Frank Pentony  
Director of Services  
Development Plan Review  
Forward Planning Unit  
Louth County Council  
Town Hall, Crowe Street,  
Dundalk, Co Louth.  
A91 W20C

25th November 2019

RE: Louth County Development Plan Review  
Submission on behalf of Moffett Investment Holdings

Dear Mr Pentony,

With reference to the above, and further to your invitation to the public to make submissions in respect of the making of a new Development Plan for County Louth, please note that we have been appointed by Moffett Investment holdings to make this submission on their behalf.

Please find attached contact details for our client separately as directed.

Background:

Our client This submission does not relate to any particular lands, rather to North Drogheda and Drogheda generally.

Please note that our client feels that Drogheda and it’s Northern Environs is an appropriate location for residential development, due to a number of strategic and locational factors including;

- Government Policy – The Rebuilding Ireland Action Plan on Housing and Homelessness supports the need for residential development on sites within and contiguous to existing urban areas,
- Drogheda’s status as a regional centre in the National Planning Framework – Ireland 2040,
- Drogheda’s strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry,
- Drogheda’s status as a Regional Growth Centre within the Regional Spatial & Economic Strategy for the Eastern and Midlands Region and its status as the only regional growth centre within the hinterland area of the Greater Dublin Area,
• North Drogheda Environs together with Drogheda is identified as a Large Growth Town at the top of the settlement Hierarchy (with Dundalk) within the current County Development Plan (CDP),

• Drogheda’s strong town centre, its capacity in terms of services and infrastructure, and its capacity in terms of social facilities and amenities,

• Drogheda’s significant potential for employment growth, which can complement compact residential growth,

• Drogheda has excellent public transport links including rail transport and public and private bus services.

As such, we would respectfully suggest that Louth County Council include an appropriate set of policies and objectives in the new County Development Plan that will support the development of North Drogheda Environs together with Drogheda generally.

We understand that following adoption of the County Plans by Louth and Meath County Council’s a joint Urban Area Plan will be prepared for Drogheda. The scope and extent of that plan is yet to be determined. In our opinion, it is imperative that the new county development plan should clearly set out Louth’s vision for its largest town.

In particular, we ask that the new county development plan provide clarity which is currently lacking in relation to the zoning status of North Drogheda Environs, and we seek the removal of phasing barriers to development which were imposed by the current CDP Core Strategy.

Key Issues

• The potential expiry of the LAP and the residential Masterplan have left the zoning status unclear. I’m aware that the Planning Department has advised that residential lands at North Drogheda are no longer zoned. It has been further suggested by the Planning Department that due to over zoning of lands in Drogheda and Meath’s Southern Environs, that there would be no rationale to re-zone these lands. It is my understanding that unless a L.A.P. has a stated period to which it applies, then it will remain in place until revoked or reviewed. Legal opinion may differ however, but the uncertainty is a very significant barrier to development and investment in the area. The C.D.P. review provides an opportunity for clarity to be restored, and a clear vision for Drogheda and the Northern Environs to be developed.

• All North Drogheda is at a disadvantage with respect to the southern environs of Drogheda which no longer has any phasing restrictions. A recent A.B.P. decision to grant permission for a strategic housing development on ‘Phase 2’ lands coupled with M.C.C.s documented intention to remove all phasing restrictions (due to Drogheda’s status in the National Planning Policy context) mean that there are effectively no residentially zoned lands in the Co. Meath part of Drogheda subject to phasing.
National and Regional Policy

The National Planning Framework (NPF), Ireland 2040 contains numerous relevant objectives and policies as follows:

- The NPF sets out policy in relation to housing development and future population growth. It set a target for 40% of new housing development to be located within and contiguous to the existing ‘footprint’ of built up areas.

- Growth of 490,000 to 500,000 people is planned for the Eastern and Midlands region.

- The NPF identifies Drogheda as a regional growth centre and recognises its strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry.

- National Policy Objective 2b states ‘The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy’.

- National Policy Objective 7 aims to ‘Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on: Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor’.

- National Policy Objective 11 states: ‘In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth’.

- National Policy Objective 27 seeks to ‘Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages’.

- National Policy Objective 33 aims to ‘Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location’.

- National Policy Objective 44 states; ‘In co-operation with relevant Departments in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility’.

In summary, the NPF requires planned growth at locations that can sustain such development. It demands compact development within urban areas and provides that where the expansion of settlements takes place it should be delivered in a sustainable, compact manner.
The National Development Plan 2018 – 2027 sets out the main investment projects, programmes and priorities envisaged over the next decade in order to drive the implementation of the NPF.

The NPF states that the Dart Expansion Programme will see Drogheda serviced by DART by 2027, which will provide fast, high-frequency electrified services to Drogheda.

Eastern Midlands Regional Assembly - Regional Spatial and Economic Strategy (RSES)

- The vision statement of the RSES is ‘to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all’.

- The RSES supports the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP) and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region.

- Drogheda is defined as a Regional Growth Centre in the RSES in accordance with the NPF. It enjoys a strategic location on the Dublin-Belfast economic corridor and the cross-border network of Drogheda-Dundalk-Newry. Drogheda is the only regional growth centre within the hinterland area of the Greater Dublin Area. The RSES defines Regional Growth Centres as being ‘large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area’.

- In relation to the Dublin to Belfast Corridor the RSES states: “The Dublin – Belfast Economic Corridor comprises an internationally important spine connecting the two largest settlements on the island of Ireland via the regional growth centres of Drogheda, Dundalk and Newry.”

- The RSES acknowledges that the ‘compact and focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale’ is an enabler for the Dublin - Belfast Corridor reaching its full potential.

- On Page 50, the RSES states that prioritisation is more appropriate than de-zoning of land where there may be a surplus. The National Planning Framework and the NPF Implementation roadmap do not seek de-zoning of land.

- On Page 61, the RSES states: “Key priorities are to promote the continued sustainable and compact growth of Drogheda as a regional driver of city scale with a target population of 50,000 by 2031. The objective is to provide for the regeneration of the town centre, the compact planned and co-ordinated growth of the town’s hinterland along with enhancing Drogheda’s role as a self-sustaining strategic employment centre on the Dublin-Belfast Economic Corridor.”

- The RSES supports ‘the direction of significant population and economic growth towards the key Regional Growth Centres of Athlone, Drogheda and Dundalk. These towns located outside the Dublin Metropolitan Area are, in addition to Dublin, critical to the implementation of effective regional development as set out in the NPF. They will accommodate significant new investment in housing, transport and employment
generating activity. They are important self-sustaining centres that act as economic drivers for the Region, capitalising on their strategic location and high-quality connections to Dublin.

- Regional Policy Objective 4.11 states that “A cross boundary statutory Joint Urban Area Plan (UAP) for the Regional Growth Centre of Drogheda shall be jointly prepared by Louth and Meath County Councils in collaboration with EMRA. The UAP will support, the development of Drogheda as an attractive, vibrant and highly accessible Regional Centre and economic driver. The Joint UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.”

- Future development required to achieve the growth vision for Drogheda included in the Joint UAP shall:
  - “Provide for the sustainable, compact, sequential growth and urban regeneration in the town core by promoting the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.
  - Support the regeneration of the Westgate area of Drogheda’s historic town centre to address vacancy and dereliction in the town core and as an alternative option to new development on greenfield sites.
  - Facilitate the regeneration of lands at McBride Station to capitalise on existing and planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.
  - Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.
  - Support the sustainable development of existing zoned lands in the northern and southern environs of the town with a particular emphasis on the promotion of the IDA Business Park as a location for economic investment and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs.
  - Support the implementation of the Urban Design Framework Plan for the Heritage Quarter.”

- Regional Policy Objective 4.12 relates to Drogheda Port and the delivery of the PANCR.

**Current Development Plan Policy**

The current C.D.P. says at Section 1.3.1. states that due to obligations imposed by the Planning Act 2000 (as amended) a Local Area Plan for ‘Drogheda and Northern Environs’ will be prepared, and the timing would ‘be determined by the relevant legislative provisions.’ This hasn’t happened yet.
Section 2.16.2 remarks that the population of Drogheda including the Northern Environs) was 32,453 in 2011 and that there has been considerable growth since then. It references its role as a 'commuter town'.

Section 2.16.3 of the current CDP describes the 2004 Lap for Northern Environs of Drogheda. It says that a single LAP will be prepared during the lifetime of the CDP for Drogheda and the Northern Environs Area. This hasn’t occurred. The 2004 Lap was never reviewed and as such, its status is unclear. It could be argued that it expired 5 years before Section 2.16.3 was written and that the lands which were zoned by that LAP are no longer zoned.

Section 2.16.4 says that the 2015 – 2021 CDP is an overarching Development Plan for the entire county including Dundalk and Drogheda. The text of this paragraph seems to extend the period of the development plans for Drogheda and Dundalk to match the County Plan expiry date. This doesn’t seem to be the case for the North Drogheda Environs LAP.

A specific policy objective is included with respect to Drogheda’s plans:

**SS 4 To review the Drogheda Borough Council Development Plan 2011-2017 and to prepare a Local Area Plan for Drogheda and Environs which will be consistent with the provisions of the County Plan.**

No such review occurred.

Please also refer to table 2.4 from Chapter 2 of the current CDP. This table allocated future population growth to particular settlements or groups of settlements. Drogheda has been provided with an allocation of 950 residential units for the plan period. This compares with 1,600 for Dundalk, an imbalance (given their equal status) that was not explained. I note too that Louth Co Co had allocated 351 units to be built in the open countryside – a practice that we contend must change.

<table>
<thead>
<tr>
<th>Settlement Type</th>
<th>Projected Population 2016</th>
<th>Projected Population 2021</th>
<th>Increase in Population</th>
<th>Equivalent Residential Units</th>
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<tbody>
<tr>
<td>Louth</td>
<td>132,648</td>
<td>141,050</td>
<td>8,402</td>
<td>3,111</td>
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<tr>
<td>Dundalk &amp; Environs</td>
<td>42,300</td>
<td>46,622</td>
<td>4,322</td>
<td>1,600</td>
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<td>Drogheda &amp; Northern Environs</td>
<td>35,373</td>
<td>37,944</td>
<td>2,571</td>
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<td>Ardee</td>
<td>4,841</td>
<td>4,970</td>
<td>129</td>
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<td>Dunleer</td>
<td>1,668</td>
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<td>Level 3 Settlements</td>
<td>13,689</td>
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<tr>
<td>Level 4 Settlements</td>
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<td>Rural Area</td>
<td>32,774</td>
<td>33,722</td>
<td>948</td>
<td>351</td>
</tr>
</tbody>
</table>
Section 7.3.10 of the CDP sets out a ‘road improvement programme’ for the plan Period. Table 7.8 lists new Strategic Roads, and it includes the Port Access Northern Cross Route among other projects. No mechanism or time line for delivery is provided. Table 7.7 lists National road projects to be delivered in the Plan period. There has been little or no progress on any of the planned works. The ‘programme’ appears to be aspirational.

Discussion

The current core strategy for Co. Louth has defined all of North Drogheda Environs as Phase 2 despite the extant planning applications. This means that any application for development on these lands (other than as a variation to an existing permission) would be a material alteration of the CDP.

Large parts of the southern environs of Drogheda in Co. Meath were also subject to phasing restrictions. Meath Co Co have prepared a draft County Development Plan which is due to go on public display on 18th December next. We understand that it will remove all phasing restrictions in South Drogheda. This is due to their interpretation of the NPF and RSES and their view appears to be supported by a recent SHD permission granted by An Bord Pleanala for multiple residential units on phase 2 lands at Bryanstown. We believe that removal of the phasing restrictions should form part of the policies and objective for Drogheda in line with MCCs policies.

We believe that the phasing restrictions unfairly limits the development of lands with no planning permission, particularly considering the lack of delivery pertaining to those lands with permission. The phasing restriction affects the viability of those lands with permission in that it undermines investor and funding confidence. Extant permissions are compromised by outdated conditions limiting phasing and delivery of shared infrastructure outside the control of any one landowner. The phasing restriction prevents new ‘cleaner’ planning permissions from being assessed by the Planning Authority and this affects the ability of developers and landowners to attract investment for the area.

Uncertainty relating to the current zoning status of the lands, given that the 2004 hasn’t been reviewed or extended by the current CDP, seriously affects the value of lands in the area and that affects the ability of landowners and developers to attract the investment required to service the lands and deliver much needed housing. The zoning status must be clarified in any new development plan, and this uncertainty should not be allowed to continue unnecessarily. No delay whilst the content or mechanism for agreeing a joint UAP with MCC should be permitted. Louth Co Co must take this opportunity to underline its intentions and support for the development of North Drogheda Environs as set out in the vision provided by the 2006 Residential Masterplan.

We believe that the new development plan should reinforce the role and function of the PANCR. This planned road is a vitally important piece of infrastructure which is required to
take port traffic out of Drogheda and free up capacity in many of the towns congested junctions. Its function as referred to in RPO 4.12 of the RSES as being related to the Port only and this requires clarification. The new CDP should set out its role and function and set out a delivery mechanism, perhaps in phases from R132 to Twenties lane, then to Ballymakenny Road, Termonfeckin Road and finally to the Port. Current policies and objectives in the now expired North Drogheda Environments Plan require it to be delivered in one single contract. This is not feasible. We would respectfully suggest that the planning authority engage constructively with stakeholders in this regard to discuss a viable delivery mechanism to be included as policy in a new CDP.

Summary and Conclusion

It is respectfully submitted that the clarification of the policy context for North Drogheda is of the utmost importance if investment is to be achieved for the delivery of infrastructure and housing needed to realise national and regional policy objectives. The policy context is the most important step in realising the compact, planned growth of this hinterland of Drogheda, on lands contiguous with the built-up area, in a well-planned, sustainable manner.

I trust that this is to your satisfaction and that you will take the forgoing into consideration when preparing a draft Development Plan for 2019 – 2025

Yours Faithfully

Brian Hughes
BA BAI CEng MIEI,
Chartered Engineer