, wherein Ardee Cutaway Bog is identified as NH1454. The process of designation is ongoing by the NPWS and it is anticipated that during the lifetime of the Development Plan that one or more pNHA will be fully designated.
6. There is a VP identified at Townparks, Ardee in the vicinity of Ardee Bog. However, the VP listed is incorrect and this shall be corrected.
7. Support for CS 5 in Chapter 12 is noted and welcomed.
8. This year has been selected based on consistency with EU policy and the national Climate Action Plan 2019 which has a net zero target by 2050.

Chief Executive's Recommendation :

1. **Correct numbering of VPs on Map 8.16**
Rename VP 34 from Funshog to Anaglog on Table 8.14 and Appendix 7.

Submission No.:	LCDP DR747
Submitted By	Love Drogheda Business Improvement District
Theme (s):	Zoning Map Drogheda Masterplan Chapters 5, 7, 13
Summary of Submission:	

Appropriate Zoning of Employment Lands

Background Information: Draft County Development Plan indicates the two main employment centres in the County as Drogheda and Dundalk, both are RGC's Statistics outlined. Prior to Covid-19 there was strong interdependency between Drogheda and Dublin. Drogheda has a Work Force ratio of 0.76. The town is experiencing residential growth without the necessary employment growth to allow it to develop sustainability. With ongoing contraction of the retail sector Drogheda is likely to lose more jobs.

The following is requested to be considered:

- LCC consider increasing appropriate zoning of Serviced Employment Lands to assist in giving Drogheda an equal opportunity of capturing FDI and increasing opportunities for indigenous growth of Drogheda Based companies that may wish to increase their size and scale as per Policy Objective EE 14& 15. These should be of 'international quality' as per EE41
- A balanced view in relation to zoning of employment lands is taken across the county
- Section 5.12.5 refers to employment areas in the southern environs having limited success in attracting investment, the IDA Business and Technology Park is now being utilised by Amazon Data Centre.
- It is also requested that the Local Enterprise Office increase its presence in Drogheda, that the establishment of a One Stop Shop for Drogheda is prioritised to help show case opportunity sites for potential investors and FDI clients.

Connectivity

Boyne river is one of the key assets of the town and integrate to drive status as Fáilte Ireland Tourism Destination Town.

The following is requested:

- It is requested that Louth County Council develop a new waterfront and riverfront regeneration master plan. The various aspect of the master plan are outlined
- Creative greening of the town centre to be permitted.

Infrastructure (PANCR)

Benefits of PANCR are outlined.

The following is requested:

- LCC vigorously peruse the PANCR project to open development lands and assist with planned growth of town.

Implementation of Westgate Vision & Town centre Heritage

It is requested that:

- LCC proceed with implementation of the West Gate Vision to help create a new quarter in the town centre
- Town Centre Renewal Plans alongside a Place making Strategy to be included as policy objectives in accordance with RPO 6.12 of the RSES's.
- Within the Town Centre Renewal Plan for Drogheda a Town Centre First Policy is taken in terms of sequential planning policy focus and priority be on town centre regeneration
- Laurence Gate should be properly preserved with signage, historic information and access to enhance the visitor experience.

Lighting Strategy for Drogheda

It is requested that

- Louth County Council investigate the creation of a town centre Lighting and Illumination Strategy and master plan, example provided. This would enable illumination of town's historic sites and bridges and would be attractive to visitor and town centre users alike.

Monitoring of vacancy rates

It is requested that

- Vacancy rates are monitored across all towns in the county, if rates are above 13-15% action should be taken.
- Consideration given to rezoning areas that no longer perform as originally planned.

Assist in the development of a Town Centre Living Policy for County Louth

It is requested that

- A town centre living strategy is devised.
- Formulate a strategic development plan for Louth existing and possibility future BID.

Water Services

- Irish Water are responsible for the provision of wastewater treatment however LCC are responsible for ensuring there is enough provision to allow orderly development as per IU 2 and IU3. South Louth's water capacity is running low or at capacity this could prohibit development.

Smart tools and requirements for Drogheda.

- Louth seek to apply SMART city tools and principles for the future development of Drogheda.

Town Centre Frontages

- Seek continued support for Shop Front Grant initiative and that LCC continue to ensure that shop front design is in accordance with regulations.
- Seek removal of inappropriate signage in conservation areas.

Chief Executive's Response:

The designation of Drogheda as a Regional Growth Centre in the NPF and RSES makes the town a focal point for population, residential, and economic growth in this Draft Development Plan.

This Draft Plan strongly supports the growth of Drogheda in a manner that will enable the town fulfil its potential and designation as a Regional Growth Centre and become a regional driver for economic activity.

Economic Development and Employment Lands

The Draft Plan has identified a significant land bank of employment generating lands in Drogheda. These lands will have the capacity to facilitate a wide range of economic and employment related uses. The Council will continue to work closely with the IDA in relation to identifying potential opportunities for multi-national and foreign direct investment in Drogheda and Enterprise Ireland in supporting and facilitating the growth and development of indigenous industry.

The reference to the increased presence of Enterprise Ireland in Drogheda and the development of a 'One Stop Shop' is noted however these issues would not fall within the scope of the Development Plan.

Connectivity

It is agreed that the River Boyne is an important asset to the town that adds to its identity and sense of place. There are opportunities to further integrate the river into the fabric of the town by investing in footpaths and cycleways along the riverfront. In addition the Docklands area of the town has been identified as an area for regeneration potential through the creation of a new urban quarter on both sides of the river.

PANCR

The Draft Plan highlights the importance of the PANCR as a critical piece of infrastructure in the future growth and development of Drogheda and supports the progression of this project during the life of this Plan.

Westgate Vision

The support given to the progression and implementation of the Westgate Vision in the submission is welcomed. This is a key project in the regeneration of the Westgate area of Drogheda.

Section 5.24 of the Draft Plan provides details of the 'Town Centre First Approach' and sets out the Councils support for town centres in a changing retail environment.

Lighting Strategy

This may be something that can be prepared as a tourism initiative outside the Development Plan process.

Monitoring of Vacancy Rates

Vacancy is one of a number of important indicators as to how areas are performing (or underperforming) and is an important part of the evidence base in policy formulation. There will be a detailed examination of vacancy in Drogheda as part of the preparation of the Joint Local Area Plan which will be periodically updated as part of the implementation of the Plan.

Town Centre Living Policy

Section 3.7 'Town Centre Living' provides a strong narrative on the changing role of town centres and the opportunities to promote town centre living as part of a multi-dimensional strategy for reinvigorating town centres. This is supported by policy objective HOU 11. Further detail on this topic will be provided in the Joint Local Area Plan.

Water Services

The Council will continue to work closely with Irish Water in addressing any deficiencies in the water supply and distribution network and waste water treatment and network. The potential solutions and recommendations to any deficiencies in the water supply will be set out in the National Water Resources Plan which is currently being prepared by Irish Water.

Smart City Tools

Policy objective EE31 supports the development of Smart City Programmes in the Regional Growth Centres. This will be examined in greater detail as part of the preparation of the Local Area Plans.

Signage

This Plan will continue to support the implementation of the Shop front Design Guidelines published by the Council. The Shop Front Grant Initiative does not come within the scope of the Development Plan.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR757
Submitted By	Drogheda and District Chamber
Theme (s):	Chapters 2, 5, 6 Appendix 2, 3 and 4

Summary of Submission:

Background provided including length of time Drogheda and District Chamber has been in operation and listing new organisations with which they work in collaboration. It is stated that Drogheda and District Chamber fully support the request made in the submissions by other parties especially in relation to:

Strong action on the development of the PANCR;

- Inclusion of access to the River Boyne in the development of Drogheda as Fáilte Ireland's Destination town;
- Inclusion of a tourism attraction of note within the town centre;
- Development of regional offices of Fáilte Ireland, Enterprise Ireland and the IDA within Drogheda to focus and assist in supporting the town's growth;
- Zoning of appropriate employment generating lands and allocating the infrastructure investment required to support such lands;
- Supporting the development of the Westgate vision for the town's regeneration; and
- Planning for and implementing the capital investment in the water supply.

Acknowledged that national and regional policies influenced the drawing up of the draft Plan but concern expressed that there are some inaccuracies.

The following issues require attention:

- Appendix 2 – The infrastructure assessment and land use evaluation of Drogheda appears grossly insufficient, only 3 sites are assessed and all are residential, there are no assessment of tier 1 or tier 2 sites for industry / commerce, all other settlements are given much greater assessment. The infrastructure assessment should be re-done to ensure that there are adequate sites for FDI and indigenous industries.
- Appendix 3 – The housing strategy should be re-done for Drogheda, with appropriate modelling incorporating all residential development external to the town boundary to ensure the plan proposal meets the needs of the town and environs over the plan period.
- Appendix 4 – Retail Strategy, again the Louth figures are assessed ignoring the Meath part of Drogheda or the local services high population areas, the manner of assessment of retail space requirement appears to be county wide rather than strategic to each centre. The Retail Strategy should be re-done for Drogheda, with appropriate modelling incorporating all trans-boundary populations to ensure the plan proposal meets the needs of the town and environs over the plan period.

Written Statement

- The introduction should also reference the mandated trans-boundary urban development plan for Drogheda.
- In Growth strategy, Drogheda has a target population of 50, 000 persons by 2031, this should be altered to acknowledge the population which will be served by the joint LAP, the town of Drogheda (Louth and Meath), currently has a population of 50,000 persons. Policies pertaining to same in the plan should be amended accordingly. The shortfall in growth for the town of Drogheda will have serious implications.
- The section on compact growth and the inclusion of 30% through regeneration should be altered to acknowledge that Drogheda is already compact with density significantly higher than the norm.
- Within the tourism section, the reference to the Boyne greenway omits the current proposal to extend this facility to the Mornington beaches, the development of this extension, in conjunction with Meath County Council should be included as a policy.
- Within the tourism section the river Boyne has been omitted. A section addressing the plan for the river including the provision of access (pontoon, slipway), riverside parks, guidelines for riverside developments etc. should be included in the next draft and policy objectives to provide the required access and to protect this natural resource.
- Drogheda's ability to enhance the experience of these tourists and accrue a benefit in return is significantly limited due to the lack of an appropriately serviced coach parking facility in the town, this needs to be included as a policy.
- The section on infrastructure will require updating when the appropriate infrastructure analysis is re-done, in addition the funds (€75m) allocated to Meath County Council in 2008 and subsequently re-allocated to Irish Water, specifically for the water network upgrading in Drogheda and East Meath, should be tracked down and a policy objective put in place that the envisaged capital works to support the development of this region should be carried out within the life of the proposed plan.

Chief Executive's Response:

The support for issues raised in other submissions is noted. Further detail on the responses to these issues can be found in submission no. 747 (Love Drogheda Business Improvement District).

Appendix 2

The Infrastructure Assessment and Land Use Evaluation has been updated to include an examination of additional sites. An additional 11 sites were identified in Drogheda. This includes lands zoned for employment, tourism, regeneration, residential, and transportation uses.

Appendix 3

The Housing Strategy is a County based Housing Strategy. It has been prepared in accordance with the requirements of Part V of the Planning and Development Act 2000 (as amended). The core element of the Housing Strategy is a quantitative analysis based on population projections and people on different levels of income.

It also focuses on the provision of specialist housing, the need for a suitable mix of housing and the need to counteract undue segregation.

The Joint Local Area Plan for Drogheda will examine in greater detail the housing demand for Drogheda, including the lands in the Southern Environs. This will focus on any infrastructural constraints that are impeding the release of residential lands for development in addition to the key residential growth areas of the town. The detailed modeling suggested to be carried out is not required for the County Development Plan.

Appendix 4

The Retail Strategy is a county wide analysis of retail floorspace and spend within County Louth. It has been prepared in accordance with the provisions set out in the 'Retail Planning Guidelines for Planning Authorities' published by Department of the Environment, Heritage and Local Government (DoEHLG) in 2012.

It is clearly acknowledged within the Strategy that areas of Drogheda within the administrative boundary of County Meath are not included within the population and retail floorspace calculations. However, the quantitative analysis contained within Section 1.5 of the Strategy takes account of this by adjusting the available retail expenditure by way of inflows and outflows. For example, a significant outflow percentage is allocated to the comparison and bulky comparison spend to take account of the volume of bulky goods floor space at Donore Road Retail Park, Co. Meath.

It should be also noted that the retail landscape within Drogheda will be examined as part of the forthcoming Joint Local Area Plan between Louth and Meath County Councils.

Written Statement

Section 1.2 of the Introduction 'Regional Growth Centres' refers to the preparation of the Joint Plan for Drogheda.

The population of the entire town of Drogheda in 2016 was almost 41,000 (as based on the CSO boundary in Census 2016). It would not be considered accurate to indicate the population of the town is close to 50,000 at the time of writing.

Whilst it is acknowledged that Drogheda is a relatively compact settlement at present it is not considered necessary to refer to this on the section on compact growth. This point can be highlighted in the Joint LAP.

With regard to the timeframe for the preparation of the Joint Plan policy objective CS 9 indicates it will be a priority for the Council. Taking into account the fact that it is a Joint Plan with Meath County Council it is not considered appropriate to set out a timeframe in the Development Plan.

The Written Statement for Drogheda in section 2.13 of the Draft Plan refers to the lands located within Louth and provides the relevant details associated with same as this is the County Development Plan for Louth. The transboundary issues will be examined as part of the Joint LAP and a growth strategy for the town will be developed accordingly.

The Boyne Greenway is referenced in 6.3.1.2 and in section 7.5.11. In section 7.5.11 the narrative includes text that supports the progression of the Drogheda to Mornington section of the Boyne Greenway. This is supported by policy objective MOV 28.

Chapter 6 includes broad policy objectives supporting and promoting the provision of tourism related infrastructure. Whilst the Plan would support investment in infrastructure and facilities that would improve access to the River Boyne it is considered that this is a localised issue that can be addressed in the Joint LAP.

The issue raised regarding the provision of coach parking for tourists is a valid issue and is something that can be examined in greater detail as part of the Local Transport Plan for Drogheda to be prepared as part of the Joint LAP.

The Council will continue to work closely with Irish Water in addressing any deficiencies in the water supply and distribution network and waste water treatment and network. The potential solutions and recommendations to any deficiencies in the water supply will be set out in the National Water Resources Plan which is currently being prepared by Irish Water.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR770
Submitted By	Conor Keelan
Theme (s):	Chapter 2

Summary of Submission:

- Policy SS32 in the text does not reflect the amendment passed by the members. This should read: "To develop a network of green areas throughout the town, building on existing green infrastructure, and advancing the delivery of the Great Eastern Greenway along the coast incorporating the delivery of greenway and pedestrian infrastructure on both sides of the Castletown River" Related objective in MOV 30.
- The current Draft proposes to re-zone a small parcel of land, currently designated recreation and amenity, within the bounds of the Riverside Crescent estate to Residential.
In the 3 year Capital Programme there is a plan to build additional units within this estate. These lands are bounded by the Castletown River, the Riverside Walk and Outdoor gym and contain a wide mix of flora and fauna.
- I would impress the need for proposed design to be cognisant of these factors while also recognising historic legacy issues within the estate from the time of its construction which still require addressing.

Chief Executive's Response:

The additional wording of SS 32 in the Draft Plan does not reflect the amendment passed by the Elected Members. It is recommended that Policy Objective be amended to include for the additional wording as detailed.

Development of the newly zoned lands for residential use will be subject to compliance with the policy objectives and development management standards of the Draft Plan as they relate to the subject site. Issues including *inter alia*; community facilities, outdoor recreation, natural heritage, green infrastructure and biodiversity will be assessed during consideration of any development proposal on the subject lands.

Chief Executive's Recommendation :

Recommend additional wording to Policy Objective SS 32 as follows:

To develop a network of green areas throughout the town, building on existing green infrastructure, and advancing the delivery of the Great Eastern Greenway along the coast incorporating the delivery of greenway and pedestrian infrastructure on both sides of the Castletown River.

Submission No.:	LCDP DR778
Submitted By	Erin McGreehan
Theme (s):	Chapters 2, 3
Summary of Submission:	

- The plan should be stalled. Council has a responsibility to respect its residents to put this vast document to them during a level 5 lockdown is wrong. Residents of Louth should have had an opportunity to read this, discuss this in a group setting. Online consultation meetings are not acceptable.
- Welcome many aspects of the plan, including regeneration areas in Dundalk and the heritage quarter in Drogheda. Hope that they come to fruition
- Chapter on housing has many positive aspirations including making towns more attractive however it is aspirational and can't be guaranteed.
- One off Housing:
- No societal or economic impact has been undertaken.
- Rural communities are not a tourist attraction. They belong to the people who live here.
- The consequence of this plan is to displace a young population and depopulate an area, rural schools will be forced to close.
- The cost of housing in North Louth is going to increase, one off housing provides a cheaper, higher quality build than other options.
- There is no requirement in any national or regional plan to put in as heavy restrictions in Louth as proposed by the Draft Plan. RPO 4.80 of the RSES states that there must be an economic or social need to live in a rural area. This draft plan does not provide for either

- There is no provision to permit a build if you are a carer for a family member and require housing, this will put pressure on state care home.
- Rural policy Zone 2 allows for social need, residents of rural policy zone 1 deserve the same consideration.
- Specialist housing seems only to be provided for in an urban setting. Concerned that people with disabilities will not have a right to choose to live in a rural setting. Query how Council are going to provide housing for this displaced section of the population.
- The age friendly Strategy “that seeks to strengthen the wellbeing of older people within their communities”, plan can’t achieve this in North Louth as it will depopulate the rural elderly from their homes to an urban setting. Query if Council be providing for this type of housing?
- Request that exceptional health circumstances are recognised and supported.
- NPF is out of date due to pandemic. Remote working has been the biggest change and plan must make into consideration new working practices otherwise the people of Co. Louth will be denied the possibility of the new innovative solutions to work and live in their own community...
- Section 3.17.7 of the draft plan is in relation to the capacity of an area to absorb further development, it lacks clarity and is too subjective. Furthermore it is not clear what is meant by infrastructure.

Chief Executive Response

There is a statutory requirement under the Planning and Development Act for a development plan to be prepared every 6 years. The process of the review of the County Development Plan commenced in September 2019. There is a statutory timeframe within which a development plan must be prepared. This is set out under sections 11 and 12 of the Planning and Development Act 2000 (as amended).

Whilst it is recognised that the publication of the Draft Plan took place during an unprecedented public health pandemic the statutory timeframes during the Level 5 lockdown were not affected. The Department of Housing, Local Government, and Heritage published a circular in October 2019 setting out the ‘Effect of National Level 5 Covid-19 Restrictions on the Planning System’. Within this circular it was indicated on page 6 in relation to Development Plans "all statutory periods and timelines are still applicable."

In this regard the Forward Planning Team endeavoured to carry out consultations via online platforms in addition to responding to queries by email and phone.

A narrated summary of the key aspects of the Draft Plan was also provided. A total of 833 submissions were received on the Draft Development Plan. This is significantly greater than the number of submissions received on previous Plans.

It is acknowledged that the submission welcomes aspects of the plan such as the regeneration areas in Dundalk and the heritage quarter in Drogheda.

With regard to the rural issues raised in the submission please refer to Rural Policy General – Composite Response.

Section 5.9 of the Draft Plan specifically deals with Co-working Facilities and Home Based Activities. The Plan acknowledged that there are occupations where employees do not have to be in their main place of employment all the time, as they have the ability to work remotely. The Draft Plan supports the development of co-working facilities which provide flexibility in the working arrangements that will meet the needs of both start-up enterprises and established businesses, where employees have a local base that reduces the requirement to commute long distances on a daily basis.

Section 3.17.7 of the Draft Plan relates to the capacity of areas to absorb further development. As per the content of this section, it is stated that further detail is included within Section 13.12 of the Development Management Guidelines in Chapter 13. This is the incorrect reference and should be changed to reference Section 13.9.38 and Section 13.9.41. As per 13.9.41, the ability of the landscape to absorb further development of one-off housing and evidence of over proliferation of housing includes the number of existing dwellings in the area, the extent of intermittent views of dwellings, and the capacity of the local road network to accommodate further development.

Chief Executive's Recommendation :

Amend the text within Section 3.17.7 to read;
Further details on the criteria, and considerations for the siting and design of one off rural dwellings, is set out in ~~section 13.12~~ **Section 13.9.38 and Section 13.9.41** of the Development Management Guidelines in Chapter 13.

Submission No.:	LCDP DR779
Submitted By	David Hanratty
Theme (s):	Various Chapters

Summary of Submission:

The 'Climate Adaptation Strategy 2019-2024' is referenced in various documents but not always correctly, examples are included in the table below:

Examples include:

Chpt & Page	comment
1-23	Title reference Should be "Climate Change Adaptation Strategy 2019-2024"
2-24	Section 2.9 title reference Should be "Climate Change Adaptation Strategy 2019-2014"
6-4	TOU3 - title reference Should be "Climate Change Adaptation Strategy 2019-2024"
10-20	IU50 - reference should be Climate Change Adaptation Strategy 2019-2024
12-12	CS5 reference should be Climate Change Adaptation Strategy 2019-2024
12-25	CS5 reference should be Climate Change Adaptation Strategy 2019-2024
12-27	IU50 - reference should be Climate Change Adaptation Strategy 2019-2024

Chief Executive's Response:

The correct title 'Climate Change Adaptation Strategy 2019-2024' shall replace all currently incorrect references throughout the Draft Plan.

Chief Executive's Recommendation :

Recommend 'Climate Change Adaptation Strategy 2019-2024' shall replace all currently incorrect references throughout the Draft Plan.

Submission No.:	LCDP DR781
Submitted By	Fintan Malone
Theme (s):	Chapters 5, 6, 7

Summary of Submission:

Advantages of Ardee listed.

Ardee was considered a commuter town however there was very little help to bring industry into Ardee even though we have large landbanks in Currabeg zoned for industry.

A number of bypasses have been proposed over the years, however before any bypass goes ahead there needs to be regeneration plan for the town.

Previously plans were in place and money ring fenced for Ardee Castle refurbishment, there is no sign of the castle being opened to visitors. Ardee Castle and the Jumping Church were tourist attraction in the 60s and 70's.

The last development plan encouraged integration between new and mature housing developments, in many cases the bicycle lanes & walkways resulted in unsocial behaviour and were subsequently closed.

There are good bus links from Ardee to Dublin, Dundalk and Drogheda, however there is no bus links to some mid Louth Villages, Dunleer or the hinterland of North Meath and Navan.

Ardee is an ancient historic town that could be linked by a tourist triangle, walkway and bicycle lane between the Viking Village of Annagassan to Ardee's ancient battle of Cuchulainn & Ferdia on the river Dee to Tallanstown and the Cuchulainn Stone in Knockbridge and could eventually lead to the Táin Walk in Cooley.

Chief Executive's Response:

The designation of Ardee as a Self-Sustaining Growth Town in the Draft Plan is in recognition of its importance as a local service centre in the Mid-Louth area. The town has a strong employment base with excellent connectivity via the national road and motorway network.

The Draft Plan supports balanced population and economic growth in Ardee that will cater for the needs of the town and its wider catchment.

Under the Rural Regeneration Development Fund, Louth County Council was awarded Category 1 funding for the redevelopment of Ardee Castle which is an important asset to the town in addition to Category 2 funding to support the development of Project Ardee 2040.

With regards to roads infrastructure, the Council is working closely with TII in progressing the upgrade of the N2, and the N52 Ardee Bypass, both of which have been included in the National Development Plan.

In relation to public transport provision the National Transport Authority is preparing a Rural Mobility Plan 'Connecting Ireland', which will seek to increase connectivity and improve mobility in rural areas. The Council will engage and work closely with the NTA in the preparation of this Plan.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR793
Submitted By	The Burris Residents Group
Theme (s):	Chapter 7

Summary of Submission:

Details provided regarding the history of the Burris, Tullyallen.

The village of Tullyallen has seen great improvements in the last two decades, including footpaths and street-lighting. But the old main street of The Burris been greatly neglected. The Burris is not a 'tertiary road' rather a village street.

Contradiction that restricting the growth Tullyallen protects its heritage whilst at the same time the historic medieval street, The Burris is being neglected.

Chief Executive's Response:

The maintenance of public roads falls beyond the remit of the Draft Plan.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR800
Submitted By	Brendan McSherry
Theme (s):	General

Summary of Submission:

- A lot of repetition
- Quite varied in tone though.
- Some parts are very environmentally conscious, while others are extremely growth-orientated.
- We cannot conserve biodiversity and maintain a stable climate while constantly encouraging growth.
- We need to aim for, at most, a steady-state population and economy or, ideally, gradual contractions of both, back to sustainable levels.
- We need to leave lots of areas of land alone, to not use them for economic activity and to give them back to nature. Only when we have enough nature will we achieve sustainability.

Chief Executive's Response:

The observations of this submission are noted and welcomed. Due to cross cutting themes throughout the Draft Plan there may appear to be repetition, having regard to the scale and breadth of the document and the need to cross reference between chapters.

During the preparation of the Draft Plan, the Council has been compliant with the targeted pattern of growth as identified in the NPF, its Implementation Roadmap and the Settlement Strategy of the RSES

The Settlement Hierarchy for the County has been informed and guided by the RSES Growth Strategy in conjunction with the environmental sensitivities of the County.

In terms of growth, environment, biodiversity and other issues raised in the submission, the overarching Strategic Objectives of the Draft Plan broadly seek to:

- To promote and support the role of the RGC's
- Direct development in accordance with core and settlement strategies in accordance with the principles of compact and consolidated growth
- Transition to a low carbon and climate resilient county
- Ensure a sustainable and integrated concept of development regarding land use planning, transportation and services
- Conserve Green Infrastructure and ecosystem services supporting the sustainable management of natural assets and biodiversity
- Protect the built and natural heritage assets of the County
- Support sustainable development of rural areas
- Ensure the fulfilment of environmental responsibilities

Further the Draft Plan has been subject to a Strategic Environmental Assessment, an Appropriate Assessment and a Strategic Flood Risk Assessment.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR801
Submitted By	Housing Disability Steering Action Group
Theme (s):	General
Summary of Submission:	

- Document is inclusive in language and principles to all parts of society although could be seen as being nonspecific to the diverse needs of people with disabilities.
- Section 3.9 Housing could be re labelled as 'specialist housing/accommodation for people with disabilities
- Need for lower level access accommodation, and wet rooms to be included as part of the universal design guidelines for all accommodation in any planning applications granted.
- It is noted and welcomed in the document the part V accommodation will encompass bungalow accommodation where there are over 100 dwellings.
- Bungalow accommodation should be provided as a component of all Part V agreements not just those over 100 dwellings, this is important with the focus on compact growth.
- Accessibility and disability is not covered in each of the town, villages, and small village areas sections, inclusion of same should be considered.

Chief Executive's Response:

The comments in the submission indicating the language in the Draft Plan is inclusive is welcomed. With regard to the title of section 3.9 it was considered more appropriate for the title to be broad.

With regard to the provision of wet rooms this is part of the principles of universal design which is promoted in the Draft Plan.

In relation to Part V agreements, the type of unit to be delivered under Part V is dependent on the requirements in the area in which the development would be located. A suitable mix of housing within developments is promoted in the Draft Plan.

The Town and Village Statements in Volume 2 should be read in conjunction with the Chapters in Volume 1, with the Policy Objectives in Volume 1 being applicable in the assessment of any application in towns and villages. It is therefore not considered necessary to refer to accessibility in the Town and Village Statements.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR802
Submitted By	Fergus O'Dowd
Theme (s):	General

Summary of Submission:

- Louth County Council should be focusing primarily on the consolidation of existing residential communities and providing adequate infrastructure to meet the expected and planned development. It must be supported by adequate public transport links and investment policies and be as near as possible to schools, shops, employment, green zones and parks and other recreational facilities must be at the core of these policies.
- The building of social housing significant distances from town centres should be particularly avoided. Housing for older people and persons with disabilities should also be considered as near as possible to town centres, shopping, churches, health centres etc.
- There should also be provision for independent living with appropriate and professional care facilities and supports e.g. carers, nursing supports.
- Construction of apartments where essential should have adequate recreational space and safe secure visible playing areas with adequate children's play areas.
- Concern expressed regarding Rural Policy Zone 1, it is too restrictive. People want to live in the areas in which they have been reared, priority should be given to permanent workers over holiday homes. It should be core area of the plan to protect existing rural communities, concern expressed regarding impact on communities and schools.
- The town of Drogheda needs high level administrative supports from LCC. A city manager would oversee the growth of Drogheda to 50,000 persons. The manager would oversee the LAP and ensure appropriate development in South Louth and East Meath.
- Council should focus on delivery of recreational amenities for everyone. Support expressed for greenways. LCC requested to support Drogheda to Mornington Greenway, it would enormous benefits for Drogheda.

- Support expressed for the Lourdes Athletic club in Drogheda. Hoped that the council will work closely with the FAI, Drogheda United and the Department of Sport to support a new state of the art sports stadium in the town when the next round of funding is available.
- A review must be undertaken to look at suitable locations for playgrounds on grounds within the council's current footprint.
- The Council should also ensure that a Green belt is a priority surrounding existing urban areas such as the town of Drogheda. Significant parkland zoning is essential around the existing urban footprint of Drogheda.
- Support expressed for arrival of the DART to Drogheda. Council should advance plans with Irish Rail to look at the viability of opening a Drogheda North station and the reopening of the Dunleer Train Station.
- There is a major issue in the Drogheda area in terms of an available IDA Business Park that will attract the largescale investment we need to provide greater employment opportunities at a local level. Amazon Web Services will open up major opportunities. Council should be taking a lead role in working with the IDA and Enterprise Ireland to identify available sites locally for an advanced technology park.
- Support for PANCR
- A detailed assessment report should be funded to examine and report on the economic viability and benefits of a new road bridge to be built on the East side of Drogheda.
- The Vivian Geiran Drogheda Scoping report is due to be published imminently however council should be prioritising the development of the Moneymore Community Centre Plan. The CARL research Project clearly highlights the detrimental impact for young people growing up in a community where they are exposed to high criminality and gangland violence related to the ongoing drug-feud.
- Supporting the Ardee Bypass project will be vital for the people of mid Louth, traffic congestion in particular has become unbearable in the town itself, having a major impact on the traders of the town. The council should be pre planning for when this bypass is completed and must look at how the town of Ardee can sustainably grow and offer more in attracting tourists with amazing attractions such as the historic Ardee Castle which we hope to see open to the public in coming years.

Chief Executive's Response

One of the underlying principles is the creation of sustainable communities where people can have access to local services, employment, and amenities and there is a reduced dependence on the private car as the primary mode of travel. This will be achieved by promoting compact growth, the consolidation of existing settlements, and the development of brownfield and under-utilised lands.

In regard to the rural issues raised in the submission please refer to Rural Policy General – Composite Response.

The Draft Plan supports the provision of community facilities and will continue to work alongside any community groups and sporting organisations in progressing any projects.

A greenbelt is not a parkland zoning. The Council will continue to support the provision of parks and open spaces in appropriate locations in the County.

The Draft Plan recognises the benefits of and supports the progression of the DART Expansion to Drogheda. The NTA submission indicated that there is no funding available for additional rail stations outside the DART + Programme. This is addressed in further detail in the response to the NTA submission (submission no. 089).

The Council recognises the opportunities for Drogheda to strengthen its employment base and will continue to engage and work closely with the IDA in highlighting the strategic advantages of Drogheda for economic investment.

As part of the Local Transport Plan further analysis of future infrastructure requirements/priority infrastructure will be examined.

The Draft Plan supports the progression of community infrastructure projects including those that will assist in addressing social exclusion, anti-social behaviour. Any projects specific to Drogheda will be addressed in further detail as part of the Joint LAP.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR810
Submitted By	The Mill Enterprise Hub
Theme (s):	General
Summary of Submission:	

- Detailed analysis of how Drogheda grown and developed, has been provided along with a synopsis of how it is working towards 'a vibrant buzzy enterprising city'. Drogheda can become one of Ireland's driving forces in regional economic development.
- Support for the LAP is expressed but it is stated that this should be expressed as a Strategic Objective of the Plan
- Drogheda has the reputation of a start-up hub, the Mill Enterprise Hub hosts c. 35 companies and 80 employees. A list of companies which have chosen Drogheda as their preferred location is provided. Bodies representing Drogheda are working in collaboration and have developed effective working relations with relevant government departments and organisations to reverse 'brain drain'. The draft Louth CDP 2021-2027 does not identify suitable lands necessary to encourage FDI Investment.
- Collaboration between Louth and Meath needs to be fast tracked.
- A unified brand and vision for Drogheda needs to be devised. Drogheda Chamber and The Mill Enterprise Hub are working on same.
- Details of a commuter survey from June 2020 are provided.

Main observations:

- Drogheda does not include enough 'Business & technology' zoning in the current draft CDP to attract jobs that will entice the 15,000 skilled commuters within 15 minutes of Drogheda M1 park. Circa 20 acres of 'business & technology' zoned land in Drogheda compares with the 1000 acres of 'business & technology' zoned land in Dundalk. The amount of land zoned for employment use does not meet the needs of existing and projected populations.
- The land that The Mill is on (and adjacent area), could be converted to 'Business & Technology' zoned area as part of a revamp of the 2009 Newtown Enterprise Masterplan.
- The Cross-Boundary Local Area Plan (LAP) is critical if Drogheda is to develop in a cohesive and planned manner. We realise that the LAP can't be commenced until the CDP is complete but believe that relevant research and detailed timeframe of plan can be created.
- The new Drogheda Digital Innovation Hub could be a starting point for town centre 'business & technology' employment, as part of WestGate vision. WestGate vision needs to be updated as it does not include an enterprise/employment section which is now considered essential in 'Town centre first' policies.
- Draft CDP doesn't ensure that there is land for 'high-value' jobs, in particular there is no plan for IDA activity and it is not identified as a specific policy (as per Ardee & Dundalk). Many years of underinvestment in Drogheda by IDA companies needs to be addressed to counteract commuting.
- Draft CDP doesn't promote Cluster development in Drogheda- In particular, there is an opportunity for Drogheda to develop as a Fintech Hub due to The Fintech Corridor (M1 Payments). This new proposed Business and Technology park should incorporate a 'Fintech Corridor Hub/ Building' HQ to house fintech & payments-related companies that have been, and will be enticed to the M1 region via the IDA and www.thefintechcorridor.com.
- Enterprise Ireland's submission to Louth plan included the need to create a Northeast Business Innovation Centre (BIC). The plan for DDIH in Youthreach building also highlighted the opportunity to create a Northeast BIC in Drogheda (with The Mill) that would help to attract scalable start-ups, Clusters, and market Drogheda as an innovative town. We currently don't have a government support agency based in Drogheda – this could help us foster innovation and provide jobs. We request that it is inserted in CDP as an aim of Louth Council.
- Drogheda Map does not include any 'Research & Innovation' zoning. The EMRA strategy includes locating a campus of DKIT in Drogheda and it was also included in the previous Louth CDP. There is an opportunity to promote a National Fintech Park in Drogheda that includes a 'Centre of Excellence' as part of The Fintech Corridor. There is also an opportunity to encourage the building of LMETB HQ. The existing planning permission is possibly too small, and a new site or building may need to be proposed. The LMETB HQ could be incorporated in an educational campus alongside a DKIT Centre of Excellence or other specialised centre.

- There is no land identified for a potential IDA Park for FDI ('business & technology zoning') There is no plan to develop a large 'business & technology' zone, apart from small plot in Greenhills and the IDA park in Meath that only has 8.5 acres remaining. This is contrary to EMRA plan and Ireland 2040 plan to match employment and population growth as a RGC focal point. A Business and Technology Park is required in the 'Louth' section of Drogheda.
- The October 2020 report from Regional Assemblies' notes the need to create 'Co-working Hubs of Scale'. There is an opportunity to work with IDA and EI to create a specially built co-working park or large hub to target FDI and indigenous companies that currently employ 'commuters'.
- The Greater Drogheda Area currently has some of the highest (and longest) commuter rates in Ireland. This is unsustainable and contradicts the 2040 plan to lower emissions and develop the regions. Drogheda is the ideal location to encourage those based in North Dublin to lower their commuting time via a 'reverse commute'. Louth County Council should target commuters and encourage companies to develop second site solutions in Drogheda.
- Chapter 6 Tourism - Tourism brings direct expenditure into towns, creates employment and is a direct driver of economic activity. Feasibility study completed with Enterprise Ireland in 2020 that looks at how Louth / Meath could develop a cluster based on the Traveltech and Aviation sectors. Drogheda has neither a dedicated Tourism Officer nor Heritage Officer. Museum at Millmount which currently receives no funding from LCC – unlike its counterpart, the County Museum in Dundalk which is fully funded by LCC. There is a massive opportunity to create additional employment due to Drogheda's designation as a 'Destination Town' but it needs dedicated resources.
- It stated the Draft Louth CDP 2021 -2027 should align with Project Ireland 2040 and the Eastern & Midland Regional Assembly Regional Assembly's recommendations included in their spatial plan. The main points of both reports are included within the submission.

Chief Executive's Response:

Outbound Commuting

The proximity of Drogheda to Dublin City Centre and Metropolitan Area makes the town an attractive location for commuters working in Dublin to live, particularly due to the road and rail connectivity with Dublin and the cost of housing being more affordable.

This Plan seeks to reduce the dependence on outbound commuting for employment by supporting and facilitating economic investment and employment related development in the town by building on the strengths of the town including its strategic location along the Dublin-Belfast Economic Corridor and access to an educated and skilled workforce.

'Business and Technology Lands'

It is noted that the majority of lands zoned for employment uses in Drogheda are zoned 'General Employment'. The reason for retaining a 'General Employment' zoning across the majority of employment lands was to provide the flexibility for potential investors to choose their preferred location in the town to invest.

The guidance notes for the 'General Employment' Zoning in section 13.19.16 indicates that any uses deemed permissible under the 'Business and Technology' zoning can be considered on lands zoned 'General Employment'. This provides a greater degree of flexibility. Taking account of the mixture of businesses currently operating in the Mill Enterprise Hub it is considered appropriate to retain the 'General Employment' zoning. As part of the preparation of the Joint Local Area Plan a more detailed examination of undeveloped employment lands can be carried out and a specific location for 'Business and Technology' lands can be identified if required.

Timeframe for the preparation of the Joint LAP

Policy objective CS9 indicates that the preparation of the Joint Plan will be a priority for the Council. Taking into account the fact that it is a Joint Plan with Meath County Council it is not considered appropriate to set out a timeframe in the Development Plan.

Update of the Westgate Vision

The Westgate Vision supports the regeneration of the Westgate Area of the Town. It identifies that the lands can be utilised for a range of uses including residential, office, institutional, and retail. The land use zoning of the Westgate Area in the Draft Plan is D1 'Regeneration'. This is a flexible land use zoning that will enable an appropriately considered use to be considered on these lands.

High Value Jobs

The Council will continue to work closely with the IDA in relation to identifying potential opportunities for multi-national and foreign direct investment in Drogheda and Enterprise Ireland in supporting and facilitating the growth and development of indigenous industry. Policy objective EE 5 promotes a close working relationship between the Council, IDA, and other agencies in promoting and facilitating foreign direct investment in Louth. An additional policy objective supporting FDI in Drogheda could be inserted into the Economic Profile for Drogheda set out in section 5.12 of Chapter 5.

IDA Park

The Council will continue to engage and work closely with the IDA in identifying any lands required for any requirement to provide any additional IDA lands in Drogheda.

Co-Working Hubs and facilities

Section 5.9 of chapter 5 provides a strong narrative on the provision of co-working facilities in the County. This is supported by policy objective EE 22.

Tourism Officer and funding of Millmount museum

The Draft Plan recognises the potential opportunities to grow and develop the tourist industry in the County including the destination town of Drogheda. The issues raised relating to the provision of a tourism officer and the funding of the Millmount museum are outside the scope of the Development Plan process.

The Draft Plan is strongly aligned with national and regional policy.

Chief Executive's Recommendation :

Insert the following additional policy objective into Section 5.12 of chapter 5:

EEXX To promote Drogheda as a location for Foreign Direct Investment.

Submission No.:	LCDP DR821
Submitted By	Brian Hanratty
Theme (s):	General
Summary of Submission:	

- Drogheda's recent milestones are outlined. Status as a RGC is overdue.
- LCC have done very little to leverage Drogheda's RGC status, plan ignores the social, financial and environmental needs of c.80,000 people living in the Greater Drogheda Area.
- Draft Plan has been developed through the lens of Dundalk, disproportionate focus on north Louth and north of the border. A MOU can be established with Newry and Mourne Council but not with Meath.
- No mention of 'East Link' bridge connecting the future PANCR with developments in East Meath. Creation of an orbital route would benefit the town as a whole.
- The Draft Louth CDP 2021-2027, must include a Strategic Objective urging co-operation between Louth and Meath, neither counties have a senior management representative in Drogheda. Drogheda is not a priority for either council.
- Drogheda should enjoy the same level of commercial activity as Dundalk, IDA should be engaged.
- Millmount museum should be supported by LCC and consideration should be given to the provision of a military museum at Oldbridge.
- Our Lady of Lourdes hospital needs to be endorsed by the Plan.
- 6 challenges facing Drogheda are outlined:
 - a. Housing: Expedite PANCR and carry out feasibility study in relation to 'Eastlink' Bridge.
 - b. Local Jobs: Secure IDA investment and replace IDA Business Park. Locate IDA Regional Office in Drogheda. Drogheda is strategically located at the 'Gateway to the Boyne Valley', tourism investment is required.
 - c. Commuting: Figures provided. Reverse commuting by creating local employment and affordable transport. Develop car-sharing/pooling initiatives to alleviate traffic congestion.
 - d. Community: Target areas of social deprivation and provide suitable supports.
 - e. Administration: Deputy CEO should be locally based with a management team. Restore local democracy and reinstate Drogheda Borough Council.
 - f. Infrastructure: Our Lady of Lourdes Hospital should be formalised as the North East Regional Hospital. DKIT and DCU should merge to create a North Eastern University.

Chief Executive's Response:**Regional Growth Centre status**

The Draft Plan places a strong emphasis on the designation of Drogheda as a Regional Growth Centre. The town has been prioritised for population, residential and economic related investment. There is also strong support for the progression and delivery of critical enabling infrastructure projects that will facilitate the growth of the town and enable it to fulfil its potential as a regional driver of economic growth.

Collaboration with Meath County Council

The Council works with Meath County Council on the provision of a range of services in the area including library and fire services.

'East Link Bridge'

This project can be examined in greater detail as part of the preparation of the Local Transport Plan for Drogheda.

IDA Engagement

The Council will continue work closely with the IDA in relation to identifying potential opportunities for multi-national and foreign direct investment in Drogheda and Enterprise Ireland in supporting and facilitating the growth and development of indigenous industry. Policy objective EE 5 promotes a close working relationship between the Council, IDA, and other agencies in promoting and facilitating foreign direct investment in Louth.

Our Lady of Lourdes Hospital

Section 4.12 of chapter 4 provides a strong narrative on healthcare facilities in the County, including Our Lady of Lourdes Hospital. This is supported by policy objective SC 37.

Challenges

The challenges for Drogheda highlighted in the submission are noted. These will be addressed and examined in greater detail as part of the preparation of the Joint Local Area Plan.

Chief Executive's Recommendation :

No Change

Submission No.:	LCDP DR824
Submitted By	Coleman Carroll
Theme (s):	Chapter 7
Summary of Submission:	
Request that traffic priority at Chord Road/ Constitution Hill and Jim Garry Way/ Palace Street be reversed urgently. Request that steps to protect pedestrian safety be taken at exit of car park at Laurence Centre on Palace Street. Request that sightlines at junction of Drogheda Road/Callystown junction be improved and passing bays provided on road to Port Oriel.	
Chief Executive's Response:	
Specific issues raised in the submission relating to traffic management/movement etc. are operational issues which would not fall within the remit of the County Development Plan which is a strategic document. Specific local issues can be considered during the preparation of the Joint LAP (LCC and MCC).	
Chief Executive's Recommendation :	
No change	

Submission No.:	LCDP DR826
Submitted By	Drogheda District Elected Members. Cllr Kevin Callan, Mayor of Drogheda Cllr James Byrne Cllr Joanna Byrne Cllr Tom Cunningham Cllr Michelle Hall Cllr Fiachra MacRaghnaill Cllr Paddy McQuillan Cllr Declan Power Cllr Pio Smith Cllr Eileen Tully
Theme (s):	General
Summary of Submission:	
Details provided regarding Drogheda's history and development. The benefits of Drogheda are highlighted however Drogheda experiences a high level of commuting. The negative consequences of which are listed. In terms of economic development Drogheda's assets are outlined.	
Following Policy Objectives are suggested:	
1. To promote Drogheda as a location for Foreign Direct Investment. 2. To develop a Framework Plan for Drogheda on part of the lands titled employment generation. The Framework Plan should aim to develop a specific area into a location of international standing that will attract and encourage inward investment into Drogheda. The above mentioned development of a Framework Plan is to include the 350 hectares of land to the north side of the River Boyne and contained within the Borough District Area.	

3. Implicit in this Framework is the desire to reinforce the role of Drogheda as a key Regional Growth Centre. The plan should include but not be confined to the following:
 - Landmark entrance
 - Information and signage system
 - Development cells
 - Private and public artworks
 - Biodiversity park
 - Transport management system
 - Environmental landscaping
4. Identify a distinctive proposition to promote revitalization and redevelopment of the Heritage Quarter through implementation of the West Gate Vision and the Urban Design Framework Plan.
5. To promote the development of the Docklands area. We reference for the purposes of this submission, the Docklands Area Plan of 2007 which provides the required framework of the redevelopment of the area including the creation of a new urban quarter on both sides of the River Boyne. As port activities have ceased on the South Quay we say that regeneration would stimulate further redevelopment and a compact and vibrant living space in the town centre area.

Importance of the Port Access Northern Cross Route

Provision of PANCR has the potential to permit the development of 5000 residential properties and 350 hectares of employment generation lands to the northern area of Drogheda. It is of paramount importance to the future of Drogheda must be a key priority of Louth County Council for the lifetime of the Draft Plan. LCC are requested to seek funding for same were possible. The development of the Northern Environs shall be prioritised in order to support balanced growth for Drogheda.

Joint Local Area Plan

The LAP is an additional element required to assist in Drogheda reaching its economic potential. Every effort must be made to progress cooperation on the LAP with County Meath

Chief Executive's Response:

The identification of the opportunities for Drogheda to build on its strengths which include the strategic location of the town, access to an educated workforce and its attractive setting in the Boyne Valley are welcomed. The Draft Plan seeks to utilise these strengths to assist in facilitating and supporting the role of Drogheda as a regional driver for economic growth and investment.

Foreign Direct Investment

The Council will continue to work closely with the IDA in relation to identifying potential opportunities for multi-national and foreign direct investment in Drogheda and Enterprise Ireland in supporting and facilitating the growth and development of indigenous industry.

Policy objective EE 5 promotes a close working relationship between the Council, IDA, and other agencies in promoting and facilitating foreign direct investment in Louth. An additional policy objective supporting FDI in Drogheda could be inserted into the Economic Profile for Drogheda set out in section 5.12 of Chapter 5. This issue is also addressed in submission 810 from the Mill Enterprise Hub.

Framework Plan

Section 5.12.4 of the Draft Plan provides details on the undeveloped employment lands in Drogheda. This includes the large land banks in the northern part of the town. The Council will continue to work with the various agencies, stakeholders, and landowners in attracting potential investors and employers and facilitating the development of the lands. The Draft Plan indicates a Master Plan will be required to be prepared for these lands in order to ensure the co-ordination of any development. The details as set out in the proposed Framework Plan can be addressed as part of a Master Plan.

Westgate Vision, Heritage Quarter, and Docklands area

The support for and recognition of the benefits of the regeneration of the Westgate and Docklands area of Drogheda in addition to the implementation of the Urban Design Framework for the Heritage Quarter in creating a vibrant and attractive town centre area is welcomed.

PANCR

The PANCR is identified as a critical piece of enabling infrastructure for the future growth and development of Drogheda. The progression and delivery of this project is strongly supported and promoted in the Draft Plan.

Chief Executive's Recommendation :

Insert the following additional policy objective into section 5.12 of chapter 5:

EEXX To promote Drogheda as a location for Foreign Direct Investment.

Submission No.:	LCDP DR828
Submitted By	Marianne Butler
Theme (s):	

Summary of Submission:

Chapter 1

- Strategic Objective SO 4: Change 2050 to 2030

Chapter 2

- Amend Policy Objective CS5 to include Climate Action and Low Carbon Development (Amendment) Bill 2020
- Under 2.14.3, Regeneration Areas add former Dunnes on Park Street.

Chapter 3 Under 3.2.1

- Add objective in relation to Land Development Agency:
- To actively support the work of the Land Development Agency in order to make more effective use of State lands, providing a stable, sustainable supply of land for housing.
- Under 3.5 Use text of Section 3.5.3 as a policy objective
- Table 3.1: Add Dunnes Store Site, Park Street.
- Include more detail regarding housing for those seeking asylum/ refugees
- HOU 27 – Single storey housing should be a ‘minimum’ of 5%

Chapter 4

- Under Section 4.16 add Policy Objective in relation to natural burial grounds (this could be added to SC44 or a standalone objective).

Chapter 6

- Amend greenway policy or create new policy regarding connection of greenway areas to urban centres especially Dundalk/ Drogheda.

Chapter 7

- Amend Policy Objective MOV4: Remove “as part of the preparation” replace with “in advance of the preparation”.
- Add new policy objective that “Preparation of Local Transport Plan will commence as soon as possible
- MOV 7: increase % of support wiring ducting to 25%
- MOV 8: To encourage and expand the provision of car sharing infrastructure and facilities at appropriately located areas throughout the County.
- MOV 20: Include ‘Major employers’
- Section 7.5.11, connect greenways to urban centres and provide facilities/ ducting for e bikes at appropriate locations along greenways.
- MOV 33: Remove “subject to the availability of funding”.
- Possibly add line to objective “work to secure funding with relevant stakeholders”.
- Add new objective: to identify suitable locations and secure funding to implement new initiatives such as “School Streets”.
- Section 7.8.4 concern regarding. “The delivery of these link roads will be developer driven and are likely to be constructed in sections”.
- Include a policy objective that requires link roads to be provided and completed in advance of developments and at a minimum that the council seeks to secure cash bonds until they are completed and taking in charge to the necessary standard

Chapter 8

- Enhance protection on any trees that are deemed a. Champion trees and b. Trees Woodlands of Special Amenity Value to Tree Preservation Orders
- Policy Objective NBG31:-The replacement ratio is increased from 10:1 in all areas outside of Dundalk and Drogheda to 12:1:-The replacement ratio in increased from 4:1 in Dundalk and Drogheda to 5:1.

Also stipulate that replacement trees must be semi mature and native species. Also require that as part of planning conditions that new “trees” that do not take are replaced and that trees are maintained/pruned annually/semi-annually. Consideration needs to be given in this policy objective for native fruit trees and planting

- Table 8.15 Soldier misspelled at VP36 & VP41
- Under 8.13.2 Add new policy objective:
- That supports re-establishing connectivity between natural areas in order to restore the health of ecosystems and allow species to thrive in their natural habitats
- NBG 57 concern regarding wording. Add new policy objective:
- That Council supports the work of the National Biodiversity Data Centre by becoming a partner council to All Ireland Pollinator Plan

Chapter 10

- Policy Objective IU 41 should be strengthened.
- Add new Policy objective under 10.5.2.2:
- That Louth County Council signs up to the Covenant of Mayors for Climate and Energy Europe in order to be at the forefront of tackling climate action by learning from and partnering with fellow EU local authorities.
- Under 10.7 Solar Energy Text should become new policy objective:
- The Council will support and facilitate the development of solar energy, encourage passive solar design, solar PV and solar water heating in new buildings and in retrofitting buildings.

Chapter 11

- Amend Policy Objective ENV4 Policy Objective ENV 4:
- To support the goals and objectives of the EU Green Deal, the Climate Action Plan 2019, the Climate Action and Low Carbon Development (Amendment) Bill 2020 and the Climate Action Charter in ensuring sustainable development across the County.
- Section 11.1.5 Air Quality Insert new objective: To support the work of the EPA in monitoring Air Quality throughout the county and to identify new locations that require real time air quality monitoring stations to be installed.

Chapter 12

- Amend Policy Objective CS5 to include: Climate Action and Low Carbon Development (Amendment) Bill 2020

Chapter 13

- Under 13.9.12 Landscaping As previously stated increase tree replacement ratio as outlined above.
- Under 13.9.15 Public Open Space Text needs to be amended in order to encourage that part of public open space requirement is used to support biodiversity
- Under 13.9.18:- Again increase ducting and wiring required to support electric vehicle charging from 20% to 25%.
- Under 13.11.7 and 13.11.13 Landscaping and Boundary Treatments Again increase replacement ratio of native trees per above.

- 13.12.3:-preference should be for provision of multi-storey and/or basement parking over surface parking.
- 13.14.4 Reference to Park and Share and Kiss and Ride facilities
- 13.14.9 Again increase ducting and wiring required to support electric vehicle charging from 20% to 25%.
- Table 13.10:- Is there a supporting map?
- 13.14.12 concerned by the low provision of spaces in Table 13.11, Provision needs to be made for car parking for visitors/deliveries in residential developments. In larger commercial, industrial, retail and residential (apartments) multi storey and and/or basement parking should be encouraged to support compact growth and optimal land use.

Chief Executive's Response:

Chapter 1

SO4 supports the transition to a low carbon economy by 2050. This year has been selected based on consistency with EU policy and the national Climate Action Plan 2019 which has a net zero target by 2050.

Chapter 2 - No Change

In relation to the former Dunnes Stores Site it is considered more appropriate to retain this as a 'Retail Opportunity Site'. Within the Draft Plan it is important that a number of sites are identified for specific retail uses. Both the regeneration and retail opportunity sites are supported for redevelopment.

Chapter 3

Section 3.2.1 of Chapter 3 includes a reference to the Land Development Agency.

In relation to the Vacant Sites in section 3.5.3 it is not considered an additional policy objective is required this is covered under HOU 8.

With regard to asylum seekers and refugees it is considered that the general policy objectives in the chapter, which promote sustainable communities and a suitable mix of housing, would include accommodation for asylum seekers and refugees.

With regard to single storey properties, it must also be noted that apartments will also be an option for 'downsizing' and meeting the needs of older people. In addition when striving to achieve compact growth there needs to be a balance in the number of single storey properties in a development due to the footprint they take up. In this regard the figure of 1% is considered reasonable.

Chapter 4

Natural burial grounds support and promote biodiversity and it is considered that the inclusion of such within Policy Objective SC 44 is appropriate.

Chapter 6

Chapter 6 includes general policies with regard to Greenways, with a particular emphasis on tourist infrastructure. It is noted that Chapter 7 – Movement contains specific policies with regards to Greenways in Drogheda and Dundalk such as MOV28 (Boyne Greenway) and MOV30 (Coastal Greenway from Dundalk to Blackrock including the delivery of such infrastructure on both sides of the Castletown River, and Baltray to Drogheda through the Louth Coastal Defence Projects).

Chapter 7

The Local Transport Plans will be prepared alongside the preparation of the Local Area Plans. It is not considered necessary to amend the wording of policy objective MOV 4.

Providing charging points for electric vehicles for 20% of parking spaces in a development is considered reasonable. This will be assessed on a case by case basis and can be increased when considered necessary. It is not considered necessary to increase to 25%.

The narrative relating to car sharing in section 7.5.3 indicates the Draft Plan recognises its benefits. It is not considered necessary to amend this policy objective.

There would be no objections to amending MOV 20 to include ‘major employment areas’.

With regard to the section on greenways additional text could be inserted into section 7.5.11 supporting improvements in connections between greenways and town centres and existing walking and cycling infrastructure.

MOV 33 it is considered the text relating to funding is retained.

With regard to the request for an additional policy objective supporting other schools related transport initiatives MOV 33 could be amended to reference same.

With regard to the Dundalk Link Roads the construction and delivery of the roads will be addressed as part of a Master Plan and planning application. No further detail is required in the Development Plan.

Chapter 8

The Draft Plan recognises that trees and in particular groups of trees are an important component of the local landscape and townscape and in this regard, their protection is promoted. Regarding Trees and Woodlands of Special Amenity Value, Policy Objective NBG 29 and NBG 30 seek to review and where appropriate make additional trees preservation orders in relation to trees of special amenity value.

Regarding the number of replacement trees in relation to those removed in Dundalk and Drogheda and the remainder of the County, there is no objection to the increase from 4 to 5 in urban areas. However, it is considered that the replacement of 10:1 in areas outside of Dundalk and Drogheda is appropriate. Policy Objective IU 31 already requires that replacement trees and hedgerows are of a native species. The proposal that they are also of a semi mature nature is considered overtly onerous from a financial perspective.

Planning conditions and issues relating to the maintenance and pruning lie outside of the remit of the Development plan. Notwithstanding this, conditions relating to landscaping attached to permissions specifically require that planting shall be permanently retained and any plant that fails shall be replaced.

Spelling corrections as advised will be made.

Green Infrastructure is an interconnected network of green spaces that help conserve natural ecosystems in both urban and rural locations and its importance is recognised in the Plan both in narrative and policy objectives. Including support for the re-establishment of connectivity between natural areas is appropriate and should be referenced in Policy.

Support for NBG 57 is noted and welcomed. This 10m swath of land is to provide a riparian corridor adjacent to a waterway and in recognition that these corridors provide a crucial link between terrestrial and stream ecosystems and typically home to a diverse range of plant species. The width of this corridor can vary along its length dependent on the location and the adjacent use. It is recognised that in urban areas where there is existing development this may not be possible.

The Draft Plan seeks to promote and implement the objectives of the Louth Biodiversity Plan (NBG 2). The Pollinator Plan will be considered in the context of the Council's new Climate Action Plan.

Chapter 10

Circular PL 07/12 regarding Telecommunication Antennae and Support Structure Guidelines, states that the lodgement of a bond or cash deposit is not appropriate and that a condition just be included stating that when the structure is no longer required it should be demolished, removed and the site reinstated.

In relation to solar energy, it is considered that the existing policy objectives are sufficiently robust including support for solar energy infrastructure in the County including commercial scale development (IU 57), solar energy for on-site energy use (IU 58), support for heat pumps (IU 59), energy efficiency measures in new and in retrofitting of existing buildings (IU 73) and sustainable design and energy efficiency in buildings (IU 74).

Chapter 11

It is considered that additional text which supports the EPA monitoring system is appropriate.

Chapter 13

With regard to landscaping the ratio of tree planting included is considered reasonable.

Taking account of the various range of landscaping and different locations in which planting will take place it is not considered necessary to stipulate that all trees are to be semi-mature. This can be addressed at the planning application stage.

Additional text could be inserted indicating that any planting shall consist of native species (trees, hedgerow, shrubs, and wildflowers) and that such planting will provide food for pollinators.

Open space can be used for both active and passive uses. Section 13.9.15 sets out the various ways in which it can be used. Additional text could be inserted that in appropriate locations parts of open spaces could be used to support biodiversity.

The suggestion that basement or multi-storey car parking should be preferred over surface parking in the Regional Growth Centres is a valid suggestion however consideration must also be given to the costs associated with providing this type of car parking. Taking this into account car parking will be considered on a case by case basis.

Section 13.14.4 deals specifically with Park and Ride Facilities. The title can be expanded to refer to 'Park and Share' and additional text included.

The issue regarding charging points has been addressed under 'Chapter 7' above.

It is not considered a supporting map is required alongside Table 10. Any queries can be dealt with at pre-planning stage.

The Car Parking Standards are considered reasonable and have been provided in accordance with national guidance.

Chief Executive's Recommendation :

Chapter 4

Include additional wording to SC 44 as follows:

'To support the development of new or extended burial grounds, **including natural burial grounds** and crematoria at suitable locations in the County, subject to appropriate safeguards with regard to environmental, noise and traffic impacts and residential amenities'.

Chapter 7

Amend policy objective MOV 20 as follows:

To improve pedestrian and cycle connectivity to schools, third level colleges, **major employment areas**, bus and rail stations, and other public transport hubs.

Insert the following additional text into section 7.5.11:

The Council **will support improvements in the links between greenways, town centres and existing walking and cycling infrastructure and** is committed to continuing to develop and invest in the network of Greenways in the County as follows:

Amend MOV 33 as follows:

To support the Green School Programme **and any other sustainable transport initiative developed by schools** across the County through the provision of dedicated walking and cycling infrastructure in close proximity to schools, subject to the availability of funding.

Chapter 8

Amend Policy Objective NBG 31 to read as follows:

Where in exceptional circumstances, trees and or hedgerows are required to be removed in order to facilitate development, this shall be done outside nesting season and there shall be a requirement that each tree felled is replaced at a ratio of 10:1 with native species and each hedgerow removed is to be replaced with a native species. In Drogheda and Dundalk, replacement trees will be required at a ratio of 5:1 where the removal of trees is required in order to facilitate development.

Mis-spelling of Soldier shall be corrected in Table 8.15

Insert additional wording in NBG 42 to read as follows:

‘To require the use of and develop the green infrastructure network, and support re-establishing connectivity to ensure the conservation and enhancement of biodiversity and as a supplementary guide for the protection and conservation of the European Sites in County Louth’.

Chapter 11

Insert the following text at the end of Section 11.1.5 Air Quality;

The work of the EPA in monitoring Air Quality is noted and the Plan is supportive of new air quality real time monitoring stations within the County.

Chapter 13

Insert the following additional text into section 13.9.12 ‘Landscaping’ and 13.11.7 ‘Landscaping and Boundary Treatments’

Any planting shall consist of native species (trees, hedgerow, shrubs, and wildflowers), and low maintenance pollinator friendly perennials.

Insert the following additional text into section 13.9.15:

If designed and located appropriately, they 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. They can also be used to support and improve biodiversity in neighbourhoods.

Insert the following additional text into section 13.4.4:

13.4.4 Park and Ride/ Park and Share Facilities

In addition to providing parking facilities, the design and layout of Park and Ride facilities shall include provision for a set down area for buses, a sheltered waiting area for customers, appropriate pedestrian and cycle connectivity within the facility and from the surrounding neighbourhoods, and bicycle parking. The facility Park and Ride and Park and Share facilities shall also be suitably lit to provide a degree of security and public safety.

Submission No:	LCDP DR514
Submitted By	John McBride
Theme (s):	Chapter 9

Summary of Submission:

Omission of Irish Language from Plan is alarming. The LECP identifies the importance of Oriel Heritage in Louth. Include policies to support Irish Language. The strategic vision for the County doesn't mention the Irish Language. Request that the following is included:

- County Louth Irish Language Plan. In line with the National 20 year Strategy for the Irish Language 2010-2030.
- Identified need for a plan to provide Irish medium education in the county with planning for Naíonraí, Gaelscoileanna and Gaelcholáistí in Louth within the lifetime of this plan.

Louth currently has one of the lowest rates of provision of Irish medium education at both primary and secondary level in the country and is the lowest in Leinster. The Louth County Development plan should prioritise the planning for additional Naíonraí and Gaelscoileanna in areas of population increase. Gaeilscoileanna and Naíonraí in Drogheda and Dundalk are oversubscribed and children are travelling to Balbriggan from Drogheda and Dundalk to obtain post primary Irish medium education. Irish medium education from Naíonraí level should be provided in the north of the county to support Louth County Council's aim to promote and protect the language and heritage from the Oriel region.

- A gaelcholáiste should be provided in Dundalk, based on the approval in principle by the Department of Education for a satellite of Coláiste Ghlór na Mara in Dundalk, dependent on a suitable premises being identified, which will act as the nucleus for the gaelcholáiste. The gaelcholáiste will serve all of north, mid and south Louth as far south as Termonfeckin / north Drogheda environs, as the Balbriggan gaelcholáiste already serves south Drogheda.
- Equality of language on signage in accordance with the Official Languages Act 2003. Make equality of language on signage a policy in the Louth County Development Plan, ensuring that the Irish spelling and grammar on signage is checked and correct for all signs produced by Louth Co. Council by the Oifigeach Gaeilge.
- Encouragement/promotion of business and shop signage in Irish or bilingual format. As funding is now being provided for the preservation of Irish language business and shop fronts, the Development Plan should make it a priority to encourage and promote the use of Irish on business and shop fronts in the county.
- Naming of New Developments in Louth. All planning applications granted for housing developments and new streets should include a planning condition that proposals for the naming of the development and associated roads and streets are either in the Irish language and/or in bilingual format and reflecting local heritage of Co. Louth in accordance with the Department Circular 'Naming of Streets and Roads, Numbering of Houses and the Use of Irish.'

Chief Executive's Response:

The Strategic Vision for the County is an overarching vision which is broad in narrative and principle and would not be an appropriate for specific reference to one particular element of cultural heritage. Reference to LECP is noted as is its role in developing community dimensions. The County Development Plan provides spatial strategy for the realisation of the objectives and actions of the LECP in a sustainable and planned manner. SC 1 seeks engagement with the LCDC, development agencies, community groups and various stakeholders in supporting implementation of the LECP. The inclusion in the Draft Plan of reference to Linguistic cultural heritage is appropriate and a new section and policy objective shall be included in Chapter 9.

- **County Louth Irish Language Plan**

The Council has an Irish Language Scheme as required under Section 13 of the Official Language Act, the primary objective of which is to ensure better availability and a higher standard of public services through the medium of Irish. Whilst the principles of the 20 year Strategy for the Irish Language 2010-2020 are acknowledged, the Council has no proposals currently to include an Irish Language Plan.

- **Identified need for a plan to provide Irish medium education in the county with planning for Naíonraí, Gaelscoileanna and Gaelcholáistí in Louth within the lifetime of this plan.**

The Department of Education and Skills is responsible for the delivery of educational facilities and services in the County. The role of the Council is to work closely with the Department under the 2012 nationally agreed Memorandum of Understanding in relation to the proactive identification and acquisition of school sites and in support of the Department's schools building programme into the future. It is also the role of the Department based on analysis and modelling to establish the need for Naíonraí, Gaelscoileanna and Gaelcholáistí in the County. The Council in its policy objectives seeks to ensure adequate lands are zoned to cater for educational facilities, and reserve sites in those areas identified for significant population growth or likely demographic demand (SC 25 and SC 26).

- **Equality of language on signage in accordance with the Official Languages Act 2003.**
The Minister issued Regulations regarding public signage requiring that such signage be bilingual. There is therefore no need to include a policy objective in this regard as it is a legal requirement. All grammar and spelling is verified by the Council's Irish Language Officer.

- **Encouragement/promotion of business and shop signage in Irish or bilingual format**
The Council encourages the preservation of authentic, traditional shopfronts and good quality contemporary designs, requiring that signage development complies with the assessment criteria as set out within the Development Management Guidelines of Chapter 13. The Draft Plan is silent in terms of the provision of bilingual or Irish format. The Council will support the inclusion of additional narrative in Section 13.12.9 in this regard.

- Naming of New Developments in Louth.
Louth's Placenames Committee was established to ensure, as far as possible, that place names reflect the rich Irish cultural heritage of the County and are relevant to the area as they have the ability to communicate the relationship between people and their landscape and environment. The Council acknowledges and promotes modern place names to reflect the local topography, history, culture and heritage of the areas while also having regard to the Irish language. Upon granting planning permission for a multi unit residential development and major infrastructure development, a condition of planning requires the developer to agree a naming with the Placenames Committee.

Chief Executive's Recommendation:

1. Volume 1, Chapter 9, Page 25 , New Section
2. Volume 1, Chapter 13, Page 35, Section 13.12.9 (additional text in red)

New Section 9.10

Linguistic Cultural Heritage

The 2003 UN Convention for the Safeguarding of the Intangible Cultural Heritage recognises the vital role of language in the expression and transmission of living heritage. It notes that all intangible cultural heritage depends on language for its day-to-day vitality, and to ensure it is passed from one generation to the next. Louth has a rich language and literary tradition. The Oriel Irish dialect continued to be spoken in Omeath until just after the middle of the 20th century. In recognition of this, and the increasing numbers of Irish language speakers setting up home in the area, the Omeath branch of Conradh na Gaeilge was set-up in July 2014 to promote the Irish language in Omeath and its surrounding area. The Council recognises the importance of and will support initiatives in promoting the Irish language in the County.

New Policy Objective:

To support initiatives promoting the Irish language within the County.

Recommend additional narrative to Section 13.12.9 as follows: **Use of the Irish Language in business and shopfront signage is welcomed by the Council'.**

Submission No:	LCDP DR517
Submitted By	Aidan Kinsella
Theme (s):	Chapter 9
Summary of Submission:	

- Identified need for a plan to provide Irish medium education in the county with planning for Naíonraí, Gaelscoileanna and Gaelcholáistí in Louth within the lifetime of this plan. Louth currently has one of the lowest rates of provision of Irish medium education at both primary and secondary level in the country and is the lowest in Leinster. The Louth County Development plan should prioritise the planning for additional Naíonraí and Gaelscoileanna in areas of population increase. Gaelscoileanna and Naíonraí in Drogheda and Dundalk are oversubscribed and children are travelling to Balbriggan from Drogheda and Dundalk to obtain post primary Irish medium education.

Irish medium education from Naíonraí level should be provided in the north of the county to support Louth County Council's aim to promote and protect the language and heritage from the Oriel region. A Gaelcholáiste should be provide in Dundalk, based on the approval in principle by the Department of Education for a satellite of Coláiste Ghlor na Mara in Dundalk, dependent on a suitable premises being identified, which will act as the nucleus for the gaelcholáiste. The gaelcholáiste will serve all of north, mid and south Louth as far south as Termonfeckin / north Drogheda environs, as the Balbriggan gaelcholáiste already serves south Drogheda.

- Naming of new developments in Louth.
All planning applications granted for housing developments and new streets should include a planning condition that proposals for the naming of the development and associated roads and streets are either in the Irish language and/or in bilingual format and reflecting local heritage of Co. Louth in accordance with the Department Circular 'Naming of Streets and Roads, Numbering of Houses and the Use of Irish'
- Equality of language on signage in accordance with the Official Languages Act 2003.
Make equality of language on signage a policy in the Louth County Development Plan, ensuring that the Irish spelling and grammar on signage is checked and correct for all signs produced by Louth Co. Council by the Oifigeach Gaeilge.
- Encouragement/promotion of business and shop signage in Irish or bilingual format
As funding is now being provided for the preservation of Irish language business and shop fronts, the Development Plan should make it a priority to encourage and promote the use of Irish on business and shop fronts in the county.
- County Louth Irish Language Plan.
In line with the National 20 year Strategy for the Irish Language 2010-2030

Chief Executive's Response:

- County Louth Irish Language Plan.
The Council has an Irish Language Scheme as required under Section 13 of the Official Language Act, the primary objective of which is to ensure better availability and a higher standard of public services through the medium of Irish. Whilst the principles of the 20 year Strategy for the Irish Language 2010-2020 are acknowledged, the Council has no proposals currently to include an Irish Language Plan.
- Identified need for a plan to provide Irish medium education in the county with planning for Naíonraí, Gaelscoileanna and Gaelcholáistí in Louth within the lifetime of this plan.

The Department of Education and Skills is responsible for the delivery of educational facilities and services in the County.

The role of the Council is to work closely with the Department under the 2012 nationally agreed Memorandum of Understanding in relation to the proactive identification and acquisition of school sites and in support of the Department's schools building programme into the future.

It is also the role of the Department based on analysis and modelling to establish the need for Naíonraí, Gaelscoileanna and Gaelcholáistí in the County. The Council in its policy objectives seeks to ensure adequate lands are zoned to cater for educational facilities, and reserve sites in those areas identified for significant population growth or likely demographic demand (SC 25 and SC 26).

- Equality of language on signage in accordance with the Official Languages Act 2003. The Minister issued Regulations regarding public signage requiring that such signage be bilingual. There is therefore no need to include a policy objective in this regard as it is a legal requirement. All grammar and spelling is verified by the Council's Irish Language Officer.
- Encouragement/promotion of business and shop signage in Irish or bilingual format.
The Council encourages the preservation of authentic, traditional shopfronts and good quality contemporary designs, requiring that signage development complies with the assessment criteria as set out within the Development Management Guidelines of Chapter 13. The Draft Plan is silent in terms of the provision of bilingual or Irish format. The Council will support the inclusion of additional narrative in Section 13.12.9.
- Naming of new developments in Louth
Louth's Placenames Committee was established to ensure, as far as possible, that place names reflect the rich Irish cultural heritage of the County and are relevant to the area as they have the ability to communicate the relationship between people and their landscape and environment.

The Council acknowledges and promotes modern place names to reflect the local topography, history, culture and heritage of the areas while also having regard to the Irish language. Upon granting planning permission for a multi unit residential development and major infrastructure development, a condition of planning requires the developer to agree a naming with the Placenames Committee.

Chief Executive's Recommendation:

Recommend additional narrative to Section 13.12.9 as follows: **Use of the Irish Language in business and shopfront signage is welcomed by the Council'.**

Submission No:	LCDP DR519
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Submitted By	Eugene Toner
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Theme (s):	Chapter 9
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Summary of Submission:

Omission of Irish Language from draft Plan is alarming, Plan should consider importance of language and submission requests that the following is included:

- Develop a Co Louth Irish Language Plan,
- Need to Plan for an Irish Medium education in the County – Naíonraí, Gaelscoileanna and Gaelcholaisti in Louth.
- Encouragement/ promotion of business and shop signage in Irish or bilingual format.
- Naming of new development in Irish/ bilingual format.

Chief Executive's Response:

See Response to Submission LCDP DR514

Chief Executive's Recommendation:

See response to Submission LCDP DR514

Submission No:	LCDP DR602
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Submitted By	Vincent Fagan
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Theme (s):	Chapter 9
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Summary of Submission:

Submission requests that the following is included:

- Need to Plan for an Irish Medium education in the County – Naíonraí, Gaelscoileanna and Gaelcholaisti in Louth.
- Naming of new development in Irish/ bilingual format.
- Equality of language on signage in accordance with the Official Languages Act 2003.
- Encouragement/ promotion of business and shop signage in Irish or bilingual format.

Chief Executive's Response:

See Response to Submission LCDP DR514

Chief Executive's Recommendation:

See response to Submission LCDP DR514

Submission No:	LCDP DR616
Submitted By	Aidan Kinsella on behalf of Gaelcholáiste do Contae Lú
Theme (s):	Chapter 9

Summary of Submission:

Plan should include policies that are supportive of the language. Request that the following is included:

- County Louth Irish Language Plan.
In line with the National 20 year Strategy for the Irish Language 2010-2030.
- Provision of an Irish medium education in the county with planning for Naíonraí, Gaelscoileanna and Gaelcholáistí in Louth within the lifetime of this plan.

Louth currently has one of the lowest rates of provision of Irish medium education at both primary and secondary level in the country and is the lowest in Leinster. The provision of two additional 500 pupil gaelscoileanna would bring the percentage of Irish medium primary school places available in Louth to near the national average of 8%. The provision of two new 400 pupil gaelcholáistí in Dundalk and Drogheda would bring the percentage of Irish medium post-primary school places available in Louth to just over the national average of 4%. It should be noted that this figure is targeted to double nationally to 8% by 2030 and so even with the provision of these gaelcholáistí, Louth would still be below the national average.

We are currently involved with An Foras Pátrúnachta to establish a satellite of a Co. Dublin gaelcholáiste (Coláiste Ghlór na Mara, Balbriggan) in Dundalk. We are planning to open this school in September 2021 and this will become the nucleus of a new gaelcholáiste that we are planning to eventually open in Dundalk. The Louth County Development plan should prioritise the planning for additional Naíonraí and Gaelscoileanna in areas of population increase, namely Dundalk and Drogheda. In addition to this, planning should be started for the provision of Irish medium education from Naíonraí level in the north of the county to support Louth County Council's aim to promote and protect the language and heritage from the Oriel region.

Chief Executive's Response:

See Response to Submission LCDP DR514

Chief Executive's Recommendation:

See response to Submission LCDP DR514

Submission No:	LCDP DR0624
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Submitted By	Sinn Féin Louth
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Theme (s):	Chapter 9
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Summary of Submission:

The strategic vision of the Draft County development plan doesn't mention the Irish language. The LECP identifies the importance of Oriel Heritage in Louth. Include policies to support Irish Language. Sinn Féin Louth requests that the following be included in the Louth County Development Plan 2021-2027.

- Equality of language on signage in accordance with the Official Languages Act 2003. Louth County Council to consider making equality of language on signage an action in the Louth County Development Plan ensuring that the Irish spelling and grammar on signage is checked and correct for all signs produced by Louth County Council by the Oifigeach Gaeilge.
- Naming of new developments in Louth.
All planning applications for housing developments and new streets should require proposals for the naming of the development with an Irish language option and/or in bilingual format and reflecting local heritage of Louth in accordance with the Department Circular 'Naming of Streets and Roads, Numbering of Houses and the Use of Irish'.
- Encouragement/promotion of business and shop signage in Irish or bilingual. With funding now being provided for the preservation of Irish language business and shop fronts, Louth County Council make it a priority to encourage and promote the use of Irish on business and shop fronts in the county.
- Identified need for a Gaeloideachas in the county and planning for Naoíscoileanna, Gaelscoileanna and Gaelcholáistí in Louth within the lifetime of this plan.
Plan and identify need for Gaelcholáiste in the county to be included in the Louth County Development Plan. This need is not only evidenced by the oversubscribed Gaeilscoileanna and Naoíscoileanna in Drogheda and Dundalk, but by the number of children travelling to Balbriggan to receive their education through the medium of Irish from Drogheda and Dundalk and the approval in principle by the Department of Education for a satellite of Coláiste Ghlor na Mara in Louth dependent on a suitable premises being identified. In addition to this, planning should be started for the provision of Irish medium education from Naoíscoil level in the north of the county to support Louth County Council's aim to promote and protect the language and heritage from the Oriel region.

Chief Executive's Response:

See response to Submission LCDP DR514

Chief Executive's Recommendation:

See response to Submission LCDP DR514

Submission No:	LCDP DR643
Submitted By	Niall O Sluain Secretary Conradh na Gaeilge , Dún Dealgan
Theme (s):	Chapter 9

Summary of Submission:

- All street, road and directional signs in the county be in bilingual format with equal prominence given to Gaeilge and English. Care be taken to ensure the Gaeilge format is accurate and grammatically correct.
- When naming all new developments that local geographical, historical and cultural contexts are taken into account.
- The Council would highlight the rich Gaelic heritage of Oriel by placing before the public an appropriate permanent exhibition in the county museum, examples provided.
- With regard to promoting Gaeilge in the community that the council would help to organise a Comórtas i bhFuinneoga na Siopaí in all towns during Seachtain na Gaeilge in the month of March.
- To encourage spoken Irish among students the council could sponsor a number of part-scholarships to the Donegal Gaeltacht
- A committee could be formed with the view of drawing up an Action Plan for the promotion of Irish Language in the County.

Chief Executive's Response:

Issues relating to road and directional signage, in addition to the naming of new developments, is addressed in the Response to Submission LCDP 0514. All others raised in the submission including exhibitions, Comórtas i bhFuinneoga na Siopaí, sponsoring scholarships and the committee formation for drawing up an Action Plan for promotion of the Irish language all lie outside the remit of the Development Plan.

Chief Executive's Recommendation:

No Change

Submission No:	LCDP DR734
Submitted By	Maria Ward
Theme (s):	Chapter 9

Summary of Submission:

Background

Omission of Irish Language from Plan is alarming. The Louth Economic and Community Plan identifies the importance of Oriel Heritage in Louth, the strategic vision for the County doesn't mention the Irish Language and policies should be included in the Plan.

Request that the following is included:

- County Louth Irish Language Plan.
In line with the National 20 year Strategy for the Irish Language 2010-2030.

- Identified need for a plan to provide Irish medium education in the county with planning for Naíonraí, Gaelscoileanna and Gaelcholáistí in Louth within the lifetime of this plan.

Louth currently has one of the lowest rates of provision of Irish medium education at both primary and secondary level in the country and is the lowest in Leinster. The Louth County Development plan should prioritise the planning for additional Naíonraí and Gaelscoileanna in areas of population increase. Gaelscoileanna and Naíonraí in Drogheda and Dundalk are oversubscribed and children are travelling to Balbriggan from Drogheda and Dundalk to obtain post primary Irish medium education.

Irish medium education from Naíonraí level should be provided in the north of the county to support Louth County Council's aim to promote and protect the language and heritage from the Oriel region. A Gaelcholáiste should be provide in Dundalk, based on the approval in principle by the Department of Education for a satellite of Coláiste Ghlor na Mara in Dundalk, dependent on a suitable premises being identified, which will act as the nucleus for the gaelcholáiste. The gaelcholáiste will serve all of north, mid and south Louth as far south as Termonfeckin / north Drogheda environs, as the Balbriggan gaelcholáiste already serves south Drogheda.

- Equality of language on signage in accordance with the Official Languages Act 2003. Make equality of language on signage a policy in the Louth County Development Plan, ensuring that the Irish spelling and grammar on signage is checked and correct for all signs produced by Louth Co. Council by the Oifigeach Gaeilge.
- Encouragement/promotion of business and shop signage in Irish or bilingual format. As funding is now being provided for the preservation of Irish language business and shop fronts, the Development Plan should make it a priority to encourage and promote the use of Irish on business and shop fronts in the county.
- Naming of new developments in Louth.
All planning applications granted for housing developments and new streets should include a planning condition that proposals for the naming of the development and associated roads and streets are either in the Irish language and/or in bilingual format and reflecting local heritage of Co. Louth in accordance with the Department Circular 'Naming of Streets and Roads, Numbering of Houses and the Use of Irish'

Chief Executive's Response:

See Response to Submission LCDP DR514

Chief Executive's Recommendation:

See response to Submission LCDP DR514

Aighneacht Uimh.:	LCDP DR763
Curtha isteach ag:	Caoimhín Ó hEaghra Ard-Rúnaí, An Foras Pátrúnachta
Téama(i):	Caibidil 4

Achoimre ar an Aighneacht

- Tá an céatadán is ísle de scoileanna Gaeilge sa tír ag Contae Lú agus tá éileamh ar níos mó scoileanna Gaeilge ag leibhéal na bunscoile agus na hiar-bhunscoile araon.
- Faoi láthair, téann mic léinn as Dún Dealgan go Baile Bhrigín i gContae Bhaile Átha Cliath chun oideachas Gaeilge a fháil ag an leibhéal meánscoile.
- I bhfianaise an fhás a mheastar a thiocfaidh ar an daonra sa chontae sna blianta beaga amach romhainn, meastar go mbeidh gá le níos mó bunscoileanna Gaeilge agus le dhá cheann de Ghaelcholáistí sa chontae.
- Tacaímid leis an aighneacht ‘Gaelcholáiste do Chontae Lú’ atá i gceangal leis seo, agus leis na moltaí a dhéantar sa doiciméad sin.
- Teastóidh bunscoileanna agus meánscoileanna breise ó Dhún Dealgan agus ó Dhroichead Átha, fosta.
- Má mheastar go mbeidh 1000 spás breise ag teastáil i nDún Dealgan agus 1000 spás breise i nDroichead Átha, iarraimid go ndéanfaí socrú ionas go gcuirfear scoil Bhéarla 600 dalta agus scoil Ghaeilge 400 dalta ar fáil ar champas, in ionad scoil amháin do 1000 dalta.
- Ag obair faoi láthair le Coláiste Ghlór na Mara i mBaile Bhrigín i nDún Dealgan.

Freagra an Phríomhfheidhmeannaigh:

Féach an freagra ar Aighneacht LCDP DR514 (thíos)

Moladh an Phríomhfheidhmeannaigh:

Féach an freagra ar Aighneacht LCDP DR514 (thíos)

Submission No:	LCDP DR763
Submitted By	Caoimhín Ó hEaghra, Ard-Rúnaí, An Foras Pátrúnachta
Theme (s):	Chapter 4

Summary of Submission:

- County Louth has the lowest percentage of Irish-medium schools in the country there is a demand for more all-Irish schools at primary and second level.
- At present, students from Dundalk travel to Balbriggan in County Dublin to receive an all-Irish education at secondary level
- In light of the projected population growth for the county over the next few years, it is considered that more Irish-medium primary schools and two Gaelcholáistí will be needed in the county.
- We support the attached submission ‘Gaelcholáiste do Chontae Louth’ and the recommendations made in that document
- Dundalk and Drogheda will also require additional primary and secondary schools

- If it is estimated that an additional 1000 spaces will be required in Dundalk and an additional 1000 spaces in Drogheda, we request that an accommodation be made so that a 600-pupil English-medium school and a 400-pupil Irish-medium school, situated on a campus instead of one 1000-pupil school.
- Currently working with Coláiste Ghlór an Mara in Balbriggan in Dundalk.

Chief Executive's Response:

See response to Submission LCDP DR514

Chief Executive's Recommendation:

See response to Submission LCDP DR514

Aighneacht Uimh.:

LCDP DR776

Curtha isteach ag:

Catriona Ruane

Téama(i):

Caibidil 9

Achoimre ar an Aighneacht

Ba chóir na ceithre phointe seo a chur isteach i gCaibidil 9 (Oidhreacht agus Cultúr) de na tráchtanna scríofa, de bhrí gur aidhmeanna de BHC 39, 40, 41, agus 42 iad.

- Ba cheart tacaíocht a thabhairt d'eagraíochtaí atá ag obair chun an Ghaeilge a chur chun cinn i ngach gné den saol.
- Go ndéanfaidh an Chomhairle scrúdú ar na féidearthachtaí a bhainfeadh le líonra pleanála teanga a bhunú i leithinis Chuaille, i gcomhthéacs na reachtaíochta pleanála teanga.
- Ba cheart don Chomhairle a chinntiú go bhfuil an Ghaeilge le feiceáil go forleathan ar fud an chontae agus tacaíocht agus deontais a chur ar fáil do ghnólaigh agus d'eagraíochtaí pobail ar mian leo comharthaíocht Ghaeilge a bheith acu.
- Ba cheart don Chomhairle comórtas a eagrú le duaiseanna chun aitheantas a thabhairt do chuideachtaí a sheolann a ngnó trí Ghaeilge agus a bhfuil comharthaíocht Ghaeilge acu.
- Ba cheart don Chomhairle beartas a fhorbairt maidir le hainmniú forbairtí nua tithíochta, go mbeidís dátheangach, agus go gcinnteofaí go mbeadh ainmneacha forbairtí nua tithíochta bunaithe ar stair, oidhreacht, nádúr agus logainmneacha áitiúla, in ionad ainmneacha nach bhfuil aon bhaint acu leis an áit.
- Ba cheart don Chomhairle tacú le húsáid na Gaeilge, lena n-áirítear ciorcail chomhrá agus tacaíocht do dhaoine óga atá ag dul go dtí an Ghaeltacht.

Freagra an Phríomhfheidhmeannaigh:

Dírítear ar an gceist maidir le heastáit nua a ainmniú sa Fhreagra ar Aighneacht LCDP DR514 (féach thíos).

Tá gach saincheist eile a ardaíodh san aighneacht lena n-áirítear tacaíocht d'eagraíochtaí atá ag cur na Gaeilge chun cinn, líonra pleanála teanga, scéimeanna deontais, comórtais agus tacaíocht dóibh siúd a thugann cuairt ar an nGaeltacht uile lasmuigh de shainchúram an Phlean Forbartha.

Moladh an Phríomhfheidhmeannaigh:

Gan athrú

Submission No:	LCDP DR776
Submitted By:	Caitriona Ruane
Theme (s):	Chapter 9

Summary of Submission:

These four points should be inserted in Chapter 9 (Heritage and Culture) of the written comments, as they are aims of BHC 39, 40, 41, and 42.

- Support should be given to organisations which are working to develop Irish in all aspects of life.
- That the Council would examine the possibilities of a language planning network, in the context of language planning legislation, being established in the Cooley peninsula.
- Council should ensure that Irish is visible widely and prominently throughout the county and that there would be support and grants made available to businesses and community organisations who wish to have Irish language signage.
- Council should organise a competition with prizes to recognise companies who conduct their business through Irish and with signage in Irish.
- Council should develop policy on the naming of new housing developments, that they would be bilingual, and would ensure that the names of new housing developments be based on the history, heritage, nature and local place names, instead of names which have no connection to the locality.
- Council should support the use of Irish, including conversation circles and support for young people going to the Gaeltacht

Chief Executive's Response:

The issue regarding Naming of new estates is addressed in the Response to Submission LCDP DR514.

All other issues raised in the submission including support for organisations developing the Irish language, a language planning network, grant schemes, competitions and support for those visiting the Gaeltacht all lie outside the remit of the Development Plan.

Chief Executive's Recommendation:

No Change

Freagra an Phríomhfheidhmeannaigh (DR514):

Is fíis uileghabhálach í an Fhís Straitéiseach don Chontae atá leathan ó thaobh prionsabail agus cur i bhfeidhm agus ní bheadh sé oiriúnach tagairt shonrach a dhéanamh ann d'éilimint áirithe amháin den oidhreacht chultúrtha. Tugtar aird ar an tagairt don LECP mar aon lena ról ó thaobh lánpháirtíocht phoiblí a fhorbairt. Soláthraíonn an Plean Forbartha Contae straitéis spásúil chun cuspóirí agus gníomhartha an LECP a chur i ngníomh ar bhealach inbhuanaithe pleanáilte. Féachtar i SC 1 le teagmháil a dhéanamh leis an LCDP, gníomhaireachtaí forbartha, grúpaí pobail agus páirtithe leasmhara éagsúla chun tacú le cur i bhfeidhm an LECP. Is iomchuí tagairt a dhéanamh sa Dréachtphlean don oidhreacht chultúrtha teangeolaíoch agus áireofar mír agus cuspóir beartais nua i gCaibidil 9.

- Scéim Gaeilge Chontae Lú

Tá Scéim Gaeilge ag an gComhairle mar a éilítear faoi Alt 13 d'Acht na dTeangacha Oifigiúla, a bhfuil sé mar phríomhaidhm aici infhaighteacht níos fearr agus caighdeán níos airde seirbhísí poiblí Gaeilge a chinntiú. Cé go n-aithnítear prionsabail na Straitéise 20 bliain don Ghaeilge 2010-2020, níl aon phlean ag an gComhairle faoi láthair chun Plean Gaeilge a chur san áireamh ann.
- Riachtanas aitheanta do phlean chun oideachas Gaeilge a sholáthar sa chontae agus pleanáil a dhéanamh do naíonraí, gaelscoileanna agus gaelcholáistí i Lú laistigh de thréimhse an phlean seo.

An Roinn Oideachais atá freagrach as áiseanna agus seirbhísí oideachais a sholáthar sa Chontae. Is é ról na Comhairle oibriú go dlúth leis an Roinn faoi Mheabhrán Comhthuisceana 2012 a comhaontaíodh go náisiúnta maidir le suíomhanna do scoileanna a aithint agus a cheannach ar shlí réamhghníomhach agus tacú le clár tógála scoileanna na Roinne i gcónaí. Is é ról na Roinne freisin an gá atá le naíonraí, gaelscoileanna agus gaelcholáistí sa Chontae a dhéanamh amach, bunaithe ar anailís agus ar shamhaltú. Féachann an Chomhairle, ina cuspóirí beartais, lena chinntiú go ndéantar tailte leordhóthanacha a chriosú chun freastal ar shaoráidí oideachais, agus láithreáin a chur in áirithe sna ceantair sin atá aitheanta d'fhás suntasach daonra nó éileamh déimeagrafach dóchúil (SC 25 agus SC 26).
- Comhionannas teangacha ar chomharthaíocht de réir Acht na dTeangacha Oifigiúla 2003.

D'eisigh an tAire Rialacháin maidir le comharthaíocht phoiblí á cheangail go mbeadh an chomharthaíocht sin dátheangach. Mar sin ní gá cuspóir beartais a áireamh ina leith seo toisc gur riachtanas dlíthiúil é. Fíoraíonn Oifigeach Gaeilge na Comhairle an ghramadach agus an litriú go léir.
- Comharthaíocht Ghaeilge nó dhátheangach a chur chun cinn ar ghnólachtaí agus ar shiopaí.

Spreagann an Chomhairle siopaí chun aghaidheanna barántúla traidisiúnta agus dearaí comhaimseartha ar ardchaighdeán a úsáid, agus ceanglaítear go gcaithfidh comharthaíocht na critéir mheasúnaithe atá leagtha amach sna Treoirínte um Bainistíocht Forbartha i gCaibidil 13 a chomhlíonadh. Ní dhéantar tagairt sa Dréachtplean do leagan dátheangach nó leagan Gaeilge a sholáthar. Tacóidh an Chomhairle le téacs breise a chur isteach i Roinn 13.12.9 ina leith seo.
- Forbairtí Nua i Lú a ainmniú.

Bunaíodh Coiste Logainmneacha Lú le cinntiú, a mhéid is féidir, go léiríonn logainmneacha oidhreacht chultúrtha shaibhir Éireannach an Chontae agus go bhfuil baint acu leis an gceantar de bhrí gur féidir leo an gaol idir daoine agus an tírdhreach agus an timpeallacht ina maireann siad a chur in iúl. Déanann an Chomhairle logainmneacha nua-aimseartha a aithint agus a chur chun cinn mar léiriú ar thopagrafaíocht, stair, cultúr agus oidhreacht na gceantar a léiriú agus aird á tabhairt ar an nGaeilge freisin. Nuair a thugtar cead pleanála d'fhorbairt chónaithe il-aonad agus d'fhorbairt mhór bhonneagair, is coinníoll pleanála ar an bhforbróir é go n-aontófar an t-ainmniú le Coiste na Logainmneacha.

Moladh an Phríomhfheidhmeannaigh:

3. Imleabhar 1, Caibidil 9, Leathanach 25, Alt Nua
4. Imleabhar 1, Caibidil 13, Leathanach 35, Alt 13.12.9 (téacs breise i ndath dearg)

Roinn Nua 9.10

Oidhreacht Chultúrtha Teangeolaíoch

Aithníonn Coinbhinsiún na Náisiún Aontaithe 2003 um Chosaint na hOidhreachta Cultúrtha Doláimhsithe ról ríthábhachtach na teanga i léiriú agus i gcur ar aghaidh na hoidhreachta beo. Tugann sé dá aire go mbraitheann gach oidhreacht chultúrtha doláimhsithe ar theanga dá beogacht ó lá go lá, agus chun a chinntiú go ndéantar í a aistriú ó ghlúin go glúin. Tá traidisiún saibhir teanga agus litríochta ag Lú. Bhí canúint Ghaeilge Oirialla a labhairt in O Méith go dtí díreach tar éis lár an 20ú haois. Mar aitheantas air sin, agus ar líon na gcainteoirí Gaeilge a bhí ag cur fúthu sa cheantar a bheith ag dul i méid, bunaíodh brainse Ó Méith de Chonradh na Gaeilge i mí Iúil 2014 chun an Ghaeilge a chur chun cinn in Ó Méith agus sa cheantar máguaird. Aithníonn an Chomhairle an tábhacht a bhaineann le tionscnaimh chun an Ghaeilge a chur chun cinn sa Chontae agus tacóidh sí leo.

Cuspóir Nua Beartais:

Tacú le tionscnaimh a chuireann an Ghaeilge chun cinn sa Chontae.

Moltar téacs breise a chur isteach i Roinn 13.12.9 mar seo a leanas: **Fáiltíonn an Chomhairle roimh úsáid na Gaeilge i gcomharthaíocht ghnó agus ar aghaidheanna siopaí.**

Submissions No:	LCDP DR352, 468, 480, 502, 548, 605, 615, 703, 711, 772, 785
Submitted by:	Anna Nova, Eoin Hallinan, Martin Plichta, Gareth Byrne, Terry Farrell, Suzanne Connolly, Emma Coughlan, Robert Farrell, Teresa Farrell, Ken Connolly and Maria Farrell
Theme (s):	Drogheda Waste Water Treatment Plant
Summary of Submission:	

- Concerns over malodours emitted from Drogheda WWTP
- Ongoing issue for many years

Chief Executive's Response:

In accordance with the Water Services Act 2013, the responsibility for the provision of public water supply, wastewater collection and treatment services, transferred from the remit of the local authorities to Irish Water (IW). Since 2014, Irish Water has been responsible for the operation of public water services including *inter alia* the management and maintenance of water assets and infrastructure.

Ongoing issues regarding malodours emanating from Drogheda's Waste Water Treatment Plant are an operational matter relating to Irish Water. Currently, Irish Water is actively endeavouring to address these issues with EPS which is the company managing the plant under a long-term Operation and Management contract. As such, issues of malodour lie outside the remit of the Louth County Development Plan.

Chief Executive's Recommendation

No Change

Submission No:	LCDP DR232
Submitted By	Orlagh Fegan
Theme (s):	Chapter 11 Drogheda Waste Water Treatment Plant.
Summary of Submission:	

- Over the last 7 plus years this facility has been the source of long term malodours especially during the warmer months e.g. March to September.
- It is affecting 1000's of residents, preventing them from leaving windows open.
- Residents have expressed anger on a Facebook page.
- There are issues in relation to the testing and recording of water samples, shutting down of a number of tanks and the general state of disrepair which the plant has been allowed to fall into.
- 100's of complaints have been made to the EPA.

Chief Executive's Response:

Observations and concerns regarding long term issues with the Drogheda Waste Water Treatment Plant including malodours and alleged operational practices, in addition to ongoing complaints, are noted.

In accordance with the Water Services Act 2013, the responsibility for the provision of public water supply, wastewater collection and treatment services, transferred from the remit of the local authorities to Irish Water (IW).

Since 2014, Irish Water has been responsible for the operation of public water services including *inter alia* the management and maintenance of water assets and infrastructure. Ongoing issues regarding malodours emanating from Drogheda's Waste Water Treatment Plant are an operational matter relating to Irish Water. Currently, Irish Water is actively endeavouring to address these issues with EPS which is the company managing the plant under a long-term Operation and Management contract. As such, issues of malodour lie outside the remit of the Louth County Development Plan.

Chief Executive's Recommendation:

No Change