

Comhairle Contae Lú
Louth County Council

Louth County Development Plan 2027-2033

Chief Executive Report on Submissions Received in response to the Pre-Draft Strategic Issues Paper

January 2026



TABLE OF CONTENTS

Louth County Development Plan 2027-2033	1
SECTION 1 INTRODUCTION AND CONTEXT.....	1
1.1 Introduction and Context.....	2
1.1.1 Legislative Requirement	2
1.1.2 Commencement of Chapter 5 'Development Plans' in Part 3 of the Planning and Development Act 2024	3
1.1.3 Legislative Requirement for the preparation of a Chief Executive Report	3
1.2 Pre-Draft Consultation Process.....	4
1.2.1 Customer Service Counters.....	4
1.2.2 Libraries.....	4
1.2.3 Online.....	4
1.2.4 Public Notices	5
1.2.5 Public Consultation Events	5
1.2.6 Email	5
1.2.7 Social Media	6
1.2.8 Submissions Received	6
1.3 Approach to Consideration of Submissions.....	6
1.4 Next Step	6
SECTION 2 SUMMARY OF ISSUES RAISED IN RESPONSE TO THE PRE-DRAFT ISSUES PAPER AND THE PLANNING AUTHORITY'S RESPONSE	8
2.1 Summary of Issues Raised in Relation to General Submissions/ Observations and Chief Executive's Opinion and Recommendation	9
2.2 Summary of Issues Raised in Submissions Relation to Dundalk to Carlingford Greenway Project and CPO Concerns / Observations and Chief Executive's Opinion and Recommendation	282
2.3 Summary of Issues Raised in Submissions in Relation to Large Scale Renewable Energy Projects and Environmental Concerns / Observations and Chief Executive's Opinion and Recommendation.....	286
APPENDICES	292
Appendix 1 – Newspaper Notice.....	293
Appendix 2 - List of Submissions Received	296



Appendix 3 - List of Prescribed Bodies Notified	312
Appendix 4 - List of Elected & Oireachtas Members Notified	313
Appendix 5 – Stakeholders & Others	314
Appendix 6 - List of Primary Schools Notified.....	316
Appendix 7 – List of Post Primary/Third Leve Schools/College Notifie	317
Appendix 8 - List of Early Childcare Facilities Notified.....	318



Comhairle Contae **Lú**
Louth County Council

Section 1

Introduction and Context



1.1 Introduction and Context

1.1.1 Legislative Requirement

The current Louth County Development Plan was adopted on the 30th September 2021 for the period 2021-2027. Louth County Council commenced the review of the current County Development Plan and the preparation of the new County Development Plan in September 2025 and in accordance with Section 11(1) of the Planning and Development Act 2000 (as amended) a newspaper notice was published on the Tuesday 23rd September 2025 (see Appendix 1).

As the review of the Development Plan was commenced under the Planning and Development Act 2000 (as amended), the new Development Plan will cover the period 2027-2033 and will set out the strategic land use and planning policy for County Louth having regard to the National Planning Framework, the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly, planning policy documents and any other relevant government guidance.

To encourage engagement and support participation with local residents, public sector agencies, non-governmental agencies, local community groups, children/groups representing children, sports groups, as well as commercial and business interests within the area, a Pre-Draft Strategic Issues Paper was published. The Pre-Draft Strategic Issues Paper set out a broad overview of the challenges and opportunities within the county, under the following themes:

- Core Strategy;
- People and Places;
- Economic and Employment Development;
- Retailing and Town Centre First;
- Rural Development and Natural Resources;
- Transport, Connectivity and Movement;
- Water, Energy and Communications;
- Climate Action and Flooding;
- Green Infrastructure;
- Natural & Built Heritage;
- Tourism, Culture and Art;
- Community, Recreation, Amenity and Social Inclusion; and
- Environmental Assessments.



1.1.2 Commencement of Chapter 5 ‘Developments Plans’ in Part 3 of the Planning and Development Act 2024

Chapter 5 of Part 3 the Planning and Development Act 2024 ‘Development Plans’ commenced on the 31st December 2025. On the same date Chapter I ‘Development Plans’ and Chapter II ‘Local Area Plans’ of Part II of the Planning and Development Act 2000 (as amended) were repealed. Provision is included in the 2024 Act (as amended) for scenarios when a Development Plan review commenced under the 2000 Act prior to it being repealed. This provision allows the relevant provisions of the 2000 Act to continue to have effect. The preparation of the new Louth County Development Plan will therefore continue to be prepared under the relevant sections of the Planning and Development Act 2000 (as amended).

Section 69(1) of the Planning and Development Act 2024 (as amended) provides that:

“(1) Where a notice of intention to review an existing development plan and prepare a new development plan is given under subsection (1) of section 11 of the Act of 2000 before the commencement of the repeal of Part II of the Act of 2000 by section 6 –

- (a) Parts II and XAB, and Chapter III of Part IIB, of the Act 2000 shall, on and after that repeal, continue to apply and have effect for the purposes of that notice.*
- (b) That existing development plan may, subject to the said Parts II and XAB and the said Chapter III, be reviewed on or after that repeal, and*
- (c) Such new development plan may, subject to the said Parts II and XAB and the said Chapter III, be prepared on or after that repeal,*

and any such new development plan prepared in accordance with this subsection shall have effect as if it were a development plan made under this Chapter and, accordingly, references in this Act to a development plan shall be construed as including references to such new development plan.”

1.1.3 Legislative Requirement for the preparation of a Chief Executive Report

Section 11(4)(a) of the Planning and Development Act 2000 (as amended) requires the Chief Executive, not later than 16 weeks after giving notice that the Development Plan is to be reviewed, to prepare a report on the submissions and observations received to the initial public consultation process of the Pre-Draft Plan. In accordance with Section 11(4)(b), the Chief Executive’s Report must:

- i) List the persons or bodies who made submissions or observations, as well as any persons or bodies consulted by the authority (See appendices).
- ii) Summarise the issues raised in the submissions and during the consultations, where appropriate.
- iii) Give the opinion of the Chief Executive to the issues raised. In this regard, the Chief Executive’s opinion must take into account:
 - The proper planning and sustainable development of the area,
 - The statutory obligations of any local authority in the area,



- Any relevant policies or objectives for the time being of the Government or any Minister of the Government,
- State the Chief Executives recommendations on the policies to be included in the Draft Development Plan.

Submissions pertaining to the zoning of land shall not be considered at this stage of the Development Plan review process as outlined under Section 11(4)(b)(ii) of the Planning and Development Act 2000 (as amended).

1.2 Pre-Draft Consultation Process

The Pre-Draft Strategic Issues Paper was placed on public display from Tuesday 23rd September 2025 to Friday 21st November 2025 (inclusive).

The key components of the Pre-Draft consultation process were:

- An invitation to individuals, stakeholders and interest groups to make submissions; and
- Public consultation events.

The documents were available to view at the following locations:

1.2.1 Customer Service Counters

- County Hall, Millennium Centre, St. Alphonsus Road, Dundalk, Co. Louth, A91 KFW6
- Civic Offices, Fair Street, Drogheda, Co. Louth, A92 P440
- Town Hall, Crowe Street, Dundalk, Co. Louth, A91 W20C
- Mid Louth Civic Services Centre, Fairgreen, Ardee, Co. Louth A92 RYT2

1.2.2 Libraries

Documentation was available to view all libraries in the County (Dundalk, Drogheda, Ardee, Dunleer and Carlingford).

1.2.3 Online

Online access to the Pre-Draft Issues Paper was provided via the Council's Online Consultation Portal (<https://consult.louthcoco.ie/en/consultation/issues-paper-pre-draft-stage-louth-county-development-plan-2027-2033>) where all documents associated with the Pre-Draft Issues Paper were available to view/download.



1.2.4 Public Notices

An advertisement was placed in The Argus, Dundalk Democrat, Dundalk Leader, Drogheda Leader, Drogheda Independent and Drogheda Life notifying the public of the consultation process for the Pre-Draft Strategic Issues Paper for the Louth County Development Plan 2027-2033.

Copies of the Pre-Draft Strategic Issues Paper and public notice were issued to prescribed bodies, including government departments and other agencies, as required by the Planning and Development Act 2000 (as amended).

1.2.5 Public Consultation Events

The aforementioned public consultation events took place at the following locations and dates:

Location	Date (s)	Time
Carlingford Library, Newry Street, Carlingford, Co. Louth, A91 N226	Tuesday 14 th October, 2025	6pm-8pm
Dunleer Library, Main Street, Dunleer, Co. Louth, A92 DRV0	Tuesday 21 st October, 2025	6pm-8pm
Dundalk Library, Roden Place, Dundalk, Co. Louth A91 RC44	Wednesday 22 nd October, 2025	5pm-7:30pm
Drogheda Library, Stockwell Lane, Drogheda, Co. Louth, A92 PY20	Wednesday 5 th November, 2025	5pm-7:30pm
Ardee Library, Market Square, Ardee, Co. Louth, A92 XH22	Thursday 6 th November, 2025	5pm-7:30pm

1.2.6 Email

Email notification was issued to the following:

- Prescribed Bodies
- Elected Members
- Schools (Primary, Post-Primary and Third Level)
- Louth Public Participation Network (PPN)
- Louth Local Enterprise Office stakeholders
- Louth Economic Forum
- Other stakeholder groups and individuals.



1.2.7 Social Media

Louth County Council also utilised social media including Facebook and Twitter to advertise the Pre-Draft Strategic Issues Paper for the Louth County Development Plan 2027-2033. There were 10,378 “hits” during the public consultation period.

1.2.8 Submissions Received

463 submissions were received during the Pre-Draft consultation period as set out in Table 1 below:

Total Number of Submissions Received	Via Consultation Portal	In Writing
463	201	262

A list of all submissions received is set out in Appendix 2 of this Report.

1.3 Approach to Consideration of Submissions

Following the initial recording and review of submissions, it was apparent that there was a commonality in terms of some themes raised therein. A substantial number of submissions were received in relation to the following topics:

- Dundalk to Carlingford Greenway Project and CPO concerns and,
- Large Scale Renewable Energy Projects and Environmental concerns

If these submissions were addressed individually it would result in an extremely lengthy, voluminous and repetitive document. Therefore, in the interests of clarity, brevity, ease of access and completeness, it was considered appropriate to amalgamate the submissions under specific topics and provide a corresponding Chief Executive response and recommendation to each topic thereafter. The structure of Section 2 is outlined below:

Section 2.1: Chief Executive summary, response, and recommendation to general submissions.

Section 2.2: Chief Executive summary, response, and recommendation to submissions in relation to the Dundalk to Carlingford Greenway Project and CPO concerns.

Section 2.3: Chief Executive summary, response, and recommendation to submissions in relation to Large Scale Renewable Energy Projects and Environmental concerns.

1.4 Next Steps

The Chief Executive’s Report must be prepared not later than 16 weeks after giving notice of the review of the Development Plan. The said Report must be submitted to the Members or to a committee of the planning authority, as may be decided by the members of the authority, for their consideration. This Report is being distributed to the members of Louth County Council on Thursday 22nd January 2026.



Following consideration of the report, the members of the planning authority or of the committee, as the case may be, may issue directions to the Chief Executive regarding the preparation of the Draft Plan (Section 11(4)(d) of the Planning and Development Act 2000 (as amended)). These directions might consist of concerns that Members would like to see addressed or policies or objectives that Members would like to see incorporated into the Draft Plan. Any such directions must:

- Be strategic in nature,
- Be consistent with the draft core strategy,
- Take account of the statutory obligations of any local authority in the area, and
- Take account of any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

Directions by the Members to the Chief Executive must be issued not later than 10 weeks after the submission of the Chief Executive's Report. Section 11(5)(a) of the 2000 Act requires that not later than 12 weeks following receipt of any direction from the members, the Chief Executive shall prepare a Draft Development Plan and submit it to the Members of the planning authority for their consideration.

The Members then have an eight-week period within which to consider the proposed Draft Development Plan, and it shall be deemed to be the Draft Development Plan unless the planning authority by resolution amends the Draft Plan. The Chief Executive shall comply with any such directions. In issuing directions, Section 11(4)(f) of the 2000 Act states that the Members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates.



Section 2

Summary of Issues Raised in Response to the Pre-Draft Issues Paper and the Chief Executive's Response

2.1 Summary of Issues Raised in Relation to General Submissions/Observations and Chief Executive’s Opinion and Recommendation

Submission Ref. No:

LH-C144-DPIP-01

Submitted By:

Paul Gilgunn

Image illustrating junction subject to Submission:



Figure 1: Google Streetview image illustrating the junction subject of this submission.

Summary of Main Issues Raised:

The submission raises concerns in relation to road safety at the ‘V’ junction between the L7165 and L3168 in close proximity to the entrance to Dundalk Famine Graveyard as illustrated in Figure 1 above.

There is a severe bend on the Ardee Road at the ‘V’ junction and there have been several accidents on this stretch of the road. The L7165 is being used by articulated lorries on a regular basis which is a concern for other motorists and pedestrians due to the speed limit and the narrow width of the road (lorries cross the white line on the middle of the road which result in cars driving along the grass verge to get past). Furthermore, the submission cites concerns for pedestrians visiting the Famine Graveyard.

The submission requests that the following:

- Include a policy requiring road signs to advise of a dangerous junction ahead and provide traffic calming measures such as speed ramps and street lighting in this location.
- For landowners of the lands on either side of the road at the ‘V’ junction to cut back trees in the interest of road safety.

Safety is considered paramount at this site due to proximity to Dundalk Famine Graveyard and their visitors.

Chief Executive Opinion on Issues raised:

The Chief Executive notes the concerns set out within the submission in relation to road safety at the ‘V’ junction at the L7165 and L3168 Ardee Road. While the provision of road signage, traffic calming measures,



public lighting and the cutting down of trees along the public road is an operation issue outside of the scope of the review of the County Development Plan, the Chief Executive notes that the Operations Section carried out works in December 2025 along the Ardee Road to improve road safety including road markings 'SLOW', 'STOP' and re-painted white line markers and provision of cat's eyes road studs.

The current Development Plan includes a policy objective in support of investment and improvements to public road infrastructure (MOV 47). The Draft Plan will continue to provide support for road improvements in the County.

Chief Executive Recommendation:

To continue to provide a policy objective to support investment and improvements to the public road infrastructure in the County.

Submission Ref. No:

LH-C144-DPIP-2

Submitted By:

Health and Safety Authority (HSA)

Summary of Main Issues Raised:

The submission from the HSA sets out that the Development Plan should contain:

1. Planning policy in relation to major accident sites notified under the regulations.
2. Consultation distances and advice provided by the HAS, where applicable. Distances should be indicated on maps.
3. A policy on the siting of new major hazard establishments including developments in the vicinity of such establishments.
4. Reference should be made to the following notified establishments and their consultation distances: BAK Bulk Services, Red Barns, Dunleer 300m; Cooley Distillery 400m; Flogas Ireland Limited, Drogheda 600m.

Chief Executive Opinion on Issues raised:

Current land use planning policy surrounding major hazard establishments and SEVESO sites (Policy Objectives ENV 27 and ENV 28 of the LCDP 2021-2027) will be transposed into the Draft plan and updated as required to take account of any recommendations by the Health and Safety Authority or recent changes to legislation. Any associated narrative and maps will also be amended as required.

Chief Executive Recommendation:

To update consultation distances and other guidance surrounding Major Accident Hazard and SEVESO sites as required.



Submission Ref. No: LH-C144-DPIP-3
Submitted By: Cllr Dolores Minogue

Summary of Main Issues Raised:

The submission sets out that the Dunleer railway station should be retained and protected as a future public transport corridor and the reopening would be an investment in sustainable transport infrastructure in line with national and regional transport and climate objectives.

Concerns that the redevelopment of the station for other uses jeopardises the opportunity to reopen the railway station.

Necessity to safeguard the station for future transport development.

Chief Executive Opinion on Issues raised:

While the final decision on rail services is made at a national level by agencies including the National Transport Authority, Iarnród Éireann, and the Department of Transport, the importance of continued investment and upgrades to rail infrastructure in the further growth and development of Louth is recognised. This includes the re-opening of Dunleer rail station.

Current Policy Objectives (MOV 8, MOV 9) stipulates that the Council is aiming to alter the current modal share that exists in Louth and that the move towards sustainable transport would be encouraged while Policy Objective MOV 19 seeks to examine the feasibility of reopening the rail station in Dunleer.

Creating sustainable communities that promote sustainable travel will also be a key objective of the Draft Plan and retaining the infrastructure will help deliver on this.

Chief Executive Recommendation:

To include policy support in the Draft Plan that enhance existing rail infrastructure to encourage a modal shift towards sustainable transport.

Submission Ref. No: LH-C144-DPIP-4
Submitted By: Cllr Shane McGuinness

Summary of Main Issues Raised:

The submission sets out concerns in relation to parking provision at Dundalk Clarke Train Station and would support a specific policy objective under the new development plan for a new 'halt' type railway station South of Dundalk at Killally/Crumlin.

The submission sets out that this area of Dundalk is likely to grow in terms of population and development, and that a potential new station and associated car parking could serve the future population.

The submissions suggests that a station that works in conjunction with Junction 16 of the M1 as a park and ride facility which could cater for an extension of the DART network.

The provision of a new station would not affect Dundalk Clarke station, which would continue to serve all users



in Dundalk town centre and people who cycle/walk and live nearby.

Chief Executive Opinion on Issues raised:

Creating sustainable communities through the increase in sustainable transport usage, as well as increasing connectivity amongst communities will be a key objective of the Draft Plan.

While the final decision on rail services is made at a national level by agencies including the National Transport Authority, Iarnród Éireann, and the Department of Transport, the importance of continued investment and upgrades to rail infrastructure in the further growth and development of Louth is recognised.

The DART+ Coastal North Project currently terminates at MacBride Rail Station in Drogheda however it is recognised that if, in the future it is extended to Dundalk, an additional stop in the south Dundalk area to serve the residents of this part of the town and surrounding catchment would make rail travel in this part of the town more accessible.

Chief Executive Recommendation:

To include policy support in the Draft Plan that enhance existing rail infrastructure to encourage a modal shift towards sustainable transport.

Submission Ref. No: LH-C144-DPIP-5
Submitted By: Eoin Reid

Summary of Main Issues Raised:

The submission relates to the Raynoldstown/Haynestown area and sets out observations under the following headings:

Settlement and Growth

Housing has been planned for the Raynoldstown area for years and it is now a well-established residential area. The submission sets out that it should be recognised in the new Plan as part of Dundalk’s southern growth area to ensure that any future growth is supported by the right infrastructure, transport and facilities.

Transport, Movement and Road Safety

Traffic in the area has increased and the Western Infrastructure Route has still not been provided.

There are no safe walking or cycling routes that connect to schools, shops or sports clubs.

The levels of traffic on the Dublin Road has increased making it difficult to cross the road on foot or by bike, especially near the entrance to Raynoldstown and in proximity to Sexton’s. The submission requests traffic calming measures for this area are provided in the new Plan such as lower speed limits, pedestrian crossings and improved public lighting.

There is no public transport link between Raynoldstown and Blackrock or across town and no bus stops in close proximity to the houses at Raynoldstown. The submission requests more regular local bus routes, new bus stops within walking distance and proper cycle and walking paths that connect the area to Blackrock and Dundalk town centre.



Community and Social Facilities

Limited school and childcare availability in the area. The new Plan should cater for another primary school and childcare facilities locally.

There is no proper park, playground or community space serving this area.

Local Services

Permission was granted at The Village Green for a creche, medical centre, pharmacy, café and shops however there has been no progress with the implementation of this permission. The Council should ensure that such projects are progressed.

Climate and Quality of Life

The Issues Paper refers to sustainable communities and reduced car use. In order to achieve this in Raynoldstown/Haynestown, improved connectivity such as greenery and trees, proper paths and active travel infrastructure, safe crossings and better public lighting are required.

Chief Executive Opinion on Issues raised:

The population growth in the south Dundalk area is recognised, and the Dundalk Local Area Plan 2025-2031 and the current County Development Plan (2021-2027) includes a Spot Objective (No. 1 Dundalk – Raynoldstown Village) to ensure future growth is supported by adequate community facilities.

A Local Transport Plan was prepared for Dundalk and published alongside the Dundalk Local Area Plan 2025-2031. The purpose of this Transport Plan was to reduce travel demand and achieve a modal shift towards more sustainable modes of transport. Included in this Transport Plan are active travel measures to improve footpaths, cycle lanes, crossings, and junctions along the Dubin Road from the Xerox Junction to Greengates (Option 57 in Table 5.2). The Transport Plan also seeks to improve the Town Bus Service and includes a proposal for a revised Urban Bus Network. The delivery of these projects are subject to the availability of funding however the Draft Plan will include policy objectives supporting their delivery.

The importance of the new link road from L-3161 Marlbog Roundabout to L-7163 Chapel Road Roundabout (as outlined in Table 7.8 of the LCDP 2021-2027) is noted however the specific timeline for funding and construction of this road is an operational issue which is outside of the scope of the County Development Plan.

As part of the preparation of the new Plan, land use zonings will be reviewed. The Social Infrastructure Audit prepared as part of the Dundalk Local Area Plan will inform the County Development Plan, as it relates to Dundalk to ensure that adequate facilities are available to serve the population. In relation to school provision, the Council will continue to work in partnership with the Department of Education in the delivery of school facilities in the town at appropriate locations.

In relation to the concerns regarding the delivery of planning permission granted at The Village Green for a range of community facilities, this is outside of the scope of the Development Plan.

The suggestions for improving movement to promote reduce car use and sustainable communities are noted and the Draft Plan will support improvements to permeability and connectivity and the implementation of active travel measures and the implementation of measures and options contained within the Local Transport Plan for Dundalk.

Chief Executive Recommendation:

To support the implementation of improvement measures and options/projects contained within the Local Transport Plan.



To include policies that support improvements to connectivity and permeability and the implementation of active travel measures to provide increased opportunities for more sustainable forms of transport including walking and cycling.

To continue to engage proactively with the Department of Education to identify requirements for school facilities and to zone lands appropriate and provide policy objectives in support of their development.

To continue to support the provision of social and community facilities to meet the requirements of the existing and future population.

Carry out a review of all land use zonings and if considered necessary additional land will be zoned for recreation and/or community purposes.

Submission Ref. No:

LH-C144-DPIP-6

Submitted By:

Cllr Shane McGuinness

Map showing land subject to Submission:



Figure 1: Map included as part of submission outlining the area subject of this submission.

Summary of Main Issues Raised:

The submission seeks the expedited construction of the Link Road from L-3161 Marlbog Roundabout to L-7163 Chapel Road Roundabout which has been a long-standing objective of the County Development Plan.

This road is needed as a matter of urgency and concerns are raised regarding the use of a road with a primary school on it by lorries as a shortcut to the M1 motorway. There will be a growing need for this road arising from the community zoning in close proximity which would have the possibility for a secondary school.

Chief Executive Opinion on Issues raised:

While the issues of congestion and the importance of the new link road (as outlined in Table 7.8 of LCDP 2021-



2027) are noted, the specific timeline for funding and construction of this road is an operational issue and outside the scope of the County Development Plan.

To alleviate traffic along the Chapel Road, the Draft Plan will encourage the improvement of active, accessible and sustainable transport, which may improve the issues raised with lengthening of single-file traffic jams, especially considering the access to the school and potentially other community uses.

Chief Executive Recommendation:

To include policy objectives supporting a modal shift and improvements to public transport.

Submission Ref. No:

LH-C144-DPIP-7

Submitted By:

CLlr Shane Mc Guinness

Summary of Main Issues Raised:

The continued expansion of Dundalk Sports Centre at Hoey's Lane is positive, however it is not understood why there is continued investment and expansion in one location.

There is a lack of open community and amenity spaces in Dundalk South and specifically Blackrock and Haggardstown. A masterplan of the entire town of Dundalk South needs to be looked at as far as the Fane River, to at least show the location of playgrounds, parklands, forests, community fields and open spaces. This is the most populated area and will continue to grow in the next 5 to 10 years.

Concerned are raised that previous Councils have neglected to think outside the box, forward thinking required in relation to land bank.

Young people and the next generation need open space for their mental and physical health.

Chief Executive Opinion on Issues raised:

The importance of community, recreation and sports facilities in the creation of sustainable, walkable and socially inclusive neighbourhoods is acknowledged. A Social Infrastructure Audit was carried out as part of the review of the Dundalk Local Area Plan this, and any recreation strategy produced by the Council will inform the Draft Plan. An analysis of all land use zonings will also be carried out in the preparation of the Draft Plan, and the Council will investigate the possibility of zoning additional lands 'G1 Community Facilities' or 'H1 Open Space' where a need is identified.

Chief Executive Recommendation:

Carry out a review of all land use zonings and if considered necessary additional land will be zoned for recreation and/or community purposes.

The policy objectives contained in the Draft Plan will continue to support the provision of community and recreation facilities.

Submission Ref. No:

LH-C144-DPIP-09

Submitted By:

Keith Ludlow Architects on behalf of Des Gaffney

Map showing land subject to Submission:



Figure 1: Map included as part of submission.

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 0.1853ha of land located at Donore Road, Drogheda, from H1 Open Space to A1 Existing Residential.

The subject lands are located south of the River Boyne and opposite the bus depot. Historically the lands housed a farmstead which had since fallen into disrepair following a fire. Given its current state, the site qualifies as a brownfield site.

The rezoning of the site would address the demand for housing and apartments within Drogheda. Its strategic position close to the town centre and public transportation network enhance its suitability for development. Furthermore, transforming this derelict site presents an excellent opportunity to erect a gateway building, serving as a prominent landmark along one of the towns primary access routes.

As seen on the map above, the area highlighted in yellow, 0.09ha of the site, is currently zoned A1 Existing Residential. It is requested the remainder of the site (circa 0.24ha) is rezoned to A1 Existing Residential.

Chief Executive Opinion on Issues raised:

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the new Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this submission at this stage.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.



Submission Ref. No:

LH-C144-DPIP-10

Submitted By:

Clr Shane Mc Guinness

List of Submission References submitted in relation to Greenways

The submission relates to the potential provision of a greenway between Soldier's Point in Dundalk and the Fane River which would leverage the natural beauty of the area and promote sustainable transportation and recreation. The submission sets out the following points for consideration by the Council:

Existing Infrastructure

The submission considers that all coastal Greenways should run along the coast, within 15-30 metres of the coast.

There would be fewer disputes with landowners if it was closer to the sea rather than encroaching on land holdings.

Soldier's Point to Fane River Greenway

The flood relief defences in the Dundalk Flood relief Scheme could be designed to complement the construction of the greenway and could potentially incorporate large sections along the village of Blackrock out to the Fane River.

The coastal greenway would offer recreational benefits, including providing facilities for walking, cycling and would be an alternate and sustainable facility and be an alternate mode of transport which would reduce reliance on fossil fuels, and which would promote a healthier lifestyle. There would be a benefit to local businesses and tourism by the creation of the coastal greenway could provide recreational facilities for persons looking to realise the hidden beauty of the coast and provide safe and restricted access to Special Areas of Conservation (SAC) and to Special Protection Area (SPA).

Chief Executive Opinion on Issues raised:

Project Ireland 2040 which comprises the National Planning Framework (NPF) 2040 and the National Development Plan sets out the overall national objectives.

Greenways are specifically mentioned in the NPF as a means of achieving enhanced amenities in rural areas which would promote activity-based tourism. There is a specific national policy objective which seeks to facilitate tourism development and develop national greenways.

Corridor 5 of the National Cycle Network is a planned coastal route connecting Dundalk to Wexford, integrating existing and future greenways along the coast. Key sections include the Dundalk to Drogheda Greenway (incorporating projects in Blackrock and Baltray) and the extension of the Boyne Greenway to Mornington. The development is part of the broader CycleConnects plan by the National Transport Authority (NTA) to create a comprehensive network across Ireland.

In County Louth it is the Council's Strategic objective to 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 e.g. Great Eastern Greenway, Louth Coastal Way. Dundalk to Sligo Greenway and the Boyne Greenways. Policy Objective MOV 32 of the 2021-2027 CDP seeks to "plan and develop a Louth Coastal Way along the east coast subject to appropriate environmental considerations".

The Council considers that Greenways are essential pieces of infrastructure and considers that Greenways provide a valuable recreational amenity that promotes an active and healthy lifestyle and are important tourism assets. The Council's own Corporate Plan includes Strategic Objectives that promote the delivery of Greenways



and recreational facilities policies that support Strategic Economic Development programmes like tourism.

The Dundalk Flood Defence Scheme is noted in the LCAP 2024 – 2029 and is a development objective of the current Louth County Development plan. Louth County Council will engage with OPW to reach agreement upon timeline for its construction. The design and implementation of flood risk defences for use as greenways is a matter for Louth County Council Operations Department and the OPW.

Chief Executive Recommendation:

To advance and deliver the Louth Coastal Way in consultation with the public and statutory agencies to ensure that the Strategic objectives of the National Planning framework can be delivered. The implementation of these strategic objectives will ensure that the creation of a Louth Coastal Way is developed as a valuable recreational amenity which promotes an active and healthy lifestyle and which are key important tourism assets in a sustainable environmental manner.

To include policy objectives supporting the progression of Flood Relief Schemes in the County including the Dundalk and Blackrock Flood Relief Scheme.

Submission Ref. No:

LH-C144-DPIP-11

Submitted By:

Tony Lennon on behalf of Dundalk Cycling Alliance

Summary of Main Issues Raised:

Cycling infrastructure in various settings require improvement.

In urban areas the construction and prioritisation of cycleways around Dundalk needs to be accelerated to encourage cycling and the Council should consider the introduction of a one-way system throughout Dundalk to facilitate the provision of cycle ways where space does not currently allow for same

In rural areas the greenways must be cycling friendly and are encouraged to be expedited both between Dundalk and Carlingford and Dundalk and Drogheda.

Improvements in cycling infrastructure should be prioritised to help the reduction in pollution.

Improvements in cycling infrastructure should be complemented in a wider sustainable transport provision including the introduction of affordable bus services.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the benefits of investment in active travel infrastructure in encouraging more people to walk and cycle, and as such, will be seeking to implement policies in the County Development Plan to support the modal shift from personal vehicles to active travel methods including cycling.

As part of the Council's Active Travel policies, it will support the progression of the Greenway network in the County and surrounding region.

The importance of integrating investment in active travel and public transport in maximising the return on investments is recognised.



Chief Executive Recommendation:

The Draft Plan will include policy objectives to encourage and support modal shift and explore options for improving the active travel infrastructure provision, especially in town centres.

Submission Ref. No:

LH-C144-DPIP-12

Submitted By:

Drogheda Port Company (DPC)

Summary of Main Issues Raised:

People & Place

The submission suggests the following strategic objective is included in the Development Plan to strengthen the urban structure of Drogheda:

- *Promote and facilitate the relocation of Drogheda Port operations from the Town Quays to Tom Roe's Point, to facilitate town centre regeneration at Drogheda Quays which would act as a stimulus for further redevelopment in the town centre and support the creation of an attractive, compact, and vibrant living space in the centre of the town.*

Employment & Economic Development

A masterplan for the DPC is currently being finalised, which will endorse the consolidation and expansion of the port. The current Development Plan provides policy support for Drogheda Port (Policy Objective SS9) and the submission suggests the following objectives are considered in the new Plan:

- *To support and protect the role of Drogheda Port as a Port of regional significance. Promote and enhance job stimulation and economic investment at Drogheda Port by supporting the consolidation and growth of Port operations at Tom Roe's Point, including capital dredging and river walls extensions, facilitating investment, upgrade and / or maintenance works to the Port, to ensure ongoing operability of Port activities, and the ability to attract new FDI opportunities to the region.*
- *Support Drogheda Port Company's ability to attract new shipping markets and FDI opportunities through the development of a new deepwater energy port at an east coast location (Bremore) which supports the strategic objectives of the Dublin Belfast Economic Corridor to be a significant economic driver for the region, bolstering growth and investment.*

Transport, Connectivity and Movement

The Port Access Northern Cross Route (PANCR) is a critical piece enabling infrastructure linking the Port to the M1. The road will remove port related traffic from the town centre, providing opportunity for public realm investment and giving greater priority to more sustainable modes of transport in the town centre. Both the RSES 2019-2031 and the LCDP 2021-2027 have policies to support its implementation. The PANCR will allow for the consolidation of DPC activities at Tom Roe's Point and the withdrawal from the Town Quays. This will significantly reduce the impact of port related traffic on the town centre and integrate economic land use and transport objectives. The following objective should be considered for inclusion in the new Plan:

- *Promote the delivery and completion of the Port Access Northern Cross Route eastwards to connect Drogheda Port lands to the M1 motorway infrastructure, achieving integration of economic land use and transport objectives, and facilitating the release and increase of employment generation lands at Tom Roes*



Point to include a port-centric employment zone.

Water, Energy & Communications

The current LCDP 2021-2027 states that *'the release of employment lands opposite Tom Roes Ferry terminal will require the delivery (or partial delivery) of the Port Access Northern Cross Route (PANCR) and water services infrastructure'*. Uisce Éireann has commenced a major infrastructure project to upgrade the wastewater network in North Drogheda which will increase wastewater capacity to support the development of over 5,000 new homes and will unlock housing and economic potential. The submission requests the following policy objective is considered the new Plan:

- *Seek investment in the necessary water infrastructure, utilities, and power supply to release and increase employment generation lands and economic potential at and around Tom Roes Point.*

Climate Action & Flooding

The Eastern CFRAM Study has identified flood risk areas in Drogheda and Baltray and sets out the measures and policies to be pursued to achieve the most cost effective and sustainable management of flood risk. RPS have undertaken a review of the modelled flood extents and identified where flood defences will be required along the River Boyne. The relocation of Drogheda Port Facilities from the town quays is necessary to future proof against climate change sea level rises. The submission requests the consideration of the following objective in the new Plan:

- *The relocation of the DPC Town Quays operations will facilitate the CFRAM findings and plans for flood protection in the town of Drogheda where flood walls are proposed for the existing port town quays.*
- *A further Capital dredging project for the port will facilitate the Drogheda and Baltray Flood Relief Scheme.*

Green Infrastructure

New port facilities can integrate green electrification (shore power for ships, electric cargo handling equipment), helping to reduce reliance on fossil fuels. Larger, newer facilities can accommodate bigger, more efficient ships which move more goods using less fuel per ton. New, well-designed port infrastructure can lower emissions, reduce pollution and improve resilience. The submission requests the consideration of the following policy objectives in the new Plan:

- *Support expansion of DPC port activities at and around Tom Roe's Point in tandem with delivery of PANCR, to reduce traffic congestion in the town centre and reduce secondary transport to storage locations.*
- *Support the connectivity and enhancement of the existing power grid at Tom Roes Point.*

Community, Recreation, Amenity & Social Inclusion

Drogheda has the potential to become a regular cruise location, bringing tourists to the heart of the Boyne. Specialist cruises could be accommodated at new facilities at Tom Roe's Point as part of the port expansion, with larger cruise liners accommodated at Mornington with the development of tender reception facilities. Additional riverside community and recreation facilities was a recommendation of the Drogheda Implementation Board. The submission requests the consideration of the following policy objectives in the new Plan:

- *To pursue recreation and leisure activity potential along the River Boyne, in tandem with Drogheda Port Company, following Soft Port values of community engagement, and cultural, environmental and social returns to Drogheda and the region.*
- *To support Drogheda and Drogheda Port as a cruise location.*



Chief Executive Opinion on Issues raised:

Drogheda Port is an important asset to the town and surrounding area due to the connectivity it provides to international markets and the employment it creates.

The Plan will include a narrative and associated policy objectives that support the ongoing investment and expansion of Drogheda Port, subject to compliance with the relevant planning and environmental criteria.

People and Place

The relocation of port operations from the Town Quays to Tom Roe's Point would be a major catalyst in facilitating the regeneration of Drogheda Town Centre and thus would be supported in the Draft Plan.

Employment and Economic Development

Policy support will also be included for the delivery and implementation of a Masterplan for Drogheda Port as this will provide a framework for the future growth and development of the Port in the coming years.

Transport, Connectivity and Movement

Policy Objective MOV 52 in the current LCDP 2021-2027 supports the progression of the PANCR and acknowledges it as a critical piece of enabling infrastructure that will have the dual benefit of releasing lands in north Drogheda for development, whilst also removing HGVs and port related traffic from the town centre. The Draft Plan will continue to support the implementation of the PANCR which will be a fundamental element of the Ports continued expansion and development of surrounding lands. Concurrently, a Local Transport Plan for the town is being developed which will inform further recommendations and policy objectives of enhancing the towns connectivity and supporting a shift to more sustainable modes of transport.

Water, Energy, and Communications

The importance of working with infrastructure providers including Uisce Éireann in ensuring necessary investment in infrastructure is made for towns such as Drogheda to fulfil their economic potential and continue to grow as envisioned in national and regional policy is recognised and therefore policy support in relation to same will be included in the Draft Plan.

Climate Action and Flooding

The Drogheda and Baltray Flood Relief Scheme is currently being progressed by the Council in partnership with the Office of Public Works. The Draft Plan will support the progression and delivery of this project. There will be a separate consultation on the Flood Relief Scheme itself as the design and options progress. As part of these consultations' consideration can be given to the impact of the relocation of the Port and dredging on the Flood Relief Scheme.

Green Infrastructure

The benefits of investment in port infrastructure in improving efficiencies and reducing emissions and assisting in the transition to a low carbon economy are recognised.

Community, Recreation Amenity and Open Space

The benefits of developing Drogheda as a cruise location to the local economy and the tourism sector in the area are recognised. Subject to this being developed in accordance with best environmental practice, policy support for same will be included in the Draft Plan.

The Louth Tourism Strategy is currently under review, which when completed will inform the narrative and policy objectives in relation to Tourism for the town and wider county.



Chief Executive Recommendation:

To include a narrative and associated policy objectives in the Draft Plan supporting the growth and development of Drogheda Port, the relocation of the Port to Tom Roe's Point, the implementation of the Masterplan for the Port, and the delivery of associated infrastructure to enable the Port to continue to expand.

Submission Ref. No:

LH-C144-DPIP-13

Submitted By:

John Woods

Summary of Main Issues Raised:

The submission sets out that the volume of traffic passing through Market Square in Carlingford has increased greatly over the last 20 years.

There was a proposal for the provision a roadway between Shilties and Nursing Home in Chapel Hill in a previous plan which would have reduced traffic accessing Market Square and provide a more pedestrian friendly village centre, as well as opening open other lands for development where it was sustainable. This roadway was removed during the review of the last plan (Louth County Development Plan 2021-2027) and the submission considers that it should be reinstated.

Chief Executive Opinion on Issues raised:

The provision of new roads is an operational issue, however the concerns regarding traffic in self-sustaining towns such as Carlingford are noted. While a new roadway was identified in the Louth County Development Plan 2015-2021 as Policy Objective CAR 16, it was not brought forward into the current plan (Louth County Development 2021-2027). This will be examined as part of the preparation of the Draft Plan

In relation traffic congestion, the Draft Plan will encourage the improvement of active, accessible and sustainable transport to promote a modal shift away from dependence on the private car towards more sustainable modes of transport.

In addition, a Part 8 'Living in Carlingford Visiting Carlingford Regeneration Scheme' (Planning Reference 23/345) was approved for Carlingford in June 2023, which will bring forward some of the suggested changes, as well as providing a generally more welcoming environment for non-car users in the town.

Chief Executive Recommendation:

To include policy objectives aimed at alleviating traffic congestion in small towns through a number of measures to encourage modal shift as well as improving road efficiency.

Provide policy objectives to support the implementation of the approved Part 8 Regeneration Scheme for Carlingford.

Submission Ref. No:

LH-C144-DPIP-15

Submitted By:

Aidan Geraghty on behalf of Patrick Mongey

Map showing land subject to Submission:

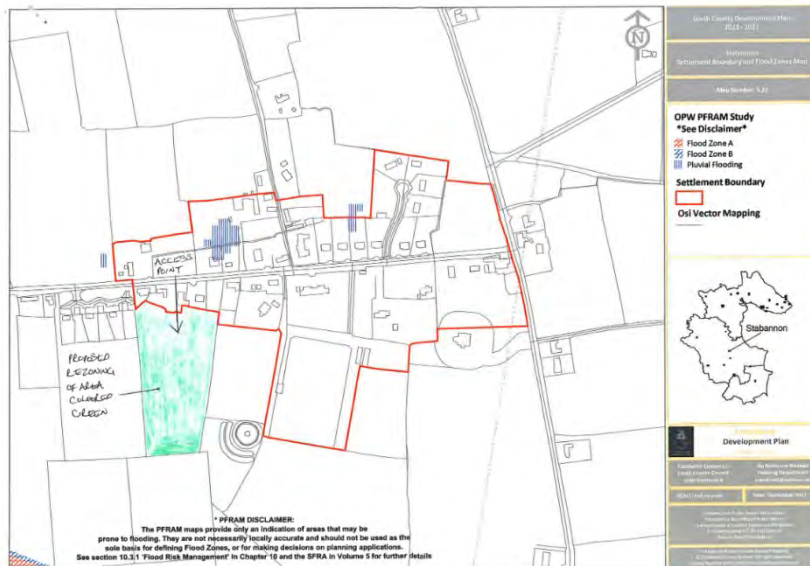


Figure 1: Map included as part of submission outlining the area subject of this submission.

Summary of Main Issues Raised:

The submission seeks to rezone the area of lands highlighted in green from rural to residential use.

Chief Executive Opinion on Issues raised:

The lands subject of this submission are currently outside of and immediately adjacent to the settlement boundary of Stabannon as shown in Figure 1 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) prevents zoning submissions from being considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this submission at this stage.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.



Submission Ref. No: LH-C144-DPIP-16
Submitted By: Alan Lynch

Summary of Main Issues Raised:

In 1896 the submitters' great grandfather Peter Lynch was elected Mayor of Drogheda, his term of office coincided with the implementation of the Drogheda Corporation Act 1896 which, among other things, extended the boundary of the town of Drogheda.

To mark the new boundary, 'marker stones' were erected at various extremities of the extension; these were noted on Ordnance Survey maps (OSI) at the time.

According to the OSI maps there were 13 stones erected, 9 have been located, it may be possible to find another by an excavation, however it is suspected that 3 are lost.

The ITM co-ordinates of the 9 remaining stones are provided:

1. Leonard's Cross at 'Y' junction of Mell Road and the old Slane Road (ITM 707147/775729),
2. North road opposite the junction of Cement Road and North Road (ITM 707966/776245),
3. Ballymakenny road at Forest Grange (ITM 709299/776478),
4. Termonfeckin road at Westcourt Estate (ITM 709988/776185),
5. Greenhills road at the junction with the new road that links to the Newfoundwell road (ITM 710508/775954),
6. Strand road near entrance to Premier Periclase (ITM 710589/775769),
7. Beamore road at the junction of Crosslanes Road and the Beamore (Naul) Road (ITM 709050/774113),
8. Donore road at No.3 St Finians's Park (ITM 707882/774468),
9. Rathmullen road at the junction with Marley's Lane (ITM 707217/775138),

The submission states that it is considered imperative that the remaining boundary stones are protected in law.

A description of the stones is provided: They are about 110cm tall, 46 cm wide and 18cm thick with a carved, pointed head. It is stated that most are in remarkable condition given their age, but some have slight damage while two are partially buried.

They are inscribed as follows: Borough, Boundary, Drogheda Corporation Act 1896, P Lynch J.P Major.

A photographic record has been provided in conjunction with the submission.

Chief Executive Opinion on Issues raised:

As per Part IV (Architectural Heritage), Section 51 of the Planning and Development Act 2000 (as amended) every development plan shall include a Record of Protected Structures. A review of the current Record of Protected Structures shall be conducted as part of the development plan process. Consideration will be given to including the boundary stones as part of this process. If they are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest to the County, they may be added to the Record of Protected Structures.

Chief Executive Recommendation:

Conduct a review of the Record of Protected Structures and ascertain if the boundary stones are of special



architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest to the County and update the Record of Protected Structures accordingly.

Submission Ref. No:

LH-C144-DPIP-17

Submitted By:

CLlr Shane McGuinness on behalf of Blackrock and Haggardstown Tidy Towns and VisitBlackrock.ie

Summary of Main Issues Raised:

The submission sets out that the Draft Plan considers the village of Blackrock as part of the greater Dundalk area rather than being a settlement in its own right and requests that the planned Urban Area Plan/Local Area Plan (Referred to in Chapter 2, CS10 of the Plan) afford due recognition to the separate identity of Blackrock and its specific development requirements in order to maximise and protect this identity.

The submission includes details of what a Blackrock-Haggardstown Development Plan would entail and provides a vision, together with a strategy and concerns listed under the following key themes:

Population and Housing

- Zoning should reflect the mix of housing types required: family homes, affordable units and smaller homes for older residents.
- Focus growth in serviced areas to prevent urban sprawl.
- Promote reuse of vacant/derelict buildings.
- Integrate new housing with community facilities and infrastructure services.

Community and Facilities

- Enhance sports, education, healthcare and recreation spaces.
- Develop shared community hubs social inclusion and cultural activities.
- Prioritise lifetime adaptability and universal design.
- Encourage volunteering and local events to strengthen community identity.
- Include for upgrading of Sandy Lane (improved footpaths and undergrounding of overhead networks).
- Provide a much-needed secondary school on designated land to west of Western Relief Road.

Transport and Connectivity

- Improve walking/cycling between Blackrock, Haggardstown and Dundalk.
- Promote safe routes to school and improved public transport services.
- Reduce car dependency and encourage active travel and local services.
- Examine potential for park and ride train station hub with 1,500 free car parking spaces in a designated area at Crumlin, Haggardstown.
- Ensure accessible transport for older people, children and those with mobility needs.
- Louth Coastal Way should include provision of a pedestrian/cycleway bridge over the mouth of the River Fane in vicinity to Fane View housing estate.

Natural and Built Heritage

- Protect coastline, wetlands and biodiversity and address coastal erosion and flood risk.
- Safeguard historic structures and encourage sensitive reuse.
- Preserve unique seaside character of Blackrock while supporting growth.



- Include the coastal road through the village as a designated Scenic Route and review the wording of VP46 and the placement of VP47.
- Recognise the special amenity value of Louth Bank Walls.
- Include proposal for planned flood defences including the restoration of the northern portion of the main beach which has gradually disappeared since the late 1950s.
- Policies in current CDP (MOV 49 & 50) includes a policy to map and list public rights of way – was this process started during the lifetime of the existing plan?
- Recognise the value of a range of trees.
- Have regard to the following reports prepared by Blackrock Tidy Towns in the preparation of the new plan (“Ecology & Biodiversity Enhancement Plan for Blackrock”, 2019 and “The Architecture of Main Street, Blackrock, 2008”).

Climate Action and Sustainability

- Promote renewable energy projects suited to community needs.
- Encourage energy-efficient homes and business and expand green infrastructure.
- Improve waste reduction and recycling initiatives.
- Pleased to see the Coastal Greenway from Dundalk to Blackrock incorporated into planned flood defences.

Economy and Tourism

- Support local services and business.
- Enhance the role of Blackrock as a seaside and leisure destination.
- Development cultural and maritime links to Carlingford and Dundalk Bay.
- Balance tourism growth with the needs of the residents to maintain the village character.
- Include Main Street, Blackrock as a Level 3 Retailing Centre in Chapter 5, Table 5.2 of the Plan otherwise the retail/commercial centre of the village is not recognised in the plan.

Infrastructure and Utilities

- Work with Uisce Éireann to improve wastewater capacity and services.
- Ensure water and wastewater infrastructure supports sustainable housing growth.
- Upgrade sea defences to reduce coastal flood risks.
- Upgrade Electrical and Broadband networks to support future population growth.
- Include a proposal the planned flood defences incorporate a restoration of northern portion of main beach.

Core Priorities

1. Deliver compact, sustainable housing growth.
2. Invest in community, recreation and health facilities.
3. Protect natural heritage and manage coastal flood risks.
4. Enhance walking, cycling and public transport connections.
5. Support the local economy and tourism in a balanced way.

The submission also sets out details of proposed community involvement associated with the preparation of a Development Plan for Blackrock-Haggardstown.

Chief Executive Opinion on Issues raised:

The submission makes reference to specific policy objectives and appendices within the Draft Plan however this document has not yet been prepared. The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan.



The submission sets out specific requests including land uses/proposals at a particular location (e.g. lands at Crumlin for a train station) however, in accordance with Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested zoning items raised within this submission at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

A response to relevant items within the submission will be provided under the relevant headings below:

Population and Housing

Land use zonings will be reviewed as part of Draft Plan and the growth strategy will be in line with national and regional policy which promotes sustainable, compact growth and will support the integration of new housing with community facilities and infrastructure services

The Chief Executive recognises the importance of reuse and regeneration of vacant/derelict buildings, and this will be promoted within the Draft Plan, and the Plan will provide support through the policy framework for the Government's Town Centre First Plan and associated initiatives and schemes for bringing vacant buildings back into use.

Community and Facilities

The importance of community, recreation and sports facilities in the creation of sustainable, walkable and socially inclusive neighbourhoods is acknowledged. A Social Infrastructure Audit was carried out as part of the review of the Dundalk Local Area Plan which will inform the new County Development Plan. The Draft Plan will support the promotion and enhancement of social and community facilities.

The Plan will promote lifetime adaptability and universal design within policy guidance however the control of this will be carried out through the Development Management process.

A Local Transport Plan was prepared for Dundalk as part of the preparation of the 2025-2031 Local Area Plan for the town which identified a number of road improvement measures including the reconfiguration and footpath improvements at Sandy Lane (Option ID 17). The design details and completion of such improvements is outside of the remit of the Draft Plan however the Plan will provide policy support for measures contained within the Local Transport Plan.

The Council will continue to actively engage with the Department of Education on requirements for school facilities and the Draft Plan will support the provision and growth of school facilities at appropriate locations. This will also be reflected in the land use zonings contained within the Draft Plan.

Transport and Connectivity

As outlined above, a Local Transport Plan was prepared for Dundalk and included a list of active travel measures identified for delivery in the coming years. The Draft Plan will support improvements to connectivity and the implementation of active travel measures and will promote a shift away from dependence on the private car towards more sustainable modes of transport including public transport, walking and cycling which are accessible to all.

The Draft Plan will include policy support for the implementation of the Safe Routes to Schools Programme.

As outlined at the beginning of this submission, the purpose of this stage of the Development Plan process is to identify Strategic matters which will inform the preparation of the Draft Plan. The potential zoning of lands at Crumlin, Haggardstown for a specific use cannot be considered at this stage however a submission can be made to the Draft Plan, when published, in relation to lands at Crumlin. It is recommended that the submitter include



a map to identify the specific location of the lands in question at this juncture. In relation to park and ride train station hub, it is worth noting that the Local Transport Plan includes proposed locations for five Mobility Hubs including Mobility Hub 3 (West) which is identified as a potential Park & Stride location to Dundalk Clarke Train station.

The Chief Executive recognises the importance of greenways as a valuable recreational amenity that promotes an active and healthy lifestyle as well as being an important tourism asset. The Draft Plan will support the Louth Coastal Way, which is a listed project within the Local Transport Plan for Dundalk (Table 4-1). The design details of this Coastal Way are outside of the remit of the Development Plan would be subject to a separate design process and associated public consultation through a Part 8 application.

Natural and Built Heritage

The Natural and Built heritage in the county contributes significantly to its attractiveness and its importance is recognised. The Draft Plan will continue to support the protection of the natural and built heritage through policy provision and guidance. All existing policy objectives will be reviewed and all mapping to identify features such as Scenic Routes, Viewpoints, Trees of Special Amenity Value etc will all be reviewed and updated as required within the Draft Plan.

Climate Action and Sustainability

The Draft Plan will support national targets in relation to electricity generation from renewable sources and will support renewable energy projects subject to compliance with the relevant planning and environmental criteria and considerations.

The Chief Executive recognises the importance of green infrastructure in the County and the Draft Plan will support the enhance of Green Infrastructure throughout the County. Such support will endeavour to ensure that existing and future residents have access to a variety of open spaces while also boosting biodiversity and assisting in the transition to a low carbon society.

The Draft Plan will support waste reduction and recycling however the management and achievement of this is outside the remit of the Development Plan.

The Draft Plan will support the support the Louth Coastal Way, which is a listed project within the Local Transport Plan for Dundalk (Table 4-1) and which will simultaneously act as a Coastal Defence Scheme.

Economy and Tourism

The strategic location of County Louth along the Dublin-Belfast Economic Corridor provides an opportunity for the continued growth and development of the economy and makes County Louth an attractive place for businesses to locate. The Draft Plan will continue to support the economic growth of the county in line with national and regional guidance.

A Retail Strategy will be prepared as part of the Draft Plan which will examine the existing and future potential retail offerings in the county. This Strategy will inform the policy objectives, and the Draft Plan will continue to support the growth of the retail sector within the county.

The coastal location of Louth provides a wide range of tourism opportunities. The Draft Plan will support for the tourism growth of the county in line with the Tourism Strategy, which was being prepared at the time of writing, while also respecting the character of the area.

Infrastructure and Utilities

The Council will continue to actively engage with relevant stakeholders such as Uisce Éireann to ensure that water and wastewater services are improved and adequate to accommodate the growth targets of the county.

A Strategic Flood Risk Assessment will be prepared as part of the Draft Plan and will contain policy objectives in



support of flood defences. The design of Flood Relief Schemes or restoration works is outside of the remit of the Development Plan.

The Draft Plan will support the upgrading of electrical broadband networks in the County through relevant policy objectives and guidance however the undertaking of such upgrades is outside the remit of the Development Plan.

Core Priorities

The Chief Executive recognises the importance of each of the core priorities set out within the submission and the Draft Plan will contain policy objectives and guidance in support of same.

Separate Settlement and Development Plan for Blackrock-Haggardstown

The designation of Dundalk as a Regional Growth Centre in national and regional policy is a recognition of the strategic importance of Dundalk as a location for employment growth and economic development.

The provision of a single strategy for the Dundalk and Blackrock area ensures that greater co-ordination in decision-making can be made in areas such as land use zoning, infrastructure and economic investment, and the provision of education and community facilities.

The Dundalk Local Area Plan, which was adopted on the 6th March 2025, included Blackrock-Haggardstown area within its settlement boundary and also recognises the contribution of the Blackrock area in facilitating residential and employment related development and the future potential of the town. The Draft Plan will be prepared having regard to the Dundalk LAP.

A review of the settlement hierarchy of the County will be undertaken as part of this review and will be included within the Draft Plan. Policy objectives will also be reviewed and will include details of the requirements for lower tier plans. Blackrock-Haggardstown will continue to be recognised as a key area of Dundalk.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the County in line with relevant national and regional policy and guidance.

To identify any lower tier settlement plans required in the County.

To support compact development and the sustainable growth of towns and villages in the county, including Blackrock-Haggardstown in line with national and regional policy guidance.

To examine and support the reuse of key sites in the county and the redevelopment and regeneration of vacant buildings and lands for residential and other suitable uses in line with the Town Centre First Strategy and the requirements for compact growth.

To continue to support the provision of community and recreation facilities through policy objectives and guidance.

The requirements for Universal Design and Lifetime Adaptability will be set out within the Development Management Standards in the Draft Plan.

To continue to engage proactively with the Department of Education to identify requirements for school facilities and to zone lands appropriate and provide policy objectives in support of their development.

To include policies that support improvements to connectivity and permeability and the implementation of active travel measures to provide increased opportunities for more sustainable forms of transport including walking and cycling.

To support the implementation of improvement measures and options/projects contained within the Local



Transport Plan.

To include policies that support the implementation of Safe Routes to School Infrastructure to make walking and cycling to school a safer option for students and families.

To support the protection and improvement of natural and built heritage within the County and to provide policy objectives in support of same.

To include policies supporting the implementation of the Climate Action Plan and the generation of electricity from renewable energy and to include within the Development Management in relation to same.

To include policies and guidance supporting the enhancement of Green Infrastructure throughout the County.

To provide policy objectives in support of waste reduction and recycling in line with the Climate Action Plan.

To support the economic growth and development of the county having regard to Louth's location along the Dublin-Belfast Economic Corridor and in line with national and regional policy.

To prepare a Retail Strategy as part of the Draft Plan and to review policy objectives to ensure continued support for the existing and future retail provision within the county.

To continue to support the tourism offerings and development in the county in line with the Tourism Strategy, which was being prepared at the time of writing.

To continue to engage with stakeholders such as Uisce Éireann and electricity providers to ensure infrastructure services including water and wastewater and electricity/broadband can cater for existing population and future growth.

To carry out a Strategic Flood Risk Assessment and to provide policy support in respect of flood risk and provision of flood defences.

Submission Ref. No:

LH-C144-DPIP-18

Submitted By:

Helen Byrne

Summary of Main Issues Raised:

The submission requests improved footpaths and Safe Routes to School Infrastructure around St. Fursey's National School, Haggardstown.

The submission sets out concerns in relation to the current condition of the pedestrian infrastructure in this area and that the lack of continuous footpaths, unsafe crossing points and poorly maintained footpaths make it difficult and dangerous for children/families to walk/cycle to school.

In certain areas near the school, children have to walk dangerously close to the road and there is no continuous cycle path to the school.

Improvements to these conditions would enhance student safety as well as encourage more families to choose active travel options which would in turn reduce traffic congestion around the school and support community health goals.

Chief Executive Opinion on Issues raised:

The concerns set out within the submission are recognised. A Local Transport Plan was prepared for Dundalk as part of the preparation of the 2025-2031 Local Area Plan for the town. This Transport Plan included a list of



active travel measures identified for delivery in the coming years. The upgrade of footpaths in the vicinity of St. Fursey's National School was not included in this list of projects. Nonetheless, the Draft Plan will include policy support for the implementation of Safe Routes to School Programme, should funding be received for works to improve pedestrian infrastructure in the area.

Furthermore, the Draft Plan will be consistent with the principles of sustainable transport as set out within the National Planning Framework and the Regional Spatial and Economic Strategy which promote a shift from dependence on the private car towards more sustainable modes of transport including public transport, walking and cycling.

Chief Executive Recommendation:

To include policies that support improvements to connectivity and permeability and the implementation of active travel measures to provide increased opportunities for more sustainable forms of transport including walking and cycling.

To include policies that support the implementation of Safe Routes to School Infrastructure to make walking and cycling to school a safer option for students and families.

Submission Ref. No:

LH-C144-DPIP-19

Submitted By:

Housing Infrastructure Services Company
(HISCo)

Summary of Main Issues Raised:

The submission sets out the background and business model of the company (HISCo). They provide a 'design-build-finance' service for housing estate infrastructure, on fully commercial terms, to developers and landowners and provide services including roads, footpaths, cycle lanes, water, wastewater facilities (mains and connections), amenity areas, utilities, public lighting etc. The company also provides solutions to associated off-site infrastructure deficits e.g. roundabouts, bridges, link roads, wastewater treatment plans etc.

The submission encourages close coordination between the local authority and HISCo during the review process to ensure alignment with the revised Housing Supply Targets in the National Planning Framework.

One of the main challenges HISCo encounter is being able to deliver infrastructure solutions but not being able to proceed due to inappropriate land zonings. The local authority will likely encounter infrastructure and servicing challenges when considering the zoning of additional residential zoned land and HISCo should be identified as a potential solution provider and they can facilitate discussion and understanding of how infrastructure deficits can be overcome to enable a substantial increase in housing supply.

Chief Executive Opinion on Issues raised:

As part of the preparation of the Draft Development Plan, a Settlement Capacity Audit will be carried out which will identify lands that are 'ready to go' and lands that are not currently sufficiently serviced to support new development but have the potential to be fully serviced within the life of the Plan. This tiered approach will inform the land use zonings proposed in the Draft Plan with the objective to avoiding zoning land that is unable to be brought forward for development due to deficiencies.



In the preparation of the Settlement Capacity Audit, the Council will continue to work in close conjunction with statutory service providers to identify any infrastructure constraints, potential solutions and timeframes for any required upgrades.

Engagement with private companies such as HISCo would be subject to a separate tendering and/or contract process and is outside of the remit of the preparation of the Development Plan.

Chief Executive Recommendation:

Engage with statutory service providers and infrastructure agencies to inform the Settlement Capacity Audit and inform land use zoning decisions as part of the plan preparation process.

Submission Ref. No:

LH-C144-DPIP-20

Submitted By:

Alan Lynch

Summary of Main Issues Raised:

The submission requests that the Drogheda boundary stones erected in 1883 by the then Mayor of the town, Thomas Carty be added to the Record of Protected Structures.

Details of 8no. Borough boundary stones are provided:

Coolagh Street bridge (ITM 709032742/ 1. 774326625),
Clinton's Lane (ITM 709132622/ 1. /774626928),
Dublin Road (ITM 709445493/ 774998205),
Marsh Road (ITM 710071895/ 775267419),
Strand Road (ITM 710272979/ 775625930) ,
Greenhills Road (ITM 710191619/ 775672894),
Cord Road (ITM 709592337/ 775513482);
Scarlet Crescent (ITM 709055232/ 775666279).

And 4no. Ward markers:

Millmount (at wall) (ITM 709065622/ 774799502)
Millmount (on grass) (ITM 708996891/ 774805323)
Barrack Lane (ITM 708918309/ 774860357)
King Street (ITM 709030758/ 775421539)

A photographic record has been provided in conjunction with the submission except for Ward markers for Barrack Lane and King Street.

Chief Executive Opinion on Issues raised:

As per Part IV (Architectural Heritage), Section 51 of the Planning and Development Act 2000 (as amended) every development plan shall include a Record of Protected Structures. A review of the current Record of Protected Structures shall be conducted as part of the development plan review process. Consideration will be given to including the boundary stones as part of this process. If they are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest to the County, they may be added to the Record of Protected Structures.



Chief Executive Recommendation:

Conduct a review of the Record of Protected Structures and ascertain if the boundary stones are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest to the County and update the Record of Protected Structures accordingly.

Submission Ref. No:

LH-C144-DPIP-21

Submitted By:

Declan Mallon

Summary of Main Issues Raised:

Core Strategy

Housing is a pressing issue. Local Authorities could counteract unaffordable trends by offering an antidote to market rental and purchase price. Where public funding is offered, a system of Community Land Trust contracts should be utilised.

The Community Land Trust is relevant to renovation of properties obtained under Compulsory Purchase Orders. Development is best focused where there is essential infrastructure, this improves sustainability.

People and Places

1. Grant aided renovated buildings should have rent caps and freezes appropriate to the size of their grant aid.
2. Counteract vacancy with more stringent measures. Legislation needs to be updated to avoid land hoarding, penalties could be part of the solution.
3. Time constraints should be put on owners of derelict buildings to rectify dereliction.
4. Temporary use of vacant buildings should be made compulsory, including rent free arrangements for community organisations where appropriate.
5. Dereliction is due to poor practice and bad legislation.
6. Public procurement of derelict properties should be increased; community involvement and public participation will help resolve matters.

Public realm projects have had a generally positive impact. Public should be involved in deciding how to optimise Millmount's two vacant buildings.

The balance between protecting rural environment and communities is a challenge.

Retailing and Town Centre First

1. Aside from working in Drogheda, town centre visits are socialising and retailing (to a lesser extent).
2. Vacancy to be addressed through national legislation on land hoarding practices and levies and, Community Land Trusts could be utilised. Greater public ownership is needed, e.g. Viennese experience.
3. Idea of multiple tenancies for the same building, with different day/ night times uses could assist in resolving some issues facing smaller businesses. Bringing family entertainment to the town centre such as using the former Dunnes as an ice rink is worth considering.
4. Apartments in town centres can work, rent controls can improve affordability. Independent access to the upper floors required.
5. Numerous events and cultural activities have been held in Drogheda these have had a positive impact however car parking should have been removed from West Street.
6. Retail parks are established; it is necessary to re-imagine town centres. Children and teenagers' views



should be considered.

Rural Development and Natural Resources

1. One off housing should be reserved for the people in the area. Vacancy and dereliction should be treated the same in urban and rural areas. Compulsory purchases orders should be used and stock sold to the local population.
2. Large scale housing is expensive to run.
3. Industries, fishing methods and agricultural practices should be altered to prevent any damage to the environment.
4. Appropriate developments should consider, location, environmental and social impacts.
5. Carlingford Lough is being polluted on both sides of the borders, this should be addressed urgently. Natural resources are important for economic, tourism and quality of life in Louth.
6. Better/ free public transports will support local communities.

Transport, Connectivity & Movement

1. Land use and public transport should be linked.
2. Drogheda is not safe to cycle. More cycling lanes required. Drogheda Cycling suggested that single lane car traffic should be introduced with pedestrian and cycle access widened. This should be offset by the re-greening of the carriageway. Removal of the M1 toll would divert traffic northward to the Northern Cross Route, relieving gridlock. Giving citizens priority would re- connect the north and south of the town.
3. Greenways are successful, increasing their number in urban areas will make for a more pleasant pedestrian and cycling experience.
4. Giving pedestrians priority including older people, people with disabilities and children, can make for a safer pedestrian experience.
5. A train station on the north side of Drogheda would alter traffic trends. Connecting bus routes from the main bus station is an alternative to car use. Make public travel cheaper than car travel. Cycling routes will make cycling easier around Drogheda.
6. There should be free public transport in rural areas. Old rail links should be re-opened.

Water, Energy & Communications

1. Authorities should address pollution of Carlingford Lough urgently.
2. Water is detrimentally impacted by growth, this is unsustainable. Redistribution of resources is a more logical approach.

Energy

1. Cost of energy impacts on growth. Negative impact on indigenous businesses. Positive opportunity to avail of green energy sources.
2. Energy investment is paramount.
3. Use of solar energy farms on roofs is imperative. Opportunities exist for free electricity, battery storage for domestic use and selling some back to the supplier. Example of Germany provided.
4. Solar and offshore wind farms are important. Public and private partnerships should ensure greater percentage goes back to public. Example of Nordic countries provided. Costs of individual households must come down.

Climate and Flooding

1. The main environmental issue is pollution and environmental damage. Agricultural practices can be damaging, example of Farm Zero C (near Bandon, Cork) is provided. Collaboration is required. Income scheme for farmers should be related to environmentally friendly practice; this also applies to marine practices. Impact of waste discharge into Carlingford lough, needs to be rectified urgently.



2. Growth should be sustainable. Protecting green areas is vital. Publications of Tony Conaghy and Drogheda Tidy Towns highlight biodiversity in the Ramparts part of Drogheda and at the old quarry site. A study of the Dale has recently been completed. Community participation is advocated.
3. Schools and public buildings should have energy solutions as exemplary practice.
4. Local public transport to become electric, leaf moulders in residential areas, pedestrianisation and safer cycle routes.
5. Much of what is being done at a grassroots level is excellent, this should continue.
6. Planning permission should not be given on flood plains, these are already a source of biodiversity, they can add to environmental tourism.

Green Infrastructure

1. Public buildings should operate green solutions.
2. Greening of town centres should be extended e.g. Tree planting along the dual carriage way and in the North Quay area.
3. Green areas should be protected e.g. Berlin.
4. National home insulation schemes should be introduced.
5. Safe cycle lanes should be created, along with additional bus routes and intensified services.

Natural & Built Heritage

1. Protect green areas, promote 'wild' as good and, encourage schools to use green sites for education.
2. Protect, grow and manage trees, woodlands and hedgerows. Enhance biodiversity through collaborative projects with local communities.
3. Built heritage adds to the aesthetic of the County, importance of built heritage and tourism. Don't damage the natural beauty of the Cooley area.
4. If development results in environmental damage, it is unwise. Natural heritage is sacrosanct. Built heritage needs appropriate legislation, stringent parameters and time limits on renovations. Donaghy's Mill, Drogheda is a case in point. Stricter controls and enforcement are required.
5. Legislation is required to address dereliction and vacancy. Natural heritage sites should be protected and preserved.
6. Better practices are required. The Council should lend expertise to local communities.
7. The Council might consider purchase of heritage buildings to protect which could be collaboratively restored, Barlow House is provided as an example.
8. Visual impact of solar panels may need to be reconsidered. ACAs throughout the County should be reviewed. Fines and confiscation maybe considered for some owners.

Tourism, Culture & Art

1. The best assets in Louth are its people, culture, natural and built heritage and historical monuments. It is essential that local populations have access to the latter. Cultural tourism is important. We should allow the character of the homogenous tourism product to shine.
2. Continue to make cultural/historical sites accessible to local populations. Lawrence's Gate is only occasionally accessible for short periods. OPW, the Council and locally based community organisations should work in collaboration to resolve this.
3. Natural trails and woodlands should be promoted. The Boyne should be utilised more frequently with barges, rowing and boat trips.
4. The walkways/greenways are already an asset and successful. Increase environmentalist tourism. Cultural development could be further enhanced with the input of various artists, artistic organisations and cultural actors. Collaboration is key.

Community, Recreation & Social Inclusion



1. Multiple usage of existing infrastructure is encouraged. Using publicly owned buildings for multiple community activities should save money. All recreational and community facilities should be made energy efficient.
2. Participative and collaborative projects and programmes enhance community ownership and inclusion.
3. There is an opportunity to create one large sports complex on the North side of Drogheda.
4. Drogheda United's ambitions for a new stadium should be absorbed into a wider collaborative development for sports organisations in the town. Smaller amenities also required throughout the town.

The following documents were submitted in conjunction with the submission: FuturePastPresent – Drogheda Lego Project Report, and Other Nations 2 - Biodiversity along the Boyne Greenway, Drogheda by Tony Conaghy.

Chief Executive Opinion on Issues raised:

Core Strategy

The shortfall in housing supply and associated pent up demand for housing in Louth and across the country is acknowledged. The new Plan will provide the policy support to ensure the housing requirements for the County can be met and there are sufficient lands available

People and Places

It is recognised that there is a need to address vacancy as a means of breathing new life into parts of our towns, villages and rural areas. The new Plan will continue to support the implementation of various measures to counteract vacancy and dereliction throughout the County.

Retailing and Town Centre

As part of the Government's Town Centre First Strategy several initiatives and schemes have been implemented to assist in regenerating town centres and bringing vacant buildings back into use. This includes the introduction of planning exemptions for the conversion of certain types of vacant commercial property into residential use and a Vacant Property Grant for the refurbishment of vacant properties into residential use. Legislation has also been introduced that would allow a Local Authority to introduce a temporary abatement of rates for vacant properties. Whilst the management and implementation of these initiatives is outside the remit of the County Development Plan, support will be provided for them in the policy framework of the Plan. The importance of events and cultural activities is recognised, and these will be supported in the new Plan.

Rural Development and Natural Resources

The new Plan will endeavour to facilitate people with a strong economic or social link to reside in their local rural area whilst balancing environmental concerns. Appropriate Assessment screening of all new developments will be conducted to ensure that they will not individually nor cumulatively impact upon European Sites. The protection of Louth's natural resources is of paramount importance, and this will continue to be reflected throughout the new Plan

Transport Connectivity and Movement

A key element informing the overall strategy of the new plan are the Local Transport Plans (LTP) for Dundalk and Drogheda. Drogheda's LTP, is currently being prepared. The outputs of the LTP will include both a walking strategy and a cycling strategy which will seek to create a comprehensive high-quality pedestrian and cycle network in the town, to initiate a permanent shift away from private car use. This will assist in greatly improving sustainable movement between residential areas and key destinations including the town centre, train station, schools, neighbourhood centres and employment areas. Louth County Council will continue to engage and work



closely with the NTA and TII in the preparation of the LTP to achieve the best outcomes.

Water Energy and Communications

Appropriate Assessment screening of all new developments will be conducted to ensure that they will not individually nor cumulatively impact upon European Sites such as Carlingford Lough SPA and Carlingford Shore SAC, this will be determined through the development management process. The new Plan will continue to contain Policy Objectives which protect and enhance Louth's natural heritage.

Energy

The Chief Executive supports the adoption of a net zero target by 2050 at EU level; the County Development Plan will continue to promote the development of renewal energy sources.

Climate and Flooding

The new County Development Plan will be accompanied by a Strategic Flood Risk Assessment (SFRA) which will be prepared in accordance with the requirements of the Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014). Consultants with the necessary technical expertise and experience will be appointed to undertake the SFRA for the new County Plan. The Draft Plan will seek to ensure that development in floodplains is avoided entirely or is 'water compatible,' as per the Flood Risk Guidelines (2009).

Green Infrastructure

The Draft Plan will promote the use of renewable energies of all forms and provide appropriate narrative and policy objectives for energy generators, ranging from residential scale to large scale energy producing schemes. The policy objectives contained therein will promote sustainable energy performance for existing and new buildings, including public buildings.

The narrative text and policy objectives in the new Plan will fully support the 'greening' of all towns including Drogheda and public buildings, where possible.

Natural and Built Heritage

Overall, the Draft Plan will incorporate a comprehensive suite of provisions that will seek to ensure that the existing natural and built heritage assets of the County including Drogheda, are adequately protected from inappropriate development. The built heritage policies in the Plan will also support the County's role as a tourist destination by encouraging the sensitive integration of heritage sites into tourism strategies and will promote the enhancement of cultural and historical assets, linking them with green and blue infrastructure to create a cohesive and attractive townscape for visitors. The protection of built heritage and the integration of sustainable tourism initiatives will contribute to both economic and cultural development of Drogheda, and the County as a whole. The Draft Plan will continue to promote greenways.

Tourism Culture and Art

There are policy objectives at national, regional, and county level to promote and enhance Louth's tourism offerings, these will be transposed into the new Plan. Promotion of outdoor recreation as well as Louth's rivers and coastline as assets, will form part of the new County Development Plan.

Community Recreation and Social Inclusion

The value of multi-uses buildings and campus is recognised and will continue to be promoted in the new County Development Plan. The new Plan will support the provision of new sports facilities where there is an identified need.

Chief Executive Recommendation:

- To support the delivery of social and affordable housing.
- To support the implementation of various measures to counteract vacancy and dereliction throughout the County.
- To provide policy objectives which support the provision of the Government’s Town Centre First Strategy.
- To enhance sustainable transportation throughout the County.
- To enhance and protect Louth’s natural and built resources.
- To promote the development of renewal energy sources and energy efficiency.
- To undertake a Strategic Flood Risk Assessment and promote climate action.
- To promote and enhance Louth’s tourism offerings.
- To support provision of new sports facilities where there is an identified need and encourage multi use.

Submission Ref. No:

LH-C144-DPIP-23

Submitted By:

Michael Byrne & Maureen Kennedy-Byrne

Map showing land subject to Submission:



Figure 1: Map included as part of submission.

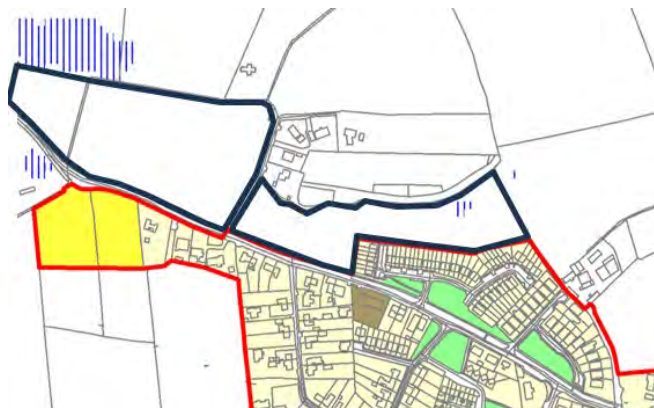


Figure 2: Extract from Clogherhead zoning map under the LCDP 2021-2027 to illustrate the location of the lands in the context of the settlement of Clogherhead (lands outlined in black for ease of reference).



Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 6ha of land on the northern side of Chapel Road/R166 from agriculture (currently zoned Rural Policy 1 & 2) to Residential.

The submission sets out a rationale for the rezoning request including: the location of the lands adjacent to Clogherhead village; that the lands are immediately serviceable; have direct access onto the Chapel Road that the majority of the lands are within the 50km speed limit of Clogherhead; and the surrounding pattern of development (residential).

Chief Executive Opinion on Issues raised:

The lands subject to this submission are situated outside of and immediately adjacent to the settlement boundary of Clogherhead as shown in Figure 2 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in black in Figure 2 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-24

Submitted By:

Eastern and Midlands Regional Assembly (EMRA)

Summary of Main Issues Raised:

1.0 Overall Context

The Eastern and Midlands Regional Assembly (EMRA) is primarily responsible for driving regional development through the formulation and implementation of the Regional Spatial and Economic Strategy (RSES), coordinating City and County Development Plans and Local Economic and Community Plans (LECPs), managing EU Operational Programs, participating in EU projects, and implementing national economic policy. It also engages in consultations on other strategic plans.

The Planning and Development Act 2024, which commenced in October 2025, has replaced previous legislation and introduces new provisions for Development Plans to be phased in. EMRA has prepared this submission to



guide the Planning Authority in drafting the County Development Plan (CDP), outlining key considerations and recommendations to ensure the CDP is materially consistent with the RSES.

2.0 Regional Spatial and Economic Strategy (RSES)

The RSES for the Eastern and Midland Region was made by the Members in June 2019, and it is a strategic plan and investment framework to shape future growth throughout the Region. The vision is to create a sustainable and competitive region that supports the health and wellbeing of people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. This is supported by sixteen Regional Strategic Outcomes (RSOs) that are aligned with National Strategic Outcomes of the National Planning Framework (NPF) and framed around the three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

The RSES aims to implement the NPF and National Marine Planning Framework (NMPF), while aligning with the National Development Plan (NDP) and Project Ireland 2040 by linking development with essential infrastructure and services. As a key tier in Ireland's planning system, the RSES is critical for delivering Project Ireland 2040 and provides the framework for local authorities to prepare City and County Development Plans (CDPs) and Local Economic and Community Plans (LECPs) in alignment with national, regional, and local objectives.

3.0 Legislative Context

In line with the provisions of Section 11 (1), the Planning Authority shall ensure, when making the CDP, that it is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region.

The Council should be aware that Section 54 (8) of Chapter 5 of the Planning and Development Act 2024, as amended, requires the Regional Assembly to prepare and submit to the planning authority a report which shall set out—

- (i) the matters which, in the opinion of the regional assembly, should be considered by the planning authority in the preparation of the draft development plan, and
- (ii) recommendations on the matters that are required to be included in the draft development plan to ensure that the draft development plan is materially consistent with the regional spatial and economic strategy of the region concerned.

Under Section 30 of the Planning and Development Act 2024, the Regional Assembly must begin a review of the Regional Spatial and Economic Strategy (RSES) within six months of Section 21(6) coming into effect on 2 October 2025. Following the review, a new RSES must be prepared in accordance with Section 32. The updated RSES for the Eastern and Midland Region will comply with new legislative requirements and align with Project Ireland 2040, including the NPF 2025, NMPF 2021, NDP 2025, and other national policies.

4.0 Submission

4.1 Ensuring Consistency with the RSES - Key Areas

In addition to ensuring the Plan in its entirety is consistent with the RSES, the following are key areas that the Assembly would like to bring attention to, in order to inform the preparation of the Louth CDP 2027-2033.

Furthermore, the Council should be aware of Section 29 of the PADA 2024, as amended, which sets out the matters for which the RSES is required to make provision and with which the CDP will be required to be materially consistent.

4.1.1 The Vision

In determining the overall vision of the new Louth CDP, it is recommended that the Council consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES. The RSOs are aligned to the National Strategic Outcomes (NSOs) of the NPF, and it should be noted that the ability to demonstrate delivery of these



may potentially be linked to future funding sources.

4.1.2 Ensuring Spatial Alignment

The RSES for the Eastern and Midland Region sets out a spatial and economic framework to guide sustainable growth, focusing on Dublin as a smart, climate-resilient global city region, designating Athlone, Drogheda, and Dundalk as Regional Growth Centres, and supporting a network of Key Towns and rural settlements. It also emphasises strategic economic corridors, notably the Dublin-Belfast Economic Corridor and the Eastern Corridor to Rosslare Europort, as key growth enablers. The revised NPF 2025 incorporates updated government priorities such as climate transition, digitalisation, and regional development, reinforcing this settlement hierarchy. The Regional Assembly recommends that the new Louth County Development Plan align fully with this hierarchy to ensure effective public investment and achieve Project Ireland 2040 objectives.

4.1.3 Growth Strategy of the RSES

It should be noted that Growth Enablers have been specified in Section 3.2 of the RSES to facilitate growth across the Region. Growth Enablers are underpinned by the spatial mapping of Functional Urban Areas (FUAs) within the Region. The FUAs for the Eastern and Midland Region are the Dublin Metropolitan Area, the Core Region and the Gateway Region.

4.1.4 Sustainable Compact Growth

The RSES provides the spatial framework for population growth and economic development, guiding new County Development Plans (CDPs). A key priority is compact growth, delivering new homes within existing settlement footprints near services and infrastructure, aligning with National Strategic Outcome (NSO 1) and Regional Strategic Outcome (RSO 2). In this regard the Council's attention is brought to RPO 3.7 which outlines the need to ensure sustainable growth and the future CDP should ensure consistency with RPOs 3.2 and 3.3.

RPO 3.2 requires that local authorities set out measures to achieve compact development targets of at least 30% of new homes within the existing built-up footprint of settlements (in line with NPO 9 of the NPF). To support achievement of these targets, the RSES sets out Guiding Principles for infill and brownfield development in Chapter 3 – Growth Strategy, which includes the creation of a brownfield database at the local level and the inclusion of focused active land management measures in the CDP. RPO 3.3 also determines that regeneration lands are identified in Core Strategies and that specific objectives are set out to develop these lands. The Assembly welcomes reference to the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) in the Issues Paper which set national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

To support evidence-based CDPs, the Regional Development Monitor (RDM) offers socio-economic and environmental data, mapping, and visualisation tools via GeoHive.

4.1.5 Settlement Strategy of the RSES

In formulating the Core Strategy of the CDP, the attention of the Council is brought to Chapter 4 of the RSES, including Settlement Strategy RPOs 4.1 and 4.2 which require that the hierarchy of settlements.

The RSES defines Drogheda as a Regional Growth Centre in the Core Region and Dundalk as a Regional Growth Centre in the Gateway Region. Thus, the Settlement Hierarchy of the CDP is required to reflect this.

Section 4.5 of the RSES sets out the strategic development framework for Drogheda, supported by RPOs 4.11–4.18, addressing its role as an important self-sustaining centre, that acts as an economic driver for the Region, capitalising on its strategic location and high-quality connections to Dublin while also servicing and supporting a wider local economy. Similarly, Section 4.5, establishes the framework for Dundalk, supported by RPOs 4.19–4.25, with its position on the Dublin-Belfast rail corridor, M1 and proximity to Dublin and Belfast metropolitan



centres, its links to Newry and opportunity to capitalise on its location within the Dublin-Belfast Economic Corridor (DBEC).

Section 4.5 of the RSES sets out the framework for the Joint UAP. It should be noted that the Planning and Development Act 2024 makes provision for the making of Coordinated Area Plans where a settlement or part of a settlement straddles the functional area of two or more planning authorities, replacing the previous regime (under the Planning and Development Act, 2000) that provided for Joint Urban Area Plans in such circumstances.

Should the Council decide to revisit the categorisation and tiering of lower-tier settlements in developing the County's Settlement Hierarchy, the Assembly directs it to Section 3.1 and Appendix A of the RSES which provides detail on the Asset-Based Approach to spatial development.

The Assembly also refers the Council to the 15-Minute City Implementation Pathway report which identifies public policy support, ongoing actions, good practice examples and funding opportunities for '15-Minute City' and '10 Minute Town' concepts.

4.1.6 Dublin-Belfast Economic Corridor (DBEC)

The National Planning Framework (NPF) emphasises the strategic role of the Drogheda–Dundalk–Newry network within the Dublin–Belfast Economic Corridor (DBEC), which links the island's two largest cities and major towns, forming its largest economic agglomeration with a population of about 2 million. This corridor benefits from high-capacity road and rail links, airports handling 39.5 million passengers annually, and seaports, with further growth projected.

The County Development Plan (CDP) should support DBEC and the East Border Region Councils' Charter, aiming to create a smart, competitive, sustainable, and inclusive cross-border region, aligning with NPO 57 to enhance DBEC's economic potential and international visibility. NPO 15 calls for strengthening Drogheda and Dundalk's urban structure to achieve critical mass through compact, sequential, and sustainable development, supported by regeneration funding programs.

The NPF also prioritises: Protecting and improving key transport corridors from sprawl; Exploring rail service improvements under PEACEPLUS and the All-Island Strategic Rail Review; Safeguarding distinctive landscapes, rural activities, and green spaces between settlements; Advancing the Narrow Water Bridge project to boost tourism, connectivity, and cross-border active travel (greenways, trails, parks).

The NPF prioritises the Dublin–Belfast Economic Corridor (DBEC) as a key driver of regional development, linking major urban centres with strong transport and international connectivity. The CDP should support compact, sustainable growth in Drogheda and Dundalk, protect strategic transport corridors, and advance cross-border collaboration through research partnerships, education expansion, apprenticeship and exchange programs, and enterprise initiatives such as innovation and agri-food development. Coordinated branding and data collection for DBEC should be emphasised. The CDP must also reflect the All-Island Strategic Rail Review (2024), which identifies the Dublin–Belfast rail corridor as a critical decarbonised transport spine, ensuring land use and infrastructure policy leverages enhanced connectivity alongside projects like the Narrow Water Bridge to boost tourism and active travel.

4.2 Issues Paper

This section broadly follows the content of the Pre-Draft Strategic Issues Paper.

4.2.1 Vision

The Assembly notes the current Vision for the County which is welcomed. Noting the ambitious Vision set out in the Council's Climate Action Plan, namely that '*Louth to be a new zero County by 2050*', it is recommended that this is integrated into the new CDP Vision.



4.2.2 Core Strategy

The Core Strategy has a central focus on residential development, and ensuring there is a sufficient supply of zoned, serviced lands to meet housing needs over the lifetime of the Plan.

The Department of Housing, Local Government and Heritage (DHLGH) published Guidelines in 2025 (under Section 28 of the Planning and Development Act 2000, as amended) which set housing growth targets and provides guidance to local authorities to ensure enough residential lands are zoned to meet the needs of the settlement.

The Guidelines request Planning Authorities to consider an additional scope of 50% ‘additional provision’ over the baseline requirement. The justification for the overprovision must conform with 2022 Development Plan Guidelines (Section 4.4.3). Planning Authorities must assess their current CDP, its Core Strategy and settlement strategy and identify further development needs with updated zoning objectives where necessary, to reflect the housing growth requirements. Planning Authorities are also required to prioritise the preparation of Settlement Capacity Audits (SCAs) to identify zoned serviced/serviceable lands and to highlight infrastructural requirements.

The Core Strategy options listed in the Issues Paper are noted; and it is recommended that the Planning Authority focuses on a mixture of:

Option 02: Review existing population and housing growth in each settlement over 2016-2022 Census periods, determine growth rates and use these as a baseline for projected growth from 2027-2033; and

Option 03: Increasing the allocation of population and housing growth to Regional Growth Centres, Self-Sustaining Towns, and Small Towns and Villages in the current settlement strategy.

The RSES Settlement Strategy supports the Regional Growth Centres of Drogheda and Dundalk to reach a target population in the Region of 50,000 by 2031 to reach city scale, by focusing on regeneration of the town centre including infill and brownfield site, and compact planned urban growth and co-ordinated growth of the towns

4.2.3 People and Place

Section 9.3 of the RSES deals specifically with ‘Housing and Regeneration’, whereas Section 4.8 of the RSES deals with housing in rural places. The Planning Authority is also directed towards Section 9.4 focusing on healthy placemaking which is one of the three key principles of the RSES. These sections and related Guiding Principles will provide further direction to assist in formulating related policy for the CDP.

A framework for the development of the urban centres in the County and the distribution of future growth will be an essential part of the CDP. Points outlined above, under the heading ‘Ensuring Consistency with the RSES – Key Areas’ should be considered in this regard. The role of Drogheda and Dundalk as Regional Growth Centres at the top of the Settlement Hierarchy is recognised and ensures that they will drive regional growth, as per RSO 1 of the RSES.

The NPF and Section 28 Guidelines assign housing growth targets to Planning Authorities and require a tailored approach to balanced development. This involves applying Compact Growth and Town Centre First policies, supported by NDP investment and regeneration funds (RRDF and URDF). NPO 20 emphasises urban infill and brownfield development. NPO 15 calls for encouraging population growth with employment, reversing stagnation in smaller towns through new roles and infrastructure, addressing legacy issues in commuter settlements with improved services and sustainable transport, and maintaining balanced growth in self-contained settlements. Authorities must also prepare or update a Housing Need and Demand Assessment (HNDA), as required by NPO 47, using DHLGH guidance and tools to estimate future housing needs by tenure type. The RSES growth enablers and RPO 9.5 commit regional support for HNDA preparation.

4.2.4 Employment and Economic Development



The NPF prioritises economic resilience for the region, emphasising seamless cross-border movement, improved digital and physical infrastructure, and enhanced connectivity to leverage employment and sustainable population growth, particularly in county towns. This would position the area strategically between Dublin, Belfast, and Derry. Economic Opportunity is a core principle of the RSES, supported by RSOs 12–16, with specific RPOs for Drogheda (4.11–4.18) and Dundalk (4.19–4.25), including the need for an Urban Area Plan for Drogheda. Chapter 6 of the RSES addresses economy and employment, highlighting DBEC’s role (Section 6.4) and requiring support for large population and employment centres along the corridor (RPO 6.3). Town centre renewal (RPOs 6.12–6.14) is also emphasised to tackle vacancy and regeneration. NPO 19 directs Planning Authorities to identify and quantify strategic employment locations in both urban and rural areas.

Section 6.6 of the RSES emphasises drivers for resilient, sustainable, and inclusive economic growth, including opportunities for FDI, clustering, smart specialisation, and a smart city program for Drogheda and Dundalk (RPO 6.30). These initiatives should align with Regional Enterprise Plans, national innovation policy, and focus on placemaking and urban regeneration to attract investment and high-value employment. The Planning Authority is encouraged to support digital transition, collaborate with IoTs/TUs, and strengthen sectors such as technology, life sciences, services, and tourism. RPOs 6.4–6.8 address rural economy priorities, while Section 6.5 highlights sectors like retail, tourism, marine, low-carbon economy, and agriculture for policy development. Guidance from NPF Section 4.4 and OPR Practice Note PN04 should inform agile CDP policies for employment lands to accommodate enterprise needs.

4.2.5 Retailing and Town Centre First

The CDP should promote Town Centre First principles by encouraging people to live in town centres through initiatives like vacant homes, shopfront, conservation, and energy efficiency grants, as well as schemes such as Town and Village Renewal, URDF, and RRDF. Collaboration with other agencies is essential to deliver healthy placemaking and vibrant town centres. Renewal efforts should prioritise retail and community services while diversifying uses to include healthcare, cafés, restaurants, entertainment venues, gyms, alternative tourism offerings, short-term tourist accommodation, and public art. These measures align with RSES (RPOs 6.12–6.14) and aim to regenerate town centres and reduce vacancy.

In addition to retail, town centre uses should remain the focus in the next CDP with positive community services and entertainment offerings such as health care facilities, cafés and restaurants, theatres/ comedy clubs, gyms/ climbing walls, alternative tourism offerings, some short-term tourist-let accommodation and public art murals are appropriate to the Town Centre.

The night-time economy requires dedicated actions with the support of: Tourism agencies, The Council, An Garda Síochána and local communities.

The RSES (Table 6.1, Section 6.5) sets out the Retail Hierarchy for the Region with:

- Level 2 Major Town Centres & County (Principal) Town Centres identified as Drogheda and Dundalk.
- Level 3 Town and/or District Centres & Sub-County Town Centres (Key Service Centres) identified as Ardee, Drogheda District Centre (Matthews’ Lane) and Dundalk District Centres (Dublin Road and Ard Easmuinn).
- Level 4 centres include Neighbourhood Centres, Local Centres-Small Towns and Villages in Co. Louth.
- Level 5 are Corner Shops/Small Villages.

The new CDP Retail Strategy should align with the Retail Hierarchy in the RSES and associated RPOs 6.10-6.11.

4.2.6 Rural Development and Natural Resources

The Assembly welcomes the inclusion of the OECD Principles on Rural Policy as guiding principles for the new CDP.

Section 6.5 of the RSES highlights the importance of the value of agricultural land, particularly in areas that are experiencing strong urbanisation pressures. The agri-food sector remains of significant importance and requires



protection, with a focus on sustainability, food security and health. It is highly exposed to the effects of climate change and contributor to national emissions. RPO 6.24 is relevant in this regard.

RPOs for Rural Places are contained under Section 4.8 of the RSES and are relevant for formulating CDP policy. The Sustainable Rural Housing Guidelines (2005) and Circular PL 2/2017 remain relevant to the formulation of policy. There is a need for promotion of new economic opportunities arising from digital connectivity and indigenous innovation and enterprise as well as more traditional natural and resource assets (e.g. food energy, tourism), underpinned by a quality of life offering. The Planning Authority is also directed to RPOs 6.4-6.8 which support the enhancement and diversification of rural economic development.

The Council's attention is drawn to the Interreg Europe ORIGINN project. Areas of thematic focus are digitalisation, green economy, industrial sustainability, social innovation, and soft innovation. Insights drawn from the project will inform the review of the RSES, to ensure that policies for innovative social and economic transformation in rural areas reflect the needs and the potential of the Region.

4.2.7 Transport, Connectivity and Movement

The RSES supports a feasibility study for high-speed rail between Dublin and Belfast and enhanced rail services. Public transport and the offering of alternatives to the private car are crucial to supporting sustainable transport and active travel objectives in a new CDP with the need to reduce the reliance on and negative impacts of car usage.

The NPF places an emphasis on delivering large-scale Transport Orientated Development (TOD) at brownfield and greenfield sites close to major public transport hubs in the cities and towns. It promotes the 'Avoid-Shift-Improve' model of transportation infrastructure development, emphasises the need for enhanced permeability in our settlements and the promotion of active travel in reducing transport emissions. This is in tandem with the deployment of an EV Charging Network Plan and advanced availability of shared sustainable travel modes. It also signals the need for freight transport to transition to zero emissions.

The Assembly recommends that the CDP supports relevant recommendations of the All-Island Strategic Rail Review (2024) and the application of TOD principles at existing and potential rail nodes.

The Council's attention is drawn to the Sustainable Mobility Academy which is a repository of knowledge, showcasing case studies, project outcomes, and ongoing advancements across all local authorities in the area of active travel and sustainable mobility.

The CDP should support the creation of walkable neighbourhoods and connected street networks that enable direct, safe, and convenient access to schools, workplaces, local services, and transport nodes. The Assembly recommends inclusion of objectives to:

- Prioritise pedestrian and cycle infrastructure consistent with the National Sustainable Mobility Policy (2022).
- Conduct permeability audits for major development areas ensuring walkable neighbourhoods, connected street networks.
- Integrate active travel infrastructure and facilities with public transport; and
- Incorporate road safety measures in active travel design, in line with the National Road Safety Strategy 2021–2030.

Guiding Principles (Section 8.3) and related RPOs of the RSES, provides the basis for the integration of land use and transport planning for urban and rural areas. Further to this, RPO 8.6 of the RSES requires the preparation of Local Transport Plans (LPTs), in conjunction with the NTA, for Drogheda and Dundalk.

The strategic function of the DBEC as a driver for regional economic development within the Region is promoted in the RSES. The Planning Authority is directed to RPOs 8.11 and 8.12.



The NPF (Section 7.3) also references Drogheda Port and the role of regional ports in supporting regional employment and services, commercial freight, marine sector (fisheries, marine renewable energy, tourism).

The Louth CDP 2027–2033 should align not only with the RSES but also with wider national and all-island transport and mobility frameworks, including the All-Island Strategic Rail Review (2024), the National Sustainable Mobility Policy (2022), and the National Road Safety Strategy (2021–2030).

4.2.8 Water, Energy and Communications

Water

Uisce Éireann's 10-Year Water and Wastewater Capacity Registers (2025) identify infrastructure capacity for 2034 population targets, highlighting 18 settlements in Louth, with 3 rated 'red', 3 'amber', and the rest 'green', indicating where investment is needed. The NPF prioritises development in areas with existing or planned infrastructure, demand management, and maximising water services through nature-based solutions and SuDS, alongside new NPOs on integrated wastewater and drainage management and biodiversity protection. It also emphasises green and blue infrastructure for urban liveability. Section 10.2 of the RSES provides relevant RPOs. Additionally, a National Maritime Area Plan and forthcoming Irish Coastal Change Strategy will guide coastal management, with new NPOs addressing sea-level rise, coastal erosion, and adaptation measures for inclusion in the CDP.

Energy

NPF (Chapter 9) seeks to develop renewable energy (RE) in the Region, at an accelerated rate, via wind, solar, biomass and wave energy. It has a greater emphasis on climate action and a transition to a carbon neutral and resilient society. There is a commitment to achieving climate neutrality no later than 2050 with a 51% reduction in GHG emissions by 2030 and meeting the legally binding objectives in Climate Action and Low Carbon Development (Amendment) Act 2021. There is a target of at least 5GW of installed offshore wind capacity by 2030, and the longer-term ambition for over 37GW of offshore renewable energy (ORE) to be delivered before 2050.

The Regional Assemblies must identify allocations for each local authority, based on the best available scientific evidence and in accordance with legislative requirements, to meet the overall national targets and over commitments.

Communications

The RSES recognises that the sustainable growth of the Region requires the provision of services and infrastructure in a plan-led manner to ensure that there is adequate capacity to support future development.

In order to further assist the Council in developing its policy framework, the Assembly draws attention to its submission to the Public Consultation on Accelerating Infrastructure Delivery by the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation which identifies barriers to infrastructure delivery in the context of the RSES and proposes a range of solutions to address those barriers. By drawing on EMRA's recommendations, particularly those on embedding spatial alignment in infrastructure decision-making and adopting a multi-criteria, spatially aware prioritisation framework, the Council can support infrastructure provision that underpins sustainable development, enhances connectivity, supports enterprise activation, and complies with environmental and climate obligations.

The CDP should identify infrastructure priorities that align with higher-level frameworks, supporting compact settlement patterns, decarbonisation and integrated investment sequencing.

4.2.9 Climate Action and Flooding

Climate Action



The Assembly remains committed to supporting the development of a user-friendly tool for quantifying and forecasting the relative GHG impacts of alternative spatial planning policies in Ireland. The Council is further directed to the updated text in NSO 8 of the NPF which takes account of the Climate Action and Low Carbon Development (Amendment) Act which was enacted in 2021 and the National Climate Action Plan 2025 (reviewed annually).

The Assembly further recommends that the CDP Strategic Environmental Assessment (SEA) includes a robust climate assessment, as required under the SEA Directive and Planning and Development Regulations. For example, the SEA should evaluate the climate implications of different spatial and transport scenarios and demonstrate how the preferred approach supports emission reduction and resilience. In this regard, the Assembly also recommends utilising the National Transport Authority's modelling capacity to assess the likely transport and climate impacts of alternative plan options, supporting evidence-based decision-making and alignment with the RSES Climate Action Strategy.

Flooding

As the CDP is being prepared, focused environmental assessments will be required, including SFRA. It is recommended that the Council consider the need to identify risks and ensure the resilience of critical infrastructure, as set out in RPO 7.43 of the RSES. Specific flooding RPOs (7.12-15) are set out in Section 7.4 of the RSES, and it is supported by a Regional Flood Risk Appraisal. It is also recommended that the Council utilises OPW resources available from www.floodinfo.ie in relation to Flood Risk Management Maps, Flood Relief Schemes, Flood Maps, flood mitigation/coastal protection works, etc., follows the requirements set out in the Planning System and Flood Risk Management - Guidelines for Planning Authorities (2009) and note the provisions of the National Adaptation Framework 2024.

4.2.10 Green Infrastructure

Section 7.7 of the RSES relates to Green Infrastructure (GI) and Chapter 10 Infrastructure sets out Guiding Principles for the incorporation of SuDS. GI should be recognised and preserved where possible as natural defences against flood risk in both urban and rural areas. It maintains ecosystem services where habitats are connected and relates to terrestrial and aquatic habitats. It has a role in carbon sequestration and is a key component of climate resilience.

GI has significant health benefits, promotes wellbeing, recreational and tourism benefit and is an integral part of placemaking. The RSES supports the preparation of GI strategies at local authority level with Guiding Principles and associated RPOs 7.22-7.26 which should be incorporated into the future CDP. It is recommended that habitat mapping is created to inform zoning within settlements.

4.2.11 Natural and Built Heritage

The new CDP should support RPOs 7.16 to 7.20 of the RSES. EMRA has developed a range of resources to support the implementation of RSES objectives for ecosystem services and green infrastructure. These resources include a green infrastructure and ecosystem services mapping methodology, policy briefs which include 'how to' recommendations, good practice handbooks, and infographics. These may be of assistance to the local authority in developing the future CDP.

The RSES emphasises that good heritage management should be incorporated into spatial planning to promote the benefits of heritage-led urban regeneration in historic towns, for example through the protection of historic urban fabric, the reuse of historic buildings and the enhancement of places of special cultural or natural interest. It should also be recognised that the built and natural heritage are key resources that will play a positive role in driving economic development in terms of tourism potential. Section 9.7 of the RSES and its related RPOs provides guidance in this regard which should assist in developing plan policy in this area.

Section 7.8 of the RSES covers landscape considerations including areas such as Carlingford Lough in Co. Louth



with Guiding Principles and RPOs 7.27-7.28 of the RSES.

4.2.12 Tourism, Culture and Art

The RSES list Growth Enablers which include the promotion of the Region for tourism, leisure and recreational activities including development of an integrated greenway network while ensuring that high value assets and amenities are protected and enhanced. Within the Gateway Region, it also promotes the Region as a key destination for tourism, leisure and recreation activities and supports the development of an integrated network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced.

The NPF states that tourism development and promotional branding must ensure that areas such as ‘Ireland’s Ancient East’ and ‘Ireland’s Hidden Heartlands’ are developed and promoted in such a way as to play their full part in tapping the economic potential of regional and rural areas in the Region. The CDP should be informed by the Boyne Valley Tourism Strategy & Action Plan 2024-2030 which sets out its objectives, projects and actions for Co. Louth and Co. Meath, which sets out an ambitious target to become one of the leading experiential destinations in the world.

The RSES highlights the Boyne Valley Food Hub associated with the Boyne Valley, synonymous with food production and trade as far back as 10,000 years ago.

The aim is to accelerate the growth of the agri-food sector through collaboration, innovation, and clustering to support scalable, sustainable and profitable food businesses in Counties Meath, Louth, Kildare and Wicklow. It packages several industry deliverables including food units for startup and scaling food business, a community kitchen, a Food Innovation and Research Lab and onsite food technologist and business development manager, to support food innovation programmes.

Section 9.7 of the RSES refers to access to arts, culture, language and heritage, with specific objectives RPOs 9.24-9.30 to guide the Planning Authority.

4.2.13 Community, Recreation, Amenity and Social Inclusion

Healthy Placemaking is one of the key principles of the RSES, aimed at promoting peoples’ quality of life through the creation of healthy and attractive places in which to live, work and visit. The information contained as part of Chapter 9 of the RSES and associated RPOs, which details subjects including diversity, inclusivity, housing, regeneration, healthy placemaking, social opportunity, economic opportunity, access to childcare, education, health services and access to arts, culture, language and heritage, will support the Planning Authority in developing relevant policy for the future CDP.

The NPF places more emphasis on consolidating the development of places that grew rapidly in the past decade or so with large scale commuter driven housing development with a particular focus on identifying and prioritising infrastructure and local community and amenity facility provision in many of the larger commuter towns through targeted investment. It is recommended that the Planning Authority conducts a Social Infrastructure Assessment including audit to inform this section of the CDP, to support the identification of existing community facilities and gap analysis for communities within the County.

The NPF seeks to build on the progress made in developing an integrated network of greenways, blueways and peatways, that will support the diversification of rural and regional economies and promote more sustainable forms of travel and activity-based recreation utilising canal and former rail and other routes.

4.2.14 Cross Border

Chapter 11 of the RSES examines All-Island Cohesion and although it is not specifically referenced in the Issues Paper, it is recommended that the Planning Authority supports the RPOs in this section in the new CDP. NPO 57 also supports cross border co-operation, particularly along the Dublin-Belfast Corridor. The Planning Authority is



referred to the NPF which also identifies areas for cross-border local co-ordination with regional cooperation, joint initiatives and co-ordinated spatial planning.

4.2.15 Environmental Assessment

The Council is directed to the SEA Guidelines for Regional Assemblies and Planning Authorities prepared by the DHLGH (March 2022) which were formally issued under Section 28 of the Planning and Development Act 2000, as amended.

The Assembly recommends early engagement with the relevant bodies including the Environmental Protection Agency, the National Parks and Wildlife Service, Department of Climate, Energy and the Environment, Department of Agriculture, Food and the Marine, Office of Public Works, Transport Infrastructure Ireland, Uisce Éireann, and adjoining planning authorities in relation to any significant transboundary environmental effects.

4.2.16 Monitoring and Implementation

The CDP should include a section on monitoring and implementation of the CDP, with a commitment to reporting on SEA Monitoring during the implementation of the Plan.

5.0 Recommendations and Observations

The following recommendations are made:

1. The CDP is materially consistent with the RSES for the Eastern and Midland Region (RSES) and any future RSES that may be adopted during the CDP review process.
Reason: To ensure full alignment between local, regional and national planning policy in line with the Planning and Development Acts 2000 to 2025.
2. The Planning Authority undertakes the Development Plan review in accordance with the new legislative requirements and demonstrates consistency with Project Ireland 2040 and other national policies.
Reason: To ensure full alignment between local, regional and national planning policy, the economic policies and objectives of the Government and any other relevant national planning policies and measures in line with the Planning and Development Acts 2000 to 2025.
3. Should the Planning Authority decide to revisit the categorisation and tiering of lower-level settlements in developing the County's Settlement Hierarchy, the Assembly directs it to Section 3.1 and Appendix A of the RSES which provides detail on the Asset-Based Approach to spatial development, or any update as part of any future RSES that may be adopted during the CDP review process.
Reason: To ensure the proper planning and sustainable development of Co. Louth in a manner consistent with the RSES and any future RSES that may be adopted during the CDP review process.
4. That the Planning Authority shall ensure, that the Dublin-Belfast Economic Corridor (DBEC) is supported in the new CDP to enable it to meet the objectives set out in the NPF and RSES.
Reason: To ensure the proper planning and sustainable development of Co. Louth in a manner consistent with the RSES and any future RSES that may be adopted during the CDP review process.
5. That the Planning Authority shall ensure, when making the County Development Plan, that the co-operation with relevant Departments, Regional Assemblies and Local Authorities in Northern Ireland, is promoted, to further support and develop the economic potential of the Dublin-Belfast Corridor (particularly the core Drogheda-Dundalk-Newry network) to promote and enhance its international visibility and to promote All-Island Cohesion.
Reason: To ensure full alignment between local, regional and national planning and economic policy, the economic policies and objectives of the Government and any other relevant national planning and economic policies and measures.
6. That the Planning Authority shall align with the Transport Strategy set out in the RSES and considers strategic investment priorities including additional public-transport infrastructure and the recommendations in the All-Island Strategic Rail Review 2024; support integrated land use and



transportation planning objectives including the application of Transport Orientated Development (TOD) principles; and coordinates with nearby local authorities, EMRA, the NTA and TII to ensure consistent regional frameworks.

Reason: To ensure full alignment between local, regional and national planning and transport policy, the transport policies and objectives of the Government and any other relevant national planning and transport policies and measures; evidence based integrated land use and transport planning; and strengthen the Dublin-Belfast Economic Corridor.

7. That the Planning Authority shall ensure, when making the County Development Plan, that the cultural and natural heritage aspects presented are consistent with the NPF which emphasises the need for protection and restoration of biodiversity including protected habitats and species, integration of biodiversity protection and restoration in planning and development, a consistent/strategic approach across local authorities on their Local Biodiversity Action Plans influenced by the National Biodiversity Action Plan and implementation of a new National Nature Restoration Plan.

Reason: To ensure full alignment between local, regional and national planning and policy and any other relevant national planning policies and measures pertaining to biodiversity and natural heritage.

8. That the Planning Authority shall ensure, when making the County Development Plan, that the cross-cutting climate action aspects presented are consistent with the RSES Climate Action Strategy, the Climate Action and Low Carbon Development (Amendment) Act, the National Climate Action Plan (reviewed annually) and the Louth Climate Action Plan 2024-2029.

Reason: To ensure the proper planning and sustainable development of County Louth in a manner consistent with the RSES and any future RSES that may be adopted during the CDP review process.

9. That the Planning Authority shall ensure, when making the County Development Plan, that the renewable energy aspects presented take account of and are consistent with the RSES Climate Action Strategy, the National Climate Action Plan and the Louth Climate Action Plan 2024-2029 and NPO 75 of the NPF which requires local authorities to plan for the delivery of future Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their Development Plans.

Reason: To ensure the proper planning and sustainable development of County Louth in a manner consistent with the RSES and any future RSES that may be adopted during the CDP review process.

10. The Assembly recommends early engagement with the relevant bodies in relation to the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

Reason: To ensure the proper planning and sustainable development of Co. Louth in a manner consistent with the RSES and any future RSES that may be adopted during the CDP review process, and to have regard to the Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities issued under Section 28 of the Planning and Development Acts 2000, as amended.

The following observations are made:

1. The Planning Authority is reminded of its obligation under the NPF to prepare/update a Housing Need Demand Assessment (HNDA) to align with updated data sources, in order to support the preparation of housing strategies and all related housing policy outputs, including the County Development Plan.

Reason: To meet existing and future housing need and demand and ensure full alignment between local, regional and national planning policy and to 'housing growth requirements' for Louth as set out in the Guidelines for Planning Authorities on National Planning Framework Implementation – Housing Growth Requirements issued under Section 28 of the Planning and Development Act, 2000-2025.

2. The Assembly refers the Council to the Regional Development Monitor (RDM), which provides a series of national mapping and visualisation infrastructures to assist planners and policy makers in gaining a greater insight into social, economic and environmental trends to aid better policy formation and decision making.

Reason: In the interest of best practice.

3. The Assembly refers the Council to the 15-Minute City Implementation Pathway report published by the



Assembly, which identifies public policy support, ongoing actions, good practice examples and funding opportunities for '15-Minute City' and '10 Minute Town' concepts.

Reason: In the interest of best practice.

4. The Assembly refers the Council to the Sustainable Mobility Academy which is a repository of knowledge, showcasing case studies, project outcomes, and ongoing advancements across all local authorities in the area of active travel and sustainable mobility.

Reason: In the interest of best practice.

5. The Assembly refers the Council to its submission to the Public Consultation on Accelerating Infrastructure Delivery by the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation which identifies barriers to infrastructure delivery in the context of the RSES and proposes a range of solutions to address those barriers.

Reason: To inform infrastructure provision that underpins sustainable development, enhances connectivity, supports enterprise activation, and complies with environmental and climate obligations.

6. The Assembly refers the Council to the Interreg Europe ORIGINN project which is working to promote the economic and social transformation of rural areas through innovation, with a particular focus on digitalisation, green economy, industrial sustainability, social innovation, and soft innovation in the agri-food sector.

Reason: In the interest of best practice.

7. The Assembly refers the Council to the ESPON QGasSP Targeted Analysis Project and the resulting Greenhouse Gas Impact Assessment Tool and case study pilots. This may assist with a detailed climate assessment in the SEA and could be used alongside the National Transport Authority's transport modelling to evaluate the climate impacts of alternative plan scenarios.

Reason: In the interest of best practice regarding the development of a user-friendly tool for quantifying and forecasting the relative GHG impacts of alternative spatial planning policies in Ireland; and strengthen the SEA process.

8. The Assembly refers the Council to a range of resources developed by the Assembly to support the implementation of RSES objectives for ecosystem services and green infrastructure. These resources include a green infrastructure and ecosystem services mapping methodology, policy briefs which include 'how to' recommendations, good practice handbooks, and infographics.

Reason: In the interest of best practice.

Chief Executive Opinion on Issues raised:

The Chief Executive thanks the Eastern and Midland Regional Assembly for their detailed response across a range of topic areas. The information provides great insight into current legislation, policies, and guidance and sets the pathway for the region to achieve the necessary goals and objectives.

The submission will help guide the formulation of the draft Plan, having regard to the stated national and regional legislation and policies. The response also helpfully includes a number of recommendations and observations which will be considered and implemented if deemed suitable for the County.

Following the formulation of the Draft Plan, the EMRA will again have an opportunity to make a submission on its contents.

Chief Executive Recommendation:

Consider the information, recommendations and observations set out in the EMRA submission in the formulation of the Draft Plan and incorporate appropriate policy objectives and narrative text.



Submission Ref. No:

LH-C144-DPIP-26

Submitted By:

Office of Public Works

Summary of Main Issues Raised:

The Office of Public Works (OPW) is the lead agency for the coordination of an integrated, 'whole-of-government' approach to flood risk management in Ireland. This submission is made specifically concerning flooding and flood risk management.

Flood Risk Management (FRM)- General Guidance

The revision of the National Planning Framework (2025) sets out National Policy Objective 78 to '*Promote sustainable development by ensuring flooding and flood risk management informs place-making by:*

- *Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management.*
- *Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.'*

In this context, reference should be made to the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) issued under Section 28 of the Planning Act, hereafter referred to as the 'Guidelines', and associated Circulars and Technical Appendices. The key principles of flood risk management and sustainable planning shall be adopted in the CDP. The sequential approach to managing flood risk should be considered at the earliest stage, and where uncertainty exists, the precautionary approach should be taken or furthermore detailed assessment carried out before decisions are made, rather than delegating decisions to the development management stage. A three Stage Flood Risk Assessment (FRA) process should be used to identify whether potential flood risk may exist, the degree to which it is an issue, and what assessment to a scale proportionate to the risk should be carried out. This process is:

Stage 1 Flood Risk Identification: To identify whether there may be any flooding or surface water management issues related to a plan area or proposed development sites that may warrant further investigation.

Stage 2 Initial Flood Risk Assessment: To confirm sources of flooding that may affect a plan area or proposed development sites, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve the preparation of indicative Flood Zone maps. Where hydraulic models exist, the potential flood impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment should be scoped out.

Stage 3 Detailed Flood Risk Assessment: To assess flood risk issues in sufficient detail to prepare Flood Zone maps based on a quantitative appraisal of potential flood risks to a proposed or existing development or to land that is being considered for zoning, and to identify potential impacts on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

Particular attention shall be paid to the following sections of the guidelines: Chapter 3 – The Planning Principles, Chapter 3 – The Sequential Approach, and definitions of Appropriate Development, Chapters 3 and 4 – The Plan-making Justification Test where it is intended to zone or otherwise designate land where there is a moderate or high probability of flooding, noting that the application of the test should be supported by analysis to an appropriate level of detail.

Clear commitments and strategic objectives contained within the Draft Plan regarding flood risk and the principles of the Guidelines should be reviewed by persons with the relevant experience.

Sequential Approach

Using mapped flood zones alongside considerations of the vulnerability of different types of development, to



give priority to development in areas of low flood risk. Only if there are no reasonable sites available in zones of low flood risk then should consideration be given to development in higher flood probability zones. Proposed land use zonings should be overlaid with both Flood Zone A and B and should be at reasonable scale and clearly legible.

Justification Test

Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A. In exceptional circumstances, development that is generally considered inappropriate because of its vulnerability to flooding may be justified as appropriate on the grounds of proper and sustainable development provided the risks are reduced/managed to an acceptable level. Land use zonings, informed by the suitable level of FRA and if necessary, a Justification Test, should be concluded at the Plan-making stage. The Justification Test applies only to the urban centre (core area of city, town, village which acts for a broad range of uses) and would not be applicable to the periphery of urban areas.

There are three criteria that must be satisfied as part of the Justification Test, with the third being the FRA. The FRA shall demonstrate that flood risk can be adequately managed and the use or development of the lands will not cause unacceptable impacts elsewhere. Louth County Council should specify structural or non-structural measures as pre-requisites to development and provide information on the residual risks that would remain and how they might be managed. Inappropriate development that does not satisfy all criteria of the Justification Test should not be considered at the Plan-making stage.

Specific Flood Risk Management Issues for Consideration

The Flood Risk Management Plans and Flood Maps

The OPW in conjunction with Councils undertook the National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme, through which the Flood Risk Management Plans (FRMPs) were prepared and subsequently adopted by the Minister under the Floods Directive as transposed by the Project 2040 National Development Plan. The implementation of these Plans is an objective of the Regional Spatial and Economic Strategies. It is noted that Louth County Council adopted the FRMPs relevant to its area. The CFRAM programme included analysis of flood risk in Annagassan, Ardee, Baltray, Bellurgan, Blackrock South, Carlingford & Greenore, Carrickmacross, Drogheda, Dundalk and Termonfeckin. In the 3rd cycle review of the National Preliminary Flood Risk Assessment (PFRA) Bellurgan was designated an Area of Potentially Significant Flood Risk (APSFR). In this context:

- The OPW requests Louth County Council has full regard in the Draft Plan to the ongoing design, planning and implementation of a Flood Relief Scheme (FRS) in Ardee, Baltray, Carlingford & Greenore, Drogheda and Dundalk, to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures, with a specific policy objective included regarding this. Flood Zones should be defined ignoring the presence of defences, and the recent or imminent construction of FRS have/will not amend the flood zoning of the areas protected by the scheme.
- The OPW has a statutory duty to maintain flood relief schemes under the Arterial Drainage Acts, 1945-95. Louth County Council will also need to maintain any FRS under its powers. The OPW requests Louth County Council have regard in the Draft Plan to the protection, and the need for maintenance, of these schemes. Louth County Council might also wish to include a register of key flood risk infrastructure where it would not otherwise be readily identified or protected from interference or removal.
- The Planning Authority should have regard to the flood maps produced under CFRAM in both forward planning and development management. Where physical changes have occurred, where there is evidential robust additional sources of information, such as site-specific FRA or where local, more recent studies have been undertaken, this information can and should be included in the preparation of the Strategic Flood Risk Assessment, the identification of the Flood Zones and the making of spatial planning



decisions.

- The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change are available to view on the OPW portal, www.floodinfo.ie.

Map Review Programme

Since the preparation of the flood maps under the CFRAM program, a range of factors may have occurred which have resulted in this information requiring updating. Flood mapping produced under the CFRAM programme is currently under review at the following locations: Bellurgan and Drogheda. Louth County Council should note that these areas may change as part of the review process, with latest information available via www.floodinfo.ie/map-review/

National Indicative Flood Mapping

The updated indicative flood mapping outlined below were prepared as an initial assessment of flood risk and provide only an indication of areas proven to flooding and are therefore not necessarily locally accurate. Therefore, these maps should be used for strategic-level assessments and not for the sole basis for defining Flood Zones or making planning policy. These include National Indicative Fluvial Mapping (NIFM), National Coastal Flood Hazard Mapping, National Groundwater Flood Mapping, Pluvial Flood Mapping.

Consideration of Climate Change Impacts

The potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. The Revision of the National Planning Framework notes that ‘the consideration of potential and future flood risk in the area of planning and development management’ is of particular importance.

In line with Guidelines, while Flood Zones are defined on the basis of current flood risk, Louth County Council should consider such impacts in the preparation of the plan, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives. The National CFRAM and national indicative flood maps include maps for two potential future scenarios taking account of different degrees of climate impacts.

Coastal Change

While not specifically covered by the Guidelines, Louth County Council should have regard to areas at may be at risk or vulnerable to coastal erosion or coastal change, including change associated with climate change (e.g. sea level rise, increased storm frequency, accelerated rates of coastal erosion etc).

In 2023, the Government approved the Report of the Inter-Departmental Group on National Coastal Change Management Strategy and has established an Inter-Department Group on Coastal Change Management, chaired by the Dept. Housing, Local Government and Heritage, to oversee the implementation of the recommendations of the Report.

Louth County Council should continue to identify potentially vulnerable locations that could be affected by coastal change. Where coastal change is considered of risk, consideration should be given to the merits of undertaking a Coastal Erosion Risk Management Study, in consultation with the OPW, to assist in identifying areas at risk of coastal erosion and change. A precautionary approach should be taken where this analysis has not yet been carried out.

It is recommended that the Draft Plan puts in place spatial policies to limit development in areas that may be subject to coastal erosion over the long term, in the interest of not increasing the development at risk from erosion and coastal change. The Draft Plan should reflect the risk and avoid intensifying existing development uses or location new inappropriate development within the zone(s) most at risk from coastal change and potential locations where managed retreat may be feasible or necessary. Policy should be aligned, where necessary, to facilitate managed retreat particularly with respect to the location of new replacement dwellings,



structures and or development.

Arterial Drainage Schemes and Drainage Districts

The OPW requests Louth County Council have regard in zoning land for development to ensure access requirements are preserved for maintenance of Arterial Drainage Schemes and Drainage Districts. Applications for development on land identified as benefitting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The location of Arterial Drainage Schemes and Drainage Districts can be view via www.floodinfo.ie

Land Protected by Agricultural Embankments

Flood zones are defined ignoring the presence of flood defences. This is of importance in the context of land benefiting from some degree of protection from embankments that protect agricultural lands, i.e. as part of an Arterial Drainage Scheme or Drainage District or the so-called Land Commission Embankments (see www.floodinfo.ie). It is strongly recommended that land should be zoned for development in accordance with the definition of appropriate development as set out in the Guidelines.

Impacts on Other Areas

While a development may not be prone to flood risk itself, it can increase flooding up- or down-stream due to increased runoff from additional drainage or increased paved areas or due to loss of storage. As per Guidelines, new development needs to avoid increasing such flood risk.

Nature-based Solutions and SuDS

The OPW advises the Draft Plan should take account of the opportunities for nature-based solutions to reduce runoff and provide other benefits such as to water quality, biodiversity etc. This can be in existing or new developments. Louth County Council should refer to The Best Practice Interim Guidance Document ‘Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas’, as well as the Guidance Document for Planners, Developers and Developers Agents ‘Implementation of Urban Nature-based Solutions’ for further guidance.

The Guidelines recommend that a SFRA provide guidance on the likely applicable of different SuDs techniques for managing surface water run-off at key sites and also identifies where integrated and area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Access to Flood Mapping and Spatial Data

The OPW provides access to a range of flood mapping resources and spatial datasets to support planning, risk management, and public awareness. Flood maps, including potential future scenario mapping taking account of climate change, are available to view on the OPW’s dedicated flood information portal www.floodinfo.ie.

A selection of flood-related spatial datasets are available for direct download from Ireland’s National Open Data Portal, <https://data.gov.ie/organization/office-of-public-works>. If specific datasets are not available through the portal, users can request access by completing a Data Request Form, available at <https://www.floodinfo.ie/open-spatial-data-portal/>. Completed forms should be submitted to the OPW Data Management Section by email (flood_data@opw.ie).

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of flood risk management in the plan preparation process. A Strategic Flood Risk Assessment (SFRA) for the County will be prepared in accordance with the requirements of ‘The Planning System and Flood Risk Management Guidelines’ (2009). The most recent flood mapping data will be used to inform the SFRA. Regard will be given to the Planning Principles, Sequential Approach and

definitions of Appropriate Development as set out in these Guidelines in the preparation of the Plan. The Draft Plan will recognise the importance of the Flood Relief Schemes within the County and will include policy objectives supporting the progression and implementation of these projects.

Any amendments to current land use zonings within the County will have regard to the most up to date flood zone data.

The Draft Plan will recognise the benefits of Sustainable Urban Drainage Systems (SuDS) in reducing run-off and will include a narrative, and policy objectives relating to same. The SFRA will identify any lands that have benefitted from works as part of an Arterial Drainage Scheme. Any amendments to land use zonings of lands that have benefitted from such schemes will have regard to the requirements of ‘The Planning System and Flood Risk Management Guidelines’ (2009).

Chief Executive Recommendation:

Undertake a SFRA for the County in accordance with the requirements of ‘The Planning System and Flood Risk Management Guidelines’ (2009), using the most up to date flood data.

Include relevant policy objectives and zonings based on relevant guidelines, flood data and flood relief schemes.

Incorporate a narrative and policy objectives regarding SuDS.

Submission Ref. No:

LH-C144-DPIP-28

Submitted By:

Steven Peck Chartered Town Planner on behalf of Leamai Properties Limited

Map showing land subject to Submission:

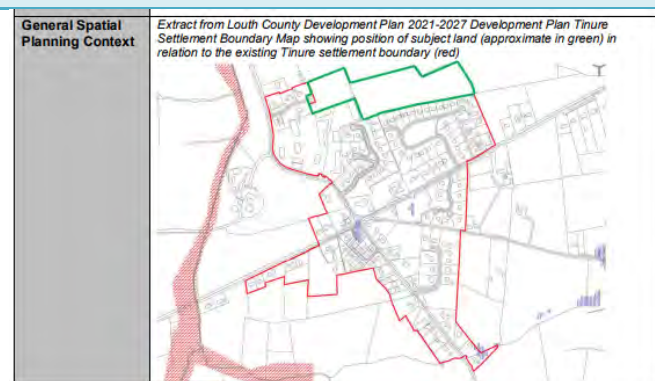


Figure 1: Map included as part of submission illustrating the lands subject of this submission in green.

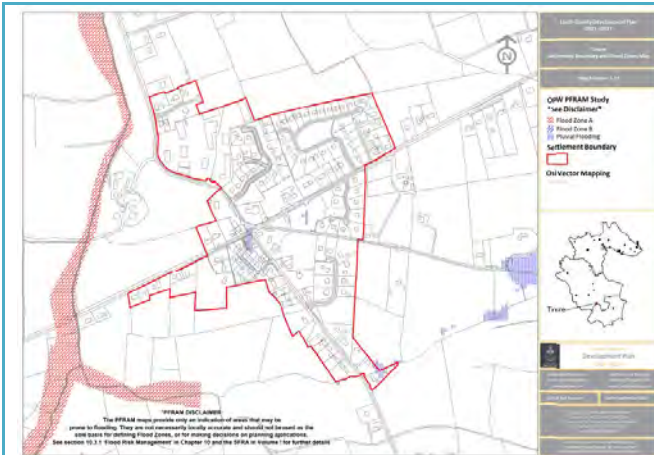


Figure 2: Extract from Volume 2 – Section 3 - Louth County Development Plan 2021 – 2027 – Rural Nodes – Boundary Maps showing Tinure Boundary Map illustrated with red line boundary.



Figure 3: Map showing Tinure Rural Node dissected by two Rural Policy Zones – Light Green Rural Policy Zone 2 & darker green Rural Policy Zone 1.

Summary of Main Issues Raised:

The submission relates to the settlement of Tinure which is designated as a ‘Rural Node’ under the current Louth County Development Plan 2021-2027. The submission consists of two parts.

Part 1 requests the redesignation of Tinure from a Rural Node to a Category 4 settlement.

Part 2 is a contingency submission if Part 1 is not accepted. This part of the submission requests that the boundary of rural nodes should be sufficiently large enough to allow them to adequately cater for local needs housing. To comply with this there would be a need to enhance the policies around rural nodes including support for small scale multi-unit developments in these locations. The rationale for allowing additional housing to be built in rural nodes is that people can’t qualify on local needs grounds to build within Rural Policy Zone 1.

The submission advises that the north side of Tinure is the most suitable to extending the boundary of the settlement as it is entirely located within Rural Policy Zone 2. (See Figure 3 above).

The submitter confirms that this submission does not fall within the restriction under Section 11 (2) (bc) of the Planning & Development Act 2000 as it is a high-level submission and does not request the rezoning of lands at this stage.

Part 1



The submission puts forward the case that Tinure exhibits the characteristics of a 'Category 4 settlement' as defined in the current plan as opposed to its current designation as a 'Rural Node'.

To support this assertion the submission has used a comparison tool to assess existing Category 4 settlements within Co. Louth against a series of benchmarks (previously used by the Eastern and Midland Regional Assembly (EMRA) preparing their Eastern and Midland Regional Spatial and Economic Strategy) to determine the EMRA RSES settlement hierarchy. Here key criteria were assessed against each settlement with respect to Population, Employment/Services and Facilities, Educational & Health Facilities, Accessibility/Public Transport and Water Services Infrastructure.

The result of this comparison indicates that Tinure performs strongly against the relevant criteria than most of the existing Category 4 settlements. In Co. Louth.

Conclusion

It is considered that Tinure exhibits the characteristics of a Category 4 settlement and the settlement is constrained presently and cannot deliver sustainable local growth and its current designation means that it cannot achieve the new population/housing targets set out within the revised National Planning Framework. Accordingly, the submission seeks the redesignation of Tinure as a Category 4 Settlement.

Submission Overview

If the Council accepts the rationale as advised in Part 1 then the Tinure should be allocated an appropriate level of additional population/housing growth consistent with the settlements new role in supporting local growth. The submission considers that Tinure should be allocated proportionately more housing growth than other Category 4 Settlements given the level of its existing social infrastructure. Tinure is located within good access of the M1 motorway and could facilitate sustainable economic growth. There is existing water capacity available in Tinure and an upgrade of the Tinure WWTP is planned or underway.

The submission seeks the extension of the north side of Tinure settlement boundary to facilitate the expansion of Tinure. The lands highlighted in green in Figure 1 are suitable in planning terms and are available for development.

The submission advises that the southern, eastern and western portions of Tinure are located within the wider designated Monasterboice Tentative World Heritage Site Zone (MTWHZ) and Policy BHC 19 of the current plan seeks to maintain the Outstanding Universal Value (OUV) of the Tentative World Heritage Site of Monasterboice and support its nomination as a UNESCO World Heritage Site. The wider designated zone for the MTWHZ crosses through the settlement of Tinure and aligns with the Rural Policy Zones as detailed in Figure 3 above. To the west there is an area of fluvial flood extents which also restricts the wider development of these areas.

The submission has submitted a concept scheme to illustrate that the lands identified in green in Figure 1 can be developed for housing. A design concept has previously been prepared for these lands indicating layout and form of the proposed development. All these lands are within the control of his client.

Part 2

This part of the submission is a contingency submission if Louth County Council does not agree that Tinure should be redesignated from a Rural Node to a Category 4 settlement.

The focus of this part of the submission seeks to establish that Rural Nodes have an important role to play in providing sustainable accommodation for persons with rural housing needs. The ability to build their house within these settlements is seen as important and should be made available. While the current plan does allow some rural needs housing, the quantum of lands set aside is limited and there is a need to have enhanced policies put in place to support the development of rural nodes.

The immediate environs of Tinure straddle two rural Policy zones namely Rural Policy Zone 1 & 2. The southern



portion of Tinure comes under the influence of the 'wider zone of the Tentative World Heritage Site at Monasterboice'. This southern portion aligns with the boundary of Policy Zone 1 in the immediate environs of Tinure. Obtaining planning permission for a one-off house in these zones is subject to local needs qualifying criteria.

This submission puts forward the rationale that Tinure Rural Node should provide an alternative to one off house building by providing housing opportunities within the rural Node of Tinure thus enhancing the sustainability of these rural Nodes and responding to local demands.

The submission argues that the boundaries of Rural Nodes should be reviewed and revised to include sufficient lands within the boundaries to allow them to grow and develop. The new development Plan for Louth should have enhanced policies directing population into rural nodes particularly rural housing developments given the existing restrictions on one off housing in the immediate environs of Tinure. The submission notes that lands to the northern side of Tinure would be appropriate for development given it is unaffected by restrictive planning policy areas.

The submission concludes that the subject lands to the north of the settlement are available and are considered to have road access via White River Manor Estate Road and any housing permitted could potentially use individual domestic wastewater systems that connect to Uisce Éireann planned network or any planned upgrade of the existing wastewater treatment plant. A density of 7 units per hectare is considered appropriate for this location. Given the size of the holding, it is envisaged that 33 dwellings could be developed on these lands.

Chief Executive Opinion on Issues raised:

Part 1 of this submission requests the redesignation of Tinure from a Rural Node to a Category 4 settlement.

As part of the preparation of the Draft Plan a review of the settlement hierarchy will be carried out, including whether or not Tinure should be re-designated from a 'Rural Node' to a 'Small Town/Village'.

When zoning residential land regard shall be had to any relevant Guidelines published under Section 28 of the Planning and Development Act 2000 (as amended) including the 'NPF Implementation Housing Growth Requirements' thereby ensuring there is sufficient zoned land in County to meet the New Annual New Housing Growth Requirements. It is the policy to continue to promote the towns of Dundalk and Drogheda as Regional Growth Centres and support compact growth and the development of infill/brownfield sites.

Part 2

Rural Housing

An assessment of applications in the wider area will be undertaken to establish the extent of grants and refusals for one off housing in Rural Policy Zones 1 and 2 and within the wider zone of the designated Monasterboice Tentative World Heritage Site Zone (MTWHZ). While the applicant has undertaken its own research and identified lands to the northern portion of the Settlement of Tinure (within their applicant's control) the forward planning unit will require to verify whether the restrictions on planning has resulted in the requirement for additional lands to be set aside in Rural node locations for housing. The Core Strategy in the Draft Plan will reflect the allocation provided to Louth in the NPF Implementation: Housing Growth Requirements Guidelines published in July 2025.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and

the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in green in Figure 1 at this stage of the plan review process. It is noted that the lands subject of this submission is currently outside of and immediately adjacent to the settlement boundary of Tinure Rural Node as shown in Figure 1 above.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted. The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

To review the settlement hierarchy of the County as part of the preparation of the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-29

Submitted By:

Gillian Hoey

Map showing land subject to Submission:



Figure 1: Image included as part of submission.

Summary of Main Issues Raised:

The submission raises concerns regarding the Rural Node designation in Darver and the restrictions it places on local needs eligibility, despite a long-standing and genuine connection to the area.

It is stated that the submitter resides in Darver Rural Node, which contains eight houses, a crèche, school, church and graveyard. They grew up in the area and wish to build a home locally, however, due to the small size of the rural node and absence of sites they are effectively prevented from building within their own community. This impacts on the creche business therefore impacting upon the local community.

A site is available 2km from the family home, however under the current Local Needs criteria, they are deemed ineligible as they reside within the designated rural node. This means that individuals living as close as 400m from their home are eligible to build upon the site whereas they are not- this feels fundamentally unfair and



inconsistent with the intended purpose of the policy.

At no point where residents informed their property was to be placed within a rural node. Given the implications, they firmly believe residents should be directly notified.

They have been advised by the Council that they may build within the Darver Rural Node or in any other rural node. Having reviewed the others but have found no available sites. It is therefore requested either:

1. A review of the Rural Node designation in Darver, with consideration that the node should encompass the wider Darver area, rather than restricting eligibility to those living within an extremely small cluster of houses.
2. An exemption to the Rural Node rule in my case, acknowledging my lifelong connection to the Darver area, my family's long-established presence, my childcare and employment needs, and the impact that refusal would have on both my family and the wider community.

It is believed these requests are in keeping with the spirit and purpose of Local Needs policies which are intended to allow people with strong roots to the area to remain as part of the community.

Chief Executive Opinion on Issues raised:

Rural Nodes act as important focal points within the rural area for social and economic functions. The potential for existing rural nodes to accommodate further growth will be examined as part of the preparation of the Draft Plan. This examination will be carried out in the context of the level of services currently available, the landscape in which the settlement is located, the availability of water services infrastructure, and the quality of the local road network.

Chief Executive Recommendation:

Undertake a review of the existing policy objectives and associated narrative relating to Rural Nodes alongside an analysis of the level of development that has taken place in the rural nodes during the life of the current Plan.

Submission Ref. No:

LH-C144-DPIP-30

Submitted By:

A F

Summary of Main Issues Raised:

More Bridges

If you want to move north/south in Drogheda you have no option but to squeeze through the middle section of the town, over one of its' three closely positioned road bridges. It is suggested that a pedestrian/cyclist bridge or road bridge is positioned from Mell to/around LMFM.

When travelling from Termonfeckin/Greenhills to Mornington, you must go into the centre of the town which leads to congestion, which puts businesses off locating in the town and impacts on residents' wellbeing/sense of place. It is suggested that a swing bridge/tunnel be located at the bottoms of Greenhills to Boyne Fisherman's rescue. This would provide a link from Port Access Northern Cross Route (PANCR) to South Gate providing an alternative to St Mary's Bridge.

Simplify Drogheda's Mary's Bridge Junctions



The submission suggests various alterations to Drogheda one way system which would ultimately result in all traffic entering Shop Street from the West Street/Peter Street/Laurence’s Street junction in having to exit via Dyer Street. This would enable the creation of a public space and would enable traffic lights to be removed and ease traffic congestion. Pedestrian crossing lights should be maintained and sequenced with the junction of St. Mary’s Bridge/Marsh Rd and the dual carriageway.

North Drogheda Train Station Required

PANCR has been life changing and a bridge over trainline is required. Lands should be purchased to provide a park and ride train station. This facility could be used for residents to avail of DART+ trains departing from the existing train station. It would encourage investment, improve sense of place and sustainable movement of people, support population growth and promote positive climate change.

Chief Executive Opinion on Issues raised:

A Local Transport Plan (LTP) is currently being prepared for Drogheda. As part of the preparation of the LTP Meath and Louth County Council’s will be engaging with the relevant stakeholders including the National Transport Authority, Irish Rail, and Transport Infrastructure Ireland. This will provide a policy framework for transport related developments in the town including the potential requirement for a Train Station in the north Drogheda area.

Chief Executive Recommendation:

To incorporate the findings of the Drogheda Local Transport Plan into the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-31

Submitted By:

Neal Myles

Summary of Main Issues Raised:

The submission sets out the following concerns in relation to restrictions imposed on landowners (who are not farmers) who wish to build on their own land:

- The need for farmer’s having children living on the farm is obvious however the need for ‘family hubs’ where intergenerational support for family members seems to be less obvious.
- Grandparents assisting with childing minding on site enables parents to remain in the workforce and likewise, children providing assistance and support to aging parents can allow them to remain in their own homes as long as possible, freeing up nursing home beds.
- The submission agrees that there is a need for settlement boundaries however these boundary lines should not be set in stone and a buffer zone should be provided to allow family lands to be considered for a family home where family lands have been divided by the boundary lines on a map.
 - Submission sets out the impact of the settlement boundary on their land with the family home being immediately inside the settlement boundary and the remainder of the family land being outside of the boundary (a map or details of the family lands in question is not included as part of the submission).



- The “10 Year Rule” set out in the Rural Qualifying Criteria should be reviewed as it is penalising young people for deciding to buy a house by denying them the right to apply for planning permission due to the 10 year rule (an applicant shall not own or have sold a residential property in the county for a minimum of 10 years prior to making the application).
- Request that the edges of settlements, like Termonfeckin, are reviewed and to consider the extent of public services already in place to maximise the utilisation of these infrastructure assets.

Chief Executive Opinion on Issues raised:

A key element of the growth strategy within the National Planning Framework and the Regional Spatial and Economic Strategy continues to be the need to achieve targets for compact in urban areas. The Draft Plan will review all policies in relation to growth both within the existing settlements and the qualifying criteria for rural housing policy having regard to national and regional policy and guidelines.

As part of the preparation of the Draft Plan, an assessment of the capacity of the existing settlements will be carried out to determine if additional lands are required to meet with the housing targets contained within the Core Strategy. Any amendments to defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

While the submission did not include specific details or a map illustrating the location of their lands outside of a settlement boundary, in any case, the rezoning of particular parcels of land cannot be considered at this stage of the process having regard to Section 11(2)(bc) of the Planning and Development Act 2000 (as amended).

Should the submitter wish to have a specific parcel of land considered for re-zoning, they are advised to engage at the public consultation stage following the publication of the Draft Plan and lodge a submission and an associated map to depict the particular lands in question at that juncture.

Chief Executive Recommendation:

The Draft Plan will include a Core Strategy and Settlement Hierarchy for the County and policy guidance in relation to housing and population targets which will be in prepared in accordance with the Core Strategy and Settlement Hierarchy of the Draft Plan.

Policy relating to the qualifying criteria for one-off rural housing will be reviewed and will be informed by national and regional guidance.

Submission Ref. No:

LH-C144-DPIP-33

Submitted By:

Uisce Éireann

Summary of Main Issues Raised:

National and Regional Policy

Uisce Éireann are committed to supporting the policies in the National Planning Framework and Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) in relation to the sustainable management of water supply and wastewater needs subject to budgetary and environmental constraints.

Uisce Éireann will continue to work closely with Louth County Council to identify water services required to support planned developments for inclusion in the Irish Water Capital Investment Plan.



Uisce Éireann Key Policies and Plans

The submission sets out details of the Strategic Funding Plan 2025-2029, the Capital Investment Plan and Water Services Strategic Plan.

The primary function of Uisce Éireann is to provide clean drinking water and treat and return wastewater.

The Eastern and Midland Regional Water Resources Plan has been prepared with a focus on improved performance on water supplies, strategic transformation to a more resilient interconnected water supply and the ability to support growth and economic development.

Uisce Éireann have adopted the World Health Organisation (WHO) Water Safety Plan approach to guarantee the protection and restoration of the quality of raw water.

Uisce Éireann supports the River Basin Management Plan Implementation Strategy to identify pressures on the water system and to set environmental objectives. Uisce Éireann is also preparing sectoral action plans to manage individual river basins and works with local authorities through the local authority water programme through data sharing to manage these.

Uisce Éireann encourages the uses of green and blue infrastructure and Sustainable Urban Drainage Systems (SUDS) in new and retrofitting developments in line with NPO 57 of the NPF and would be open to collaborating on developments to implement these. Uisce Éireann will also work similarly in leveraging circularity opportunities to support a sustainable bioeconomy.

Water Services Infrastructure Ability

There is currently good water supply for Louth, but some local service upgrades may be needed.

Works to increase network capacity are programmed for Dundalk and Drogheda. There are some constraints in Dunleer and analysis is ongoing. In addition, Uisce Éireann are also progressing leakage reduction and lead replacement activities.

There are a large number of wastewater plants in County Louth and available capacity at any plant varies daily. Where there are constraints, applications for developments would be on a first come first serve basis. Where no developments are proposed on constrained lands, private developments may occur. While there are constraints in larger settlements like Blackrock, Uisce Éireann is already committed to filling in these gaps.

Uisce Éireann also has drainage area plans for both Dundalk and Drogheda, which include provision for sewer rehabilitation activities, maintenance at pump stations and storm overflow assessments. Despite these plans however, there will be a need to prepare Integrated Urban Wastewater Management Plans where Louth County Council and Uisce Éireann will need to collaborate.

Land Development Issues

Uisce Éireann can help Louth County Council identify suitably zoned lands from a water services perspective, however network extensions may be required to service newly zoned sites. Uisce Éireann can also assist in the planning for private water services, should sites fall short of the criteria under the pre-connections enquiry process for connecting facilities to the public water network. Guidelines for zoning development lands without any water infrastructure is governed by the draft water services guidelines for planning authorities (2018) document.

Lands close to wastewater treatment plants must avoid sensitive uses like dwellings, including plans for new plants.

Uisce Éireann has engaged with the Department of Housing Local Government and Heritage (DHLGH) in providing GIS services relating to the availability of water and wastewater networks and encourages Louth County Council to use this for future planning.



Any new developments connecting to the water network must be assessed through the connections and developer service to determine individual requirements. This would include potential altering and diversion of existing infrastructure to ensure continuity of the water service during development.

Public realm and road projects also likely have an effect on Uisce Éireann's infrastructure, and so early engagement would be necessary to avoid unnecessary damage.

Chief Executive Opinion on Issues raised:

The availability of high-quality water and wastewater networks are critical in securing investment, creating sustainable and attractive places, ensuring the health and wellbeing of the community, and safeguarding the environment.

The commitment from Uisce Éireann to the implementation of the National Planning Framework and Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy is welcome. This demonstrates a co-ordinated approach in planning policy and infrastructure investment thereby ensuring the future growth of settlements will be plan led.

The Chief Executive notes the updates to the strategic funding plan for Uisce Éireann, and the various other plans in which the body has to abide by and will review policies in the Louth County Development Plan to ensure that projects to improve the water service in Louth can go ahead.

There are various locations in Louth where the water and wastewater infrastructure is experiencing significant pressure. The Council are continuing to engage proactively with Uisce Éireann in progressing infrastructure projects throughout the County to enable the County and in particular the Regional Growth Centres of Dundalk and Drogheda to continue to expand their population and employment base. It is fundamental that infrastructure deficiencies do not negatively impact on economic investment in Dundalk or Drogheda as this will undermine the growth strategy.

The Forward Planning Team will utilise the various tools to help identify Uisce Éireann's services as well as the identification of water sources and catchments and would be looking to use these to inform plans and will continue to work with Uisce Éireann in identifying any potential infrastructure constraints the land use zoning element of the plan making process.

Public realm policy would also review the provision of green-blue infrastructure and Sustainable Urban Drainage Systems (SUDS) and how these can help Uisce Éireann meet its objectives.

The LCDP 2027-2033 will also highlight the requirement for the progression and delivery of critical water services which will also help enable the release of new lands for developments as part of Louth County Council's growth targets.

Chief Executive Recommendation:

To continue to engage with Uisce Éireann in progressing and delivering water services infrastructure throughout the County to enable population and economic growth in the short, medium, and long term and to include the associated policy support for these projects and the delivery of sustainable water services infrastructure in the Draft Plan.



Submission Ref. No:

LH-C144-DPIP-45

Submitted By:

Department of Education and Youth

Summary of Main Issues Raised:

Opportunity to engage welcomed. Collaborative approach required to support provision of additional and enhanced educational facilities.

The Department will work with Louth County Council to make sufficient provision for future education requirements over c.10-year horizon. In existing developed areas, the Department will seek to protect the long-term educational requirements to support sustainable communities.

Population targets for Regional Growth Centres have been provided. When projections for remaining settlements become available these will be analysed to identify potential additional school and other education accommodation requirements. An opportunity to engage with the Council early in the drafting stage would be welcomed.

The following observations are made:

- The new plan should be explicit in its support for the provision of school accommodation.
- The new plan should include policy objectives on both the provision of new schools and the protection of existing schools and supporting infrastructure/amenities.
- It is anticipated that additional Special Education Needs (SEN) provision at both Primary and Post Primary level will be required. Extensions to existing schools may be required. Plan should be explicit in its support for SEN.
- Request that the community zoning is used for education facilities.
- Request that there is explicit provision for school development to meet that projected population growth in existing 'built-up' areas, throughout the County.
- Provision of buffer zones/ land use designations that support education development adjacent to existing and established schools particularly in built up areas or if there is an immediate need due to unforeseen circumstances.
- Support for urban design schools as per Department Guidelines would be welcomed.
- School sites required by the Department should be supported in terms of zoning or a Specific Local Objective.
- Site already identified by the Department to meet immediate school place requirements should be supported in terms of zoning or a Specific Local Objective.
- Request that Louth County Council actively facilitate principle of permitting temporary and permanent schools in as many zones as possible.
- The Department of Education and Youth's current Technical Guidance Documents on school site identification and suitability assessment can be used to inform the selection of proposed school sites and are available on: www.education.ie
- Schools and associated enabling infrastructure should be placed at the heart of new and expanding communities.
- Community facilities and schools should be close to allow maximum benefit to the community.
- Enabling infrastructure should be provided in advance of advance of school facilities.
- Requests that all existing schools are zoned and mapped on the Council's GIS system.
-



Chief Executive Opinion on Issues raised:

The observations and comments by the Department of Education and Youth are noted and welcomed, and the Council will continue to engage with the Department in relation to school provision throughout the County. The importance of providing for those with Special Educational Needs is fully acknowledged and the new plan will provide specific Policy Objectives which continue to support the development of new education facilities and improvement/ expansion of existing facilities for all.

The Chief Executive would acknowledge that in some instances it may be more efficient and cost effective to extend an existing school rather than build a new facility, an examination of all zonings including those adjacent to existing schools shall be undertaken as part of the development plan review.

The information contained on the Department of Education website will be considered when examining sites which may be suitable for schools. If a suitable site for a school or a suitable location for the extension of an existing school is identified, the site shall be zoned appropriately and/ or a spot objective shall be provided.

In the current County Development Plan the Land Use Zoning categories are outlined along with the uses which are 'generally permitted' and 'open for consideration'. There is also a section on 'Use Not Listed', which recognises that there may be scenarios where there are proposals for uses not included in the list. This allows flexibility and enables proposals to be considered on their own merits subject; it is anticipated that this approach will continue in the new Plan.

Likewise, the importance of synergy between similar uses such as community and education facilities in assisting with the creation of sustainable neighbourhoods is acknowledged and the new plan will support the agglomeration of such facilities where possible.

The Council will investigate the possibility of plotting/ mapping all schools however this would be subject to the availability of resources.

Chief Executive Recommendation:

To continue to work in collaboration with the Department of Education and Youth to identify suitable location of schools/extension of schools.

To continue to provide policy objectives, land use zonings and spot objectives which support provision of new and extension of existing schools for all.

To encourage the co-location of community facilities.

To have regard to the documentation on the Department of Education and Youth's website when drafting the new Plan.

Submission Ref. No:

LH-C144-DPIP-47

Submitted By:

The Land Development Agency (LDA)

Summary of Main Issues Raised:

The LDA is a commercial state sponsored body set up by government with two main functions:

- Coordinating appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery.



- Driving strategic land assembly, working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilising land values and delivering increased affordability.

The Land Development Agency Act 2021 represents a landmark advancement in the strategic identification and utilisation of public lands to meet Ireland's long-term housing and affordability objectives. It is therefore essential that the role and statutory mandate of the LDA is embedded within the CDP through the inclusion of LDA specific objectives and actions.

Growth Strategy

The LDA is committed to compact growth and brownfield regeneration, consistent with national and regional policy objectives. Our remit is to progress the regeneration of large-scale, strategic sites to increase housing supply, particularly affordable and social housing. Delivering Homes, Building Communities 2025-2030 reinforces this mandate and sets out an expanded role for the Agency. The LDA is one of Ireland's largest housing producers, delivering major infill and large-scale settlements on State and market acquired lands in partnership with local authorities. Under the Strategy, the LDA will operate across a wider area, acquire additional lands, invest in enabling infrastructure, and play a central role in the Starter Homes Programme while supporting SME developer's and delivering all tenures.

Government has committed a further €2.5 billion in equity funding, bringing the LDAs capital base to €8.75 billion. The LDA will extend this funding by sourcing external finance to support its objectives.

The draft Development Plan should ensure its policies and objectives explicitly support and enable large scale regenerative projects which deliver housing within existing urban centres, recognising their strategic importance to achieving sustainable urban consolidation and housing supply targets.

The Relevant Public Lands 2025 report published March 2025 identifies 4 parcels of land within the County that have the potential to deliver 1000-1400 homes. The report can be viewed via <https://lda.ie/public-lands/report-on-relevant-lands>

Given the potential to deliver new affordable and social homes within Louth, the following specific objectives is recommended-

'To support and collaborate with the Land Development Agency in the identification, assembly, and development of appropriate lands, including State lands, for the delivery of housing and mixed-use development, in accordance with the principles of compact growth, regeneration, and sustainable development'

Cost Rental Housing

The LDA is committed to the delivery of high quality affordable and social housing at scale. Cost Rental represents a new and sustainable form of tenure, established under the Affordable Housing Act 2021.

Cost rental and affordable for sale housing provides secure, long term and affordable rental accommodation for individuals and middle incomes who are above the eligibility threshold for social housing but face challenges in accessing home ownership or private rental accommodation. Under this model, rents are based on the actual cost of construction, management, and maintenance, rather than market rates, ensuring long-term affordability and stability for tenants.

The LDA recommends that the Cost Rental tenure be explicitly recognised and supported within the housing policies and objectives in the Draft CDP, ensuring it is embedded as a viable and sustainable housing option within the County's tenure mix.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the need for compact, sustainable settlements which serve the current and



future needs of residents. The Draft Plan will include policy objectives which support and enable large scale regenerative projects that deliver housing within existing urban centres, recognising their strategic importance to achieving sustainable urban consolidation and housing supply targets.

The Report on Relevant Public Lands 2025, which identifies 4 parcels of land suitable for large scale housing within County Louth, will be considered in the preparation of the Draft Plan.

Another permeating principle of Draft Plan will be the provision of social and affordable housing for all. The Low-Cost Rental model of housing was introduced under the Affordable Housing Act 2021 and will be supported in the Draft Plan.

Chief Executive Recommendation:

Incorporate relevant narrative, policy objectives, and land zonings within the Draft Plan which support the LDA’s role in the identification and utilisation of public lands to meet long-term housing and affordability objectives.

Submission Ref. No:

LH-C144-DPIP-49

Submitted By:

Maureen Lowe

Summary of Main Issues Raised:

The submission sets out two specific concerns:

Grandfather provision for pre-existing landowners

The submission requests consideration for a specific provision to recognise individuals who owned land prior to the implementation of the current plan regardless of the extent of land owned.

Under the current plan, individuals who emigrated temporarily (despite intending on returning to the county and build on their own land) are excluded from eligibility and which renders the investment in the land without value and prevents them from building on their site.

Request that the plan includes a grandfather clause granting eligibility to all persons who owned their land before the plan’s enactment, including those living abroad but who had a clear intent to return and retain their property rights.

Site-Specific Environmental and Landscape Assessments

Planning decisions relying on environmental, landscape or visual amenity impacts should be grounded in site-specific assessments rather than assumptions or generalised criteria.

E.g. A recent application was refused on the basis that *‘the removal of a significant amount of hedgerow to provide sightline visibility’* would be contrary to Policy Objectives ENV 38 and 39 of the LCDP. The submission sets out that a proper on-site survey would have established that the feature described as a ‘hedgerow’ was overgrown briars, tree stump and weeds which detract from the rural character of the area.

Evidence-based, site-specific surveys should be required before refusing applications to ensure they accurately reflect on site conditions, support fairness and maintain the integrity of environmental policy application.

Chief Executive Opinion on Issues raised:

The Draft Plan will review all policies in relation to growth both within the existing settlements and in the rural



area. The qualifying criteria for rural housing policy will be reviewed having regard to national and regional policy and guidelines.

In relation to the assessment of planning applications, land ownership does not guarantee a grant of permission. Applications are assessed on their merits through the Development Management process having regard to the planning policy and guidelines in place at the time of the application not at the time of purchase of lands.

The Chief Executive recognises the importance of biodiversity including protecting trees and hedgerows, and the Draft Plan will review existing policies relating to the protection and retaining of existing trees and hedgerows. The assessment of planning applications is a Development Management matter however applicants can include a survey or ecological assessment as part of the application documentation to support proposals if the applicant wishes.

Chief Executive Recommendation:

To review policies and objectives relating to the qualifying criteria for one-off rural housing in accordance with national and regional guidance.

To review policy objectives and guidance in relation to biodiversity and protection of trees and hedgerows.

Submission Ref. No:

LH-C144-DPIP-53

Submitted By:

Gareth Kyne on behalf of Boyne Valley Consultative Committee

Summary of Main Issues Raised:

Ways to connect significant amenities (Brú na Bóinne, Dowth Hall Estate, Oldbridge Estate etc) should be examined. Amenities within the Boyne Valley are unmatched. The greenway from the Ramparts to Oldbridge is well used. Oldbridge has a major historical and cultural significance. The Dowth Hall estate has become a significant environmental oasis and could be opened to pedestrians and cyclists creating an unparalleled public space. Add Brú na Bóinne into the mix and the potential for green tourism business and services is unprecedented.

Boyne Greenway should be extended linking Drogheda to Slane via Newgrange and Knowth, this would be a highly attractive tourist offering. The submission provides details regarding potential routes. Drogheda would be at the heart of sustainable tourism offering. It would be a scandal if this opportunity was lost.

Chief Executive Opinion on Issues raised:

The Draft Plan will continue to support the enhancement and development of Drogheda’s rich and varied heritage and cultural assets including the development of ‘Boyne Greenway’ and other recreational facilities which promote the development of cultural tourist facilities and link the town centre with outlying areas

Chief Executive Recommendation:

Continue to provide policy objectives in the Draft Plan which promote cultural tourism and greenways.



Submission Ref. No:

LH-C144-DPIP-55

Submitted By:

RMLA Planning Consultants on behalf of An Post

Summary of Main Issues Raised:

Business outlined: An Post eCommerce and An Post Customer. Details regarding staff, customer and fleet provided.

Operational Requirements may involve:

- Expanding or consolidating existing facilities.
- Redeveloping or replacing outdated premises.
- Acquiring adjoining lands or relocating to more suitable sites; and
- Integrating sustainability measures, including EV charging infrastructure, energy-efficient building design, and low-emission fleet operations.

Submission requests that the new County Development Plan contains several supportive policies:

- To support An Post in the provision, expansion and modernisation of postal and parcel facilities to ensure the continued delivery of a reliable and efficient postal service.
- To facilitate the provision of postal infrastructure at suitable locations throughout the County in accordance with the settlement hierarchy and sustainable transport principles.
- To promote the integration of appropriate postal facilities, including both post offices and processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement.
- To recognise the specific operational requirements of postal and delivery facilities, including the need for adequate access, parking, and operational space for fleet vehicles, while supporting the transition to low- and zero-emission transport.

Car Parking

Details are provided regarding An Post's car parking requirements. It is requested that the Car parking standards for An Post only apply to staff and visitor parking and exclude operational vehicle storage used in the direct delivery of postal services.

Access & Delivery Requirements

Access and delivery are outlined and the submission requests that operational factors should be recognised having regard to the critical service role provided by An Post.

Engagement with An Post

Request that Louth County Council engage directly with An Post.

Chief Executive Opinion on Issues raised:

The Chief Executive notes the concerns in relation to the operational requirements of An Post. The Draft Plan will continue to provide a range of policy objectives which support new and expansion of existing businesses. A review of car parking standards will be conducted in the preparation of the new County Development Plan.



Chief Executive Recommendation:

To continue to provide policy objectives in the Draft Plan which support new businesses and expansion of existing businesses.

To carry out a review of car-parking standards.

Submission Ref. No:

LH-C144-DPIP-56

Submitted By:

Drogheda and District Chamber

Summary of Main Issues Raised:

Introduction

Details regarding the Chamber are provided. The Chamber is keen to add voice to the future development of Louth, and the focus of submission will mainly be Drogheda.

Transport Strategy

Objective: To make the most of Drogheda's location. Focus areas: Ingress and egress of the town and promotion of rail and park and ride facilities.

Enhance Public Transport Networks.

- Request that a report be prepared in 2026 to look at the key impacts of the Donore Road toll. The results should form the basis for a dedicated objective within the next CDP.
- Completion of the Northern Cross Route, providing direct access from the M1 to Drogheda Port at Tom Roe's Point, this would allow for significant development from a housing target and job creation stance. Consideration needs to be given on how to encourage haulage companies to use it.
- End heavy vehicles using Drogheda's streets. Create a working group with various bodies to look at improving the lives and mental health of those impacted by long delays in the urban parts of the town at key times and junctions
- Arrival of Dart must be monitored, including car parking and traffic flow to MacBride Station because of enhanced services.

Sustainable Solutions

Drogheda North Station is required to cater for the future population of more than 20,000 persons. It should be driven as a Transport Hub for the Northeast (THNE) serving as a train station for Dublin- Belfast users, hub for bus and coach services providing park and ride and shuttle bus facilities, and EV charging. Opportunity to drive growth from the hinterland of Dublin to Drogheda must be explored as part of the CDP, lessening the need for commuting and assisting with SDGs consequently. Support and guidance from the Eastern and Midland Regional Assembly should be explored.

Key future gain projects

- Invest in road upgrades.
- Implement Smart Traffic Management Systems.
- Ensure Co-operation with Meath County Council remains strong.
- Continued investment in digital connectivity to support remote working and reduce the need for long



commutes.

Retail Strategy

Objective to promote and drive sustainable and diverse retail growth ensuring that the County and Drogheda as a whole, remains a vibrant destination for shopping, leisure, and community activities. *Focus Areas:* Adding footfall to the main streets while being cognisant of role of out-of- town retail, how they can support one another.

Key Proposals

Town Centre Revitalisation

Introduction of and constant updating of a new 10-year 'Town Centre Retail and Development Strategy' including a five-year strategic plan and yearly action plans. Areas must become more attractive for foot traffic, with public spaces, green areas, improved transport links and proper lighting. Incentives for smaller local shops. Retail locations must be vibrant throughout the day and night. Introduction of tax incentives/ town centre loyalty card.

Future-Proofing Retail Infrastructure

Focus on digital transformation for retailers, develop flexible and accessible retail spaces, promote and reward eco-friendly retail practices.

Joint Local Area Plan (Urban Area Plan)

Drogheda and District Chamber made a submission to the Issues Paper of the Drogheda Joint LAP, the objectives outlined remain relevant:

- Complete PANCR by 2028, establishing a Special Economic Zone, create a new train station on the north side.
- Promote tourism; provide designated bus parking and create safe pedestrian routes to surrounding attractions.
- Create a third level campus and focus on higher education.
- Study of plan area needed to cater for growing teenage population.
- Continue the work of the Drogheda Implementation Board.
- Dedicated plan from IDA Ireland to identify new economic land zones.

The Joint LAP states that submissions made to the issues paper will form part of the evidence base for the Louth and Meath County Development Plans as they relate to Drogheda (Section 1.2).

Key Sustainable Objectives

- Drogheda and District Chamber is delighted to be part of the East Coast offshore Wind group.
- Appropriate sporting and recreational facilities must be fast tracked including a designated sports arena.
- A new Third Level institution is required for the town of Drogheda to enable sustainable education. This should be explored by means of a special committee.

Conclusion

Drogheda's position needs to be considered by both Louth and Meath County Councils. There should be private and public collaboration. The Chamber is willing to collaborate with local authorities, developers, and communities to help realize these projects.



Chief Executive Opinion on Issues raised:

Transport Strategy

A Local Transport Plan (LTP) is currently being prepared for the town. This will seek to promote more sustainable modes of travel including walking, cycling, and public transport. A list of potential projects that would make active travel or public transport a more attractive or viable alternative to the car will be included in the LTP. It will also provide a policy framework for transport related developments in the town including the potential requirement for a Train Station in the north Drogheda area.

The Port Access Northern Cross Route (PANCR) is an arterial road that will provide a direct link between Drogheda Port and the M1 Motorway. It is a critical piece of enabling infrastructure that will have the dual benefit of releasing lands in north Drogheda for development, whilst also removing HGVs and port related traffic from the town centre. The Council is actively working with statutory bodies and stakeholders in efforts to complete the next stage of the PANCR.

Retail Strategy

The new County Development Plan will promote the 'Town Centre First' principles to ensure that Drogheda functions as viable, vibrant and attractive location for people to live, work and visit, while also functioning as the service, social, cultural and recreational hub for the local community. As part of the preparation of the Plan a Retail Strategy will be prepared which will identify the potential additional floorspace requirement for retail development.

Joint Local Area Plan (Urban Area Plan)

- The submission by Drogheda Chamber to the Issues Paper for the Joint Drogheda Local Area Plan will be considered in the preparation of the Draft County Development Plan.
- As per Part 1 of the CE's response a Local Transport Plan is currently being prepared which will provide a policy framework for transport related developments in the Drogheda.
- The draft Plan will recognise all the tourist assets of the town and will seek to promote them alongside Fáilte Ireland's designation of Drogheda as a 'destination town' and the gateway to the Boyne Valley.
- The contents of the submission regarding education are noted. The new Plan will recognise the importance of lifelong learning and the provision of education facilities in meeting the needs of the current and future population and will support the provision of such facilities in appropriate locations in the town.
- The narrative and policy objectives in the new Plan will support inclusiveness for all including teenagers.
- Support for Drogheda Implementation Board is noted.
- As part of the preparation of the new County Plan a review of all existing employment and related zonings will be carried out. This review will take account of the potential uses that could be considered for the development of enterprise and provision of job opportunities.

Key Sustainable Objectives

- Support for the East Coast offshore Wind group is noted.
- The new Plan will support the provision of additional sports and recreation facilities where a need has been identified this will be informed by any Recreation Strategy produced by Louth County Council.
- The new Plan will recognise the importance of lifelong learning and the provision of education facilities in meeting the needs of the current and future population and will support the provision of such facilities in appropriate locations in the town.



Conclusion

Louth and Meath County Council will continue to work in collaboration particularly regarding the development of Drogheda. The Chamber's comment in relation to working in partnership with various bodies is welcomed.

Chief Executive Recommendation:

To recognise the growth, opportunities, challenges, and potential of Drogheda in the Draft Plan and to include policy support that will enable the town to fulfil its potential as a Regional Growth Centre as recognised in national and regional policy.

To include policy support for the implementation of the Local Transport Plan for Drogheda in the Draft Plan.

To continue to provide for Policy Objectives and associated narrative text which support the concept of 'Town Centre First' and to complete a retail strategy for the County.

Provide Policy Objectives which support tourism and Drogheda as a 'destination town', the gateway to the Boyne Valley.

Provide Policy Objectives which promote inclusivity for all including teenagers.

To carry out a view of all land uses including those related to employment.

To provide Policy Objectives which support the provision of additional sports and recreation facilities, where a need has been identified

Support the importance of lifelong learning and provide Policy Objectives which support the provision of education facilities for all.

Submission Ref. No:

LH-C144-DPIP-58

Submitted By:

Liam Kieran

Summary of Main Issues Raised:

Economic Development

70% of employment is usually service based. Expansion of highly skilled and highly paid employment promotes employment for all.

Obtaining University status for DKIT and enabling it to train craft workers is viable. Louth Hospital can provide jobs at all levels. First class medical and hospital facilities will attract industry. Frequency of trains to Dublin should double. A 3-storey carpark should be provided at the train station. A shuttle service between bus and train station should run every 15 minutes. Roads should be one way; this would generate space for bus and cycle lanes. Effective educational, medical and transport infrastructure will attract companies. Examples of other cities provided.

Housing Delivery

Grant for shop owners to convert to residential, examples of Dutch and Italian apartment blocks provided. Houses should be smaller, terraced south facing and insulated. Houses could be 3 storeys with self-contained flat on ground floor and used for a variety of people. Houses built on flood plains should follow Nardonne



design.

Control Areas

Only buildings worth preserving should be preserved and control should be based on consultation.

Climate Action

Houses should be fully insulated against the cold. Bus services should be fully comprehensive; bus stops should have seats and be sheltered. Residential areas should be linked to places of work, education and services. Charging points for electric cars should be standardised. Car ownership should be restricted to those who have a space (Sapparo, Japan). Reduce car size. Aim to make a third of Dundalk green (Hamburg), have small parks within a 10-minute walk, Berlin example provided. Introduce change gradually. Invest in sewage and water infrastructure. Ensure villages have equal bus services. Replace septic tanks with public owner sewage systems gradually.

Ensure Dundalk is somewhere worth visiting and living (Stockholm). Offer cultural facilities and range of indoor recreational facilities (list provided) and establish various museums (list provided).

Rural Louth

Link towns and villages with public footpaths. Develop riverside walks. Build bird hides. Establish heritage centres. Arrange tours of archaeological sites. Ensure Louth becomes a centre for active and cultural tourism. Link Drogheda to Dundalk/Cooley Greenway.

Chief Executive Opinion on Issues raised:

The new Plan will provide an economic profile of the County. It will continue to support and encourage economic development and investment as well as ensuring that Louth's settlements are attractive places to live, work, invest and visit. The Local Transport Plans for Drogheda and Dundalk will inform the new Plan and assist in identifying traffic management solutions and promote active travel modes.

The new Plan will support compact growth by prioritising housing delivery in the built-up area and will encourage the conversion of buildings to residential use where appropriate.

A review of the Record of Protected Structures will be carried out as part of the development plan process.

Climate action shall continue to permeate all aspects of the new Plan. The new Plan will contain a suite of measures which protect Louth's natural heritage and supports its 'greening'. It will promote the concept of a '10-minute neighbourhood' to assist in the creation of a sustainable community. Provision of bus infrastructure, increase in bus services and standardisation of electric chargers falls beyond the remit of the Plan.

The policy objectives in the Plan shall support investment infrastructure in accordance with national guidance. The new Plan will also provide policy objectives which support the provision of additional cultural and recreation activities subject to normal planning criteria

The new Plan will continue to promote the development of greenways to improve connectivity, promote active travel and encourage tourism

Chief Executive Recommendation:

To continue to support economic development in the Draft Plan and make Louth an attractive place to live, visit and invest.

Local Transport Plan will inform policy objectives in relation to active travel and sustainable transport modes.

To support regeneration measures in the Draft Plan, promote the concept of a '10-minute neighbourhood' and



encourage delivery of housing in 'built up' areas.

To carry out a Review of the Record of Protected Structures as part of the preparation of the Draft Plan.

To provide a chapter on Climate Action and ensure that climate action measures permeate the entire plan.

Provide policy objectives in relation to protection and enhancement of natural heritage, support for greenways and development of tourism throughout the County.

Submission Ref. No:

LH-C144-DPIP-59

Submitted By:

Newry, Mourne and Down District Council

Summary of Main Issues Raised:

As an adjoining local authority, Newry, Mourne and Down District Council (NMDDC) welcomes the opportunity to comment.

Under the topic of employment and economic development Louth's strategic location along the Dublin-Belfast Economic Corridor is noted as being a contributing factor in making the County an attractive location for economic investment. NMDDC consider that there is opportunity to make reference to the potential this offers for collaboration and growth between both Counties given their strategic locations.

NMDDC acknowledges the working partnership with Louth County Council on strategic projects such as the Newry-Omeath Greenway and the ongoing Narrow Water Bridge, and the need to improve and promote sustainable transport.

The target to reduce greenhouse gas emissions by 2030 and the challenge this poses for infrastructure is set out. There is an acknowledgement that it is important to strike a balance between the need for renewable projects and the concerns of the community on which they impact. NMDDC would welcome further dialogue on this issue given the number of cross-boundary designated sites including those at Carlingford Lough (Ramsar, Special Protection Area, Special Area of Conservation, Area of Special Scientific Interest and Marine Conservation Zone).

NMDDC supports the recognition of the fundamental role land use and spatial planning has to play in reducing our carbon footprint. It is noted that the principal risks from climate change to Louth are coastal and river flooding, and coastal erosion with impacts also likely from periods of drought. Given our Council's shared boundary and coastline of Carlingford Lough NMDDC welcomes the assertion that the County Development Plan will support climate action and mitigation measures to assist in adaptation and resilience to the effects of climate change in addition to incorporating the Vision, Objectives and Actions of the County Climate Action Plan.

Chief Executive Opinion on Issues raised:

The Chief Executive acknowledges the strong working relationship with Newry, Mourne and Down District Council. The joint partnership in strategic projects such as the ongoing Narrow Water Bridge development and the recently completed Newry-Omeath Greenway demonstrates effective, cross-border delivery of infrastructure and an integrated approach to land use. These projects are not only creating physical links, but opening up social, economic and community benefits. This is underpinned by our Memorandum of Understanding (MOU) which commits our counties to increased cross-border co-operation and seeks to support and promote the economic development and competitiveness of the region.

The above comments have been noted and will be incorporated into the Draft Plan, with opportunity for the Council to provide further comment at the Draft Plan consultation stage.

Chief Executive Recommendation:

Include relevant narrative and policy objectives in the Draft Plan regarding cross-border working relationship with NMDCC in relation to social, economic and environmental matters.

Submission Ref. No:

LH-C144-DPIP-60

Submitted By:

Vincent O'Connor

Map showing land subject to Submission:

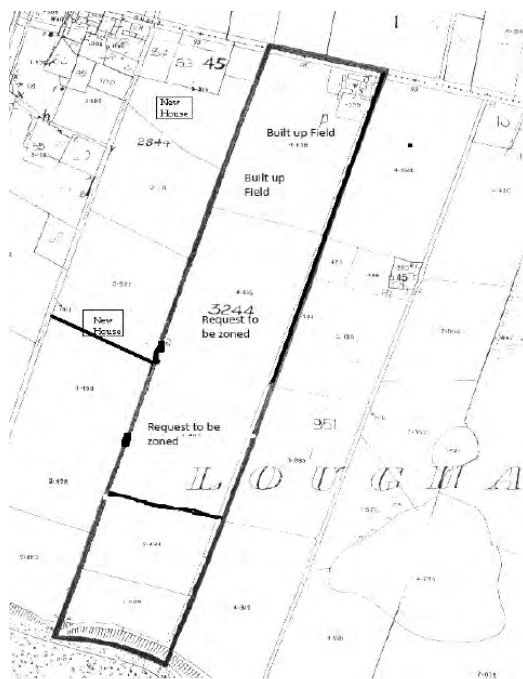


Figure 1: Map included as part of submission.



Figure 2: Google Maps extract illustrating the existing settlement boundary of Lordship as per the LCDP 2021-2027 (outlined in red) and the extent of lands owned by the submitted (outlined in yellow).



Figure 3: Google maps extract illustrating the lands subject of the rezoning request (2no. fields outlined in yellow) as per the detail of the submission.

Summary of Main Issues Raised:

The submission seeks the extension of the settlement boundary of Lordship to the south to include the two fields outlined in yellow in Figure 3 above.

The submission sets out the following rationale:

- The lands are within the natural boundary of Lordship and are in close proximity to the centre of the settlement and fall within the speed limit.
- There are existing dwellings built on lands immediately adjacent to the submission lands.
- The natural balance of housing in Lordship would indicate that growth towards Carlingford and the sea should take place to counterweight any growth towards Dundalk and reduce ribbon development on the Dundalk side of the settlement.
- The current CDP has not solved the housing crisis, and the extended settlement boundary would allow the release of lands for housing.
- Extending the settlement boundary as per Figure 3 would support national and local goals for sustainable housing by identifying areas where compact, good-quality growth can take place.
- Development of the subject lands can easily connect to current roads, water services, footpaths and public transport.

Chief Executive Opinion on Issues raised:

The lands subject of this submission is currently outside of the settlement boundary of Lordship as shown in Figure 2 and 3 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and



the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of these lands at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-61

Submitted By:

Oriel Windfarm Limited

Summary of Main Issues Raised:

Oriel Windfarm Limited (Oriel) is a privately owned Irish renewable energy company. It is the developer of the proposed Oriel Offshore Windfarm Project, which is to be located in the Irish Sea off the coast of County Louth. The project will, subject to consent, supply clean renewable energy for over 300,000 homes and can reduce Ireland’s carbon emissions by 600,000 tonnes annually. It will deliver significant economic and environmental benefit both locally and nationally.

In October 2017, Parkwind NV, a European offshore wind farm developer agreed a significant investment to become a strategic partner in Oriel. In January 2019, ESB also stepped into the Project, creating a strong partnership with the operational experience and financial backing required to deliver a project of this type.

Oriel holds a Maritime Area Consent for a site off County Louth and in May 2024 submitted an application for 25 offshore wind turbines and associated infrastructure. The application is currently under consideration by An Coimisiún Pleanála.

Climate Action and Energy

Oriel strongly endorses the retention of existing policies for the transition to a low carbon and climate resilient County. Oriel supports increased generation of use of renewable energy through the development of the indigenous energy resources of the County.

Infrastructure and Utilities

Oriel supports the retention of renewable energy policies set out in the current CDP on Infrastructure and Utilities, and particularly the support for the development of offshore windfarms subject to normal planning considerations.

Louth, through its coastal location, has an important role in the development of offshore renewable energy and can gain significant benefit from its delivery. Oriel supports the reinforcement and development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the County and Region. This will include the delivery of the necessary integration of transmission network requirements facilitating linkages of renewable energy proposals to the electricity and gas transmission grid, in a sustainable and timely manner, subject to appropriate environmental assessment and the planning process.



The future CDP should give recognition to the critical importance of the electricity transmission network in the delivery of Ireland's renewable energy targets and the need for modernisation and transformation of this system.

Economic Development and Employment

The experience elsewhere is that the location of a coastal offshore windfarm brings a significant economic and employment boost to coastal communities not only through long-term direct employment by the wind farm but also through the development of marine support businesses within the region, improvement to existing port facilities, operations and maintenance bases and as an anchor for a clean tech hub to promote other sustainable enterprises within the region. Offshore wind will also bring community benefit through the requirements of government led Renewable Energy Support Scheme and through direct funding to the fishing industry.

Chief Executive Opinion on Issues raised:

Louth's strategic position along the coast provides significant opportunity for the utilisation of the sea for offshore wind farms. As per European, national and regional policy, Louth County Council is committed to reducing greenhouse gas emissions in line with Statutory targets and facilitating the shift from fossil fuel energy production to renewable energy production. Nationally, 80% of electricity generated must be via renewable sources by 2030. CAP25 sets an offshore wind target of 5GW by 2030. This is supported by NPO 55 of the NPF, which supports the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore and offshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.

The Draft Plan will include policy objectives, narrative, and land use zonings which align with European, national and regional policy and encourage and facilitate renewable energy sources, including offshore wind farms, in order to meet statutory obligations and facilitate a smooth transition to renewable energy generating forms. The need for associated supporting infrastructure will also be recognised.

Further information in relation to Offshore Wind energy can be read overleaf in Submission Ref No.62-Department of Climate, Energy and the Environment.

Chief Executive Recommendation:

Include relevant policy objectives, land use designations, and narrative in relation to renewable energy generating developments in the Draft Plan, and in particular offshore wind farms, and associated supporting infrastructure.

Submission Ref. No:

LH-C144-DPIP-62

Submitted By:

Department of Climate, Energy and the Environment
(DCEE)

Summary of Main Issues Raised:

The Department of Climate, Energy and the Environment's (DCEE) role is to support the Government realising its long-term objective of creating a climate neutral Ireland, powered by clean energy, where our environment, society and economy thrive, by working together to deliver climate action; the transformation of our energy



systems; the protection and resilience of our environment and a resource-efficient economy. This vision aligns with the UN 2030 Agenda for Sustainable Development and the 17 SDGs.

The Government is committed to achieving climate neutrality no later than 2050 with a 51% reduction in GHG emissions by 2030, a legally binding objective as set out in the Climate Action and Low Carbon Development (Amendment) Act 2021 (the Climate Act). The Act supports Ireland's transition to net-zero and the achievement of a climate neutral economy no later than 2050 and establishes a legally binding framework with clear targets and commitments.

The Department asks that the following material outlined is considered when drafting the Development Plan.

Climate Action

The Department notes Section 15(1) of the Climate Act 2021 which requires public bodies to perform its functions in a manner consistent with most up to date climate action materials. The Climate Action Plan 2025 (CAP25) lays out a roadmap of actions to meet our national climate objective of pursuing and achieving the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. We request this material is incorporated into the development plan, alongside the following additional material: Long-term Strategy on Greenhouse Gas Emissions Reductions; Ireland's National Climate Objective; National Planning Framework; European Climate Law; National Adaptation Framework; The National Climate Change Risk Assessment; Agenda 2030; Sustainable Development Goals; consult with their Climate Action Teams; consult directly with their own Climate Action Regional Offices.

Recommendation 1: The Plan should support the implementation of the national Climate Action Plan, the Long-term Strategy on Greenhouse Gas Emissions Reductions, the National Climate Objective, the National Adaptation Framework, NPO 69 of the revised NPF and the UN Agenda 2030 and the Sustainable Development Goals through the preparation of effective objectives and actions for climate action in Development Plan area.

Recommendation 2: The Department recommends that an objective is included in the Development Plan to support the implementation of CAP25 (and revisions).

Local Authority Climate Action Plan

The Louth County Council Climate Action Plan 2024-2029 (LACAP) was adopted in February 2024, which the development plan must take account of. Plans shall include objectives for the promotion of sustainable settlement and transport strategies including the promotion of measures to reduce emissions and address climate adaptation, taking account of any LACAP. The Decarbonising Zone shall also be included with appropriately reflected objectives.

Recommendation 3: The Department recommends that the Plan include objectives and/or policies to ensure the implementation of the Louth County Council LACAP, DZ priority areas and related actions, thereby ensuring consistency and alignment between both Plans.

Renewable Energy

Ireland's National Development Plan (NDP) 2025 and Climate Action Plan 2025 (CAP25) set ambitious renewable energy targets, aiming for 80% of electricity from renewable sources by 2030 and a 43% share of renewables in total energy consumption, in line with EU RED III obligations. Local Authorities must align Development Plans with these goals, incorporating national targets such as 8GW solar PV, 9GW onshore wind, and 500MW community-based projects, alongside increased micro-generation. Delivery will be supported by schemes like Renewable Electricity Support Scheme (RESS), the Small-Scale Renewable Electricity Support Scheme (SRESS) and the Micro-Generation Support Scheme (MSS). The revised National Planning Framework allocates regional renewable capacity, which will inform Regional Spatial and Economic Strategies (RSES) and county-level plans. To assist implementation, the Department and SEAI are updating the Local Authority Renewable Energy Strategies (LARES) methodology to provide best practice for identifying and assessing renewable resources



locally.

Recommendation 4: The Department recommends that the Local Authority prepare a Renewable Energy Strategy as part of the Development Plan, having regard to the Regional Renewable Energy Strategy (RRES) and the revised methodology for LARES (when published).

Recommendation 5: The Department recommends the inclusion of an objective of the Council in the Development Plan to promote the development of renewable energy installations, and to support the development of additional supporting grid infrastructure. It is crucial that all future development seek to increase their contribution to the national renewable electricity generation target and, where possible, aim for developments that are carbon or energy use neutral. Also consider targets set out in Agenda 2030 regarding SDG7.

Recommendation 6: Inclusion of a specific objective to promote the repowering and extension of the lifetime of existing wind power installations and to enhance the development of additional renewable energy infrastructure in the County, including solar as well as supporting grid infrastructure.

Marine Planning

Through effective coordination and alignment of marine and land planning, a comprehensive planning framework for development that has land sea interactions will be created. The Development Plan should be consistent with the policies and objectives of the National Marine Planning Framework (NMPF) which supports the implementation of Designated Maritime Areas Plans (DMAPs), including for Offshore Renewable Energy (ORE).

Recommendation 7: It is recommended that the Development Plan include a policy to facilitate land sea interactions and support sustainable marine related development in appropriate locations.

Offshore Renewable Energy (ORE)

The development of ORE is required over the coming decade to meet the ambitious goal of 80% renewable electricity by 2030 and the CAP25 offshore wind target of 5GW by 2030. Any policies within the Development Plan should not undermine the policies and objectives of the: NPO 55 of the NPF, Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System, Future Framework for Offshore Renewable Energy, Powering Prosperity – Ireland's Offshore Wind Industrial Strategy, The South Coast Designated Maritime Area Plan for Offshore Renewable Energy.

The Department has commenced work on the National Designated Maritime Area Plan for Offshore Renewable Energy, which will provide a spatial planning policy framework for ORE, including spatial designations.

Local authorities should support education, training, and research initiatives that drive innovation and skills development for the growth of the ORE sector. They should promote the co-existence of ORE projects with other marine activities while safeguarding and where possible enhancing marine biodiversity.

Recommendation 8: Any policies within the Development Plan should not undermine the objective of the various plans and frameworks related to ORE.

Recommendation 9: The Department recommends that the Development Plan should include reference to:

- Shaping Our Electricity Future 1.1, EirGrid's updated roadmap for the development of the transmission grid out to 2030 to deliver on the 80% renewable energy targets.
- ESB's Networks Strategy: Networks for Net Zero, which sets out ESB Networks' role in enabling the delivery of the Government's Climate Action Plan 2023 and supports the decarbonisation of the electricity system by 2040.

Energy Security



Action 10 of the Energy Security Framework in Ireland to 2030 (ESF) proposes to align all elements of the planning system to fully support accelerated renewable energy development and ensure that the local planning policy framework supports the national objectives. The National Energy Security Framework (NESF) provides an overarching and comprehensive response to Ireland's energy security needs in the context of the war in Ukraine. A key aspect of this is local, community-based approaches to renewable energy, the reduction in the reliance on the grid transmission system (through local and domestic generation) and through microgeneration.

Recommendation 10: The Development Plan should include objectives supporting local and community based renewable energy projects to address Government policy and strategy for sustainable, secure and affordable energy.

Built Environment and Heating

The CAP25 includes measures to support the electrification of heating with targets set for 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030. The National Residential Retrofit Plan commits the Government to retrofit 120,000 dwellings to B2 or cost optimal by 2025 and 500,000 by 2030. The RSES also supports this.

Recommendation 11: The Department recommends that the Local Authority continue to implement policies such as the Social Housing Energy Efficiency retrofit programme, to support the ambitions of the National Residential Retrofit Plan, particularly the development of the electrification of heating, having regard to the CAP25, the RSES and the NPF.

Compact Growth and District Heating

The Plan should have regard to national and regional policies ambition for compact growth which can facilitate the development of low carbon district heating.

Recommendation 12: The Department recommends that the Local Authority examine the potential of district heating, including district heating derived from waste heat, geothermal energy and renewable energy, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies, having regard to the CAP25, RPO 7.38 of the RSES, NSO 8 and NPO 68 of the revised NPF, the National Heat Study and the Government's Policy Statement on Geothermal Energy for a Circular Economy. As such, policies in support of same are encouraged in the Development Plan.

Circular Economy

Ireland's transition to a circular economy is essential to meet climate targets and reduce resource intensity, as 50% of global emissions stem from resource extraction and processing. The Circularity Gap Report 2024 shows Ireland's circularity at just 2.7%, meaning over 97% of materials come from virgin sources. To address this, the government introduced the Waste Action Plan for a Circular Economy, the first Whole of Government Circular Economy Strategy and the Circular Economy Act 2022, which legally defines the circular economy and provides tools for enforcement, such as tackling illegal dumping. The next strategy, due in 2025, will set sector-specific targets and actions to drive systemic change, focusing on prevention, designing out waste, and influencing behaviour at all levels.

Recommendation 13: The Local Authority should support circular economy principles in the Development Plan and implement policy for same.

Waste Management

'Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects' provides a practical approach to construction and demolition (C&D) which is informed by best practice in the prevention and management of C&D wastes and resources from design through to construction and deconstruction. The Department advise the Local Authority to consult with their respective



Regional Waste Management Planning Office in relation to the National Waste Management Plan for a Circular Economy.

Recommendation 14: The Development Plan should have regard to the guidance 'Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects' and give effect to them through the objectives of the plan.

Geoscience Policy

The Department encourages the Local Authority to consider the following when finalising the Development Plan: Policy Statement on Mineral Exploration and Mining, Policy Statement on Geothermal Energy for a Circular Economy, EU Critical Raw Materials Act.

Recommendation 15: We would encourage the Local Authority to consider the policy where relevant for the Development Plan area.

Geoscience Data

Geological Survey Ireland (GSI), a section of DCEE, is the national earth science agency. GSI recommend using their various data sets for use in the Development Plan and when conducting the Strategic Environmental Assessment (SEA) of the plan. Datasets include land & soil, water, climate change, cultural heritage, material assets, the landscape, natural geo hazards, natural heritage.

The Geological Heritage of Louth audit was completed in 2013. We would welcome inclusion of the County Geological Sites within the new County Development Plan 2027-2033. You may also find our flood risk maps useful for flood risk assessment; these include both historic and predictive maps.

Transport

The CAP25 commits the Government to reducing transport emissions by 50% from 2018 emissions rates. CAP25 supports a significant increase in sustainable transport trips, through enhanced land-use planning, public transport, active travel, vehicle efficiency, 20% reduction in total vehicle kilometres, 50% reduction in fuel usage, fleet electrification and biofuels. We encourage the Council to refer to Agenda 2030.

Recommendation 16: The Local Authority is requested to consider the measures within the CAP25 relating to sustainable mobility and reducing the demand for transport journeys by private vehicles

(Avoid-Shift -Improve Framework) through more effective land use and transport planning integration and compact growth principles when drafting the Development Plan.

Land Use, Land Use Change and Forestry

Bioeconomy Action Plan 2023-2025 Action 5.1 seeks to enhance bioeconomy governance in Local Authorities and improve policy making for the bioeconomy to address climate action, green economy, enterprise, and economic development. A Nature Restoration Plan is currently being drafted by the Department.

Recommendation 17: The Local Authority is requested to consider the Actions of the Bioeconomy Action Plan 2023-2025 including Action 5.1, as relevant for the plan area, when drafting the Development Plan, and consider the related SDG 15.

Air Quality

The Department encourages the Local Authority to have regard to the Clean Air Strategy for Ireland. There are specific limits on air pollution for each station across the country which are set out in the Clean Air Strategy and the new EU Air Quality Directive. The Local Authority is requested to have regard to limits on air pollution and ensure that any measures set out in the Development Plan will not negatively impact on future air quality. Air quality data is available from EPA at www.airquality.ie

Chief Executive Opinion on Issues raised:

The Chief Executive notes and will have regard to the various legislation, plans, strategies and frameworks highlighted in the submission when drafting the Plan. A range of consultations with various stakeholders will occur to inform the Plan process.

The current LCDP 2021-2027 proactively promotes, through its policy objectives; sustainable transport modes, appropriately scaled renewable energy projects, retrofitting of buildings, provision of district heating, the circular economy, land use and air quality. The Draft Plan will review and assess the existing policy objectives and have regard to the above comments in the drafting of new policy objectives and narrative.

The Chief Executive welcomes the comments of the GSI and the availability of the wide range of databases and mapping tools. These resources will be utilised during the preparation of the Plan and in the Development Management process when assessing planning applications.

Chief Executive Recommendation:

To take account of, and incorporate where considered necessary, the stated legislation, plans, strategies, frameworks and recommendations set out in the submission by the Department of Climate, Energy and the Environment’s (DCEE) into the Draft Plan.

Have regard to the provided resources and datasets which will help develop the new policy objectives and narrative in the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-64

Submitted By:

Frank Lynch

Map showing land subject to Submission:



Figure 1: Map included as part of the submission illustrating the location of the lands (hatched in red).

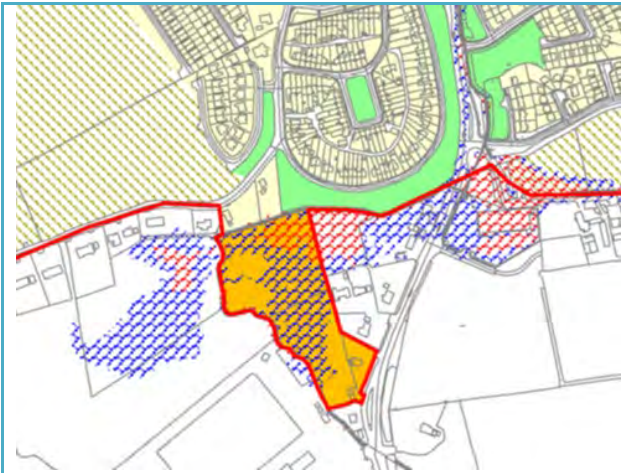


Figure 2: Extract from the current Ardee Zoning (LCDP 2021-2027) to illustrate the location and current zoning of the lands – New Residential Phase 2 (shaded orange).

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 2.3ha of land located off the N2 Drogheda Rd in Ardee, from A3 New Residential Phase 2 to A2 New Residential Phase 1.

The submission sets out that the lands: are near amenities and schools, have access available; and are in close proximity to sewerage and water mains.

Chief Executive Opinion on Issues raised:

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this submission at this stage.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-65

Submitted By:

Blackrock Tidy Towns

Summary of Main Issues Raised:

Vision for Our Community

Blackrock and Haggardstown is a thriving coastal community that balances growth with the protection of our



natural and built heritage. We want the provision of high-quality, low-density homes, accessible local services and safe, sustainable transport connections while enhancing its role as both a residential area and a visitor destination.

Our vision is: A community that grows sustainably and inclusively; A place where people of all ages feel connected and supported; A coastal area where natural heritage is valued and protected; A local economy that balances tourism with community needs.

Key Themes

A. Population & Housing

Provide a mix of housing types. Zoning needs to reflect this.

- Focus growth in serviced areas to prevent urban sprawl.

Promote the reuse of vacant and derelict buildings.

Ensure new housing integrates with community facilities and infrastructure and does not overwhelm existing services.

- Balance development around the town of Dundalk to relieve the pressure on Haggardstown/Blackrock.

B. Community & Facilities

Enhance sports, education, health childcare, and recreational spaces.

Develop shared hubs for social inclusion and cultural activities.

- Prioritise lifetime adaptability and universal design.

Encourage volunteering and events to strengthen community identity.

Include a planned upgrading of the key route Sandy Lane; improved footpaths and undergrounding of overhead networks.

- Provide a secondary school in the land designated for it west of the Dublin Road.

C. Transport & Connectivity

- Improve walking and cycling links between Blackrock, Haggardstown and Dundalk.

- Promote safe routes to school and improved public transport services.

Reduce car dependency, encourage active travel, safe routes to schools, and improve public transport.

- Free Park and ride train station hub in a designated area at Crumlin, Haggardstown.

- Accessible transport for older people, children and those with mobility needs.

- Include a policy to provide additional off-street parking in the village centre to cater for the significant growth of commercial activity and visitor numbers as a result of the work undertaken by ourselves.

Include the construction of a pedestrian and cycleway bridge over the mouth of the River Fane in the vicinity of the Fane View housing estate. This would open up the prospect of a coastal greenway route linking Blackrock to Seabank, Castlebellingham, Annagassan and beyond.

D. Natural & Built Heritage

- Hold paramount the importance of Dundalk Bay as a Natura 2000 site, SPA and SAC. Protect the coastline, wetlands and local biodiversity.

Address coastal erosion and flood risks with sustainable, nature-based solutions.



- Safeguard historic structures and encourage sensitive reuse.

Preserve the unique seaside character of Blackrock while supporting growth.

- Inclusion of the coastal road through the village as a Scenic Route, and the inclusion of a number of Views and Prospects.

Recognition of the special amenity value of Louth Bank Walls

- LCDP 2021-27 includes a policy to map and list public rights of way, and wonder whether this process was begun during the lifetime of the existing Plan?

- Recognition of the value of a range of trees and stands of trees.

- Relevant findings and recommendations from “Ecology and Biodiversity Enhancement Plan for Blackrock” (2019) and “The Architecture of Main Street, Blackrock” (2008) reports commissioned by Blackrock Tidy Towns be taken into account where relevant in the new Draft Plan.

E. Climate Action & Sustainability

- Promote renewable energy projects suited to community needs.
- Encourage energy-efficient homes and businesses.
- Expand green infrastructure.
- Improve waste reduction and recycling initiatives.

Incorporate the Coastal Greenway from Dundalk to Blackrock in the planned flood defences.

F. Economy & Tourism

Support local shops, services and small businesses.

Enhance Blackrock’s role as a seaside and leisure destination.

Develop cultural and maritime links to Carlingford and Dundalk Bay.

- Balance tourism growth with the needs of residents to maintain village character.
- Include Main Street, Blackrock as a Level 3 Retailing Centre. Otherwise, the retail/commercial centre of the village is not recognised at all in the Draft Plan as far as we can determine.

G. Infrastructure & Utilities

- Work with Uisce Éireann to improve wastewater capacity and services.
- Ensure water and wastewater infrastructure supports sustainable housing growth.

Upgrade sea defences to reduce coastal flooding risks. Incorporate a proposal for the restoration of the northern portion of the main beach which has gradually disappeared since the late 1950s. Blackrock Tidy Towns commissioned Aquafact International Services in 2009 to carry out a study and produce a high level design for the restoration of the beach, but the implementation of the recommendations has been on hold pending the design for the flood defences.

A copy of the report was forwarded to Louth County Council at the time.

- Upgrade Electrical and Broadband networks to support future population growth.

Core Priorities for 2027-2033

- Address the urgent need to upgrade wastewater facilities.
- Protect natural heritage especially the Natura 2000 site, Dundalk Bay.



- Protect built heritage.
- Deliver well designed, balanced and sustainable housing growth.
- Invest in community, recreation, and health facilities.
- Manage coastal flood risks.
- Enhance walking, cycling and public transport connections.
- Support the local economy and tourism in a balanced way.

Next Steps & Community Involvement

Outlines the process of the draft Plan and invites all stakeholders to take part.

Appendix Note

It is noted that the new Draft Plan regards the village of Blackrock as part of the greater Dundalk area rather than being its own settlement. We hope that the planned Local Area Plan will afford due recognition to the separate identity of Blackrock and to its unique and specific development requirements to maximise and protect this identity.

Chief Executive Opinion on Issues raised:

The Chief Executive acknowledges the submission made by Blackrock Tidy Towns, which highlights the thriving community of Blackrock. The submission sets out a vision for the community, alongside a range of upgrades and improvements deemed necessary to sustain the existing community and provide for future sustainable growth.

The submission helpfully breaks down these upgrades/improvements into a number of subheadings. A Local Area Plan for Dundalk was adopted in March 2025. The Development Strategy in the Local Area Plan will form the basis of the future development strategy for the area in the County Development Plan

The issues raised in the submission will be taken into consideration during the formulation of the Draft Plan. If the suggestions are deemed appropriate, feasible, and of social, environmental and/or economic benefit, then the Draft Plan will include relevant policy objectives, land zonings, and narrative which will seek their implementation.

Appendix Note

The designation of Dundalk as a Regional Growth Centre in national and regional policy is a recognition of the strategic importance of Dundalk as a location for employment growth and economic development. The settlement boundary which incorporates both the Dundalk and Blackrock area will ensure that greater coordination in decision-making can be made in areas such as land use zoning, infrastructure and economic investment, and the provision of education and community facilities.

Chief Executive Recommendation:

To include policy support in the Draft Plan that will facilitate the creation of an inclusive and sustainable community in Blackrock where existing and future residents have access to social and community facilities and the progression of projects that will support the creation of an attractive and sustainable environment for people to live and work.



Submission Ref. No:

LH-C144-DPIP-66

Submitted By:

The Heritage Council

Summary of Main Issues Raised:

The Heritage Council (HC) seeks to provide submissions on planning matters as they relate to Ireland's heritage, namely built, cultural and natural heritage.

National Planning and Policy Context

National Planning Framework April 2025 identifies "Enhanced Amenity and Heritage" as one of our national strategic outcomes. There are several national policy objectives in the NPF 2025 that cover landscape, cultural and natural heritage.

The 4th edition of Ireland's National Biodiversity Action Plan (NBAP) 2023 – 2030 states that "local authorities play a key role in biodiversity conservation through the planning system". Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans.

Heritage Ireland 2030 details a number of action points relevant for local authorities, and these should be included in forward plans.

Guidelines for Planning Authorities on Architectural Heritage Protection Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures (RPS) and Architectural Conservation Areas (ACA).

The Office of the Planning Regulator has also provided guidance on Archaeology in the Planning Process through Planning Leaflet 13.

Comments on Intention to Review Issues Paper

Introductory Comments

Ireland's national heritage is defined in the Heritage Act, 1995 as including: 'monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens, and parks and inland waterways.

Our submission is divided along the following themes: Strategic Planning, Climate Change and Heritage; Natural Heritage (inclusive of biodiversity, ecology, geology); Archaeological and Cultural Heritage; Landscape, Public Rights of Way, Tree Preservation Orders; and Architectural Heritage (including the Record of Protected Structures and Architectural Conservation Areas).

It is essential that the management of our heritage resource through the planning system is supported by adequate policies in county development plans which have a clear justification and are evidenced based.

Finally, the Heritage Council believe that plans need to be both accessible and more concise in order to make the planning system more accessible to the public. Land use zoning and specific designations, ranging from landscape character areas to natural heritage areas etc, with the adopted zoning map linked with the planning application viewer.

Strategic Planning, Climate Change and Heritage

Efficient use of Land, and Heritage

The Heritage Council strongly support the concept of compact growth, associated brownfield site identification and land activation, and the re-use of buildings. We encourage this county development plan to exhaust the



potential for brownfield site locations before any greenfield expansion is pursued. Optimising land use in an efficient manner reduces the built environment's footprint which also has benefits for climate action and biodiversity. We encourage the county development plan to achieve the following:

- Ensure that transport and land use patterns are strongly integrated, and our settlement patterns are conducive to non-car-based transport. The identification of land for housing and employment, and other uses should be directed towards existing or future planned transport infrastructure, or in sustainable locations next to existing services and amenities. This is relevant for both multi-house development and single dwellings.
- Avoid sites that have high ecological potential. The identification of sites for development should be based on an environmental constraints analysis with the least sensitive sites preferred.
- Prefer existing brownfield sites and well-located sites within the urban boundary and encourage development around all settlements including smaller "crossroads", "church and school" nodes in rural areas.
- A strategic objective for re-use of heritage buildings, heritage led regeneration and placemaking and conservation through use is needed.
- Increase efforts at pedestrianisation of towns and larger urban areas, and discourage car dominated streetscapes. Strategic placemaking policies are needed to ensure our settlements, particularly rural villages and towns "are a place to be, rather than a place to pass through".
- Promote village and town living and/or cluster development based on high quality design and quality living environments to be achieved by supportive development management standards/policies as an alternative to one off rural housing.

We also recognise the need for renewable energy development and the need to manage flood risk and therefore recommend the following principles:

1. Sites for renewable energy generating infrastructure should be identified based on the least environmentally sensitive locations namely ecological and geological designations, high value landscape character areas, as well as important archaeological and architectural heritage sites. Whilst wind speed/energy generation economics, and suitable geotechnical conditions need to be considered, the Heritage Council recommend that avoiding important heritage designations should be the initial first step in analysing sites suitable for wind, solar etc energy developments. Please also see point below on RED III Directive.
2. Any flood defence measures should be considered at the entire catchment level in the first instance. There is opportunity to manage flood risk and surface drainage via nature-based solutions, whereby lands liable to fluvial and surface water flooding should be avoided in terms of development, while at the same time natural habitats should be allowed to replenish in these flood plains. Equally the use of nature-based solutions for surface water drainage should be promoted, which can improve water quality and therefore have considerable biodiversity benefits.

Placemaking, Design and Heritage

Every county development plan should have comprehensive design and placemaking objectives and recommend the following:

Strategic Objective XX - Protect and enhance the built and cultural heritage resource of Louth ensuring that development proposals, both in the wider landscape, and in settlements, are informed by the historic context. Heritage led regeneration and placemaking will be promoted and supported.

Strategic Objective XX - Establish sustainable communities in a manner that consolidates development and amenities within walking and cycling distance, while ensuring that development avoids the most environmentally sensitive sites in the locality.



Renewables Directive III and areas suitable for renewables

The Heritage Council is conscious of the transposition of the Renewable Energy Directive 2023/2413 into Irish law. Within this directive the concept of "Renewable Acceleration Areas" is defined. This will identify "Areas Suitable for Wind Energy". The HC believes that there is an exceptional requirement that the selection of such areas, as part of plan making, is informed by heritage designations and features. A robust evidence base should be established as part of the plan drafting process, where a comprehensive environmental constraints analysis is undertaken, with the view to identify the least sensitive sites for renewables developments.

The Heritage Council recommend that the constraints analysis study be published with the draft plan, with a clear justification demonstrated for the location of sites suitable for renewables.

Natural Heritage

General Comment

The PADA 2024 under Section 50 requires that a planning authority shall prepare a strategy in their CDP for the conservation, protection, management and improvement of natural heritage. We believe it useful that local authorities consider dividing their policies for biodiversity into site based, and non-site based.

In addition, we recommend to local authorities to consider if "catch all" policy for ecological features e.g. a policy for the retention of natural features cover smaller stands of trees, hedgerows, watercourses etc, rather than having a policy for each feature. Equally this could be achieved for species-specific based policies.

The Heritage Council recommends the following be inserted as part of the list of strategic objectives in the vision and introductory sections of the plan:

Strategic Objective X.X - It is the objective of Louth County Council to conserve, and restore, the ecological network of Louth, by protecting sites of local, national and international importance, and ensuring that development proposals seek to retain natural features which are important for the biodiversity of the county.

National Nature Restoration Plan

The EU Nature Restoration Law seeks to restore at least 20% of the EU's land and sea areas by 2030. Given the large land use requirement involved, it is inevitable that county development plans will have to accommodate this national endeavour. The following objective is recommended:

Strategic Objective XX - Conserve ecosystems and habitats in Louth by protecting important natural heritage sites, both designated and non-designated, from inappropriate development, while simultaneously aiding nature restoration ambitions in line with the National Nature Restoration Plan.

There is a need to ensure that any nature restoration projects be fully grounded in the scientific method in advance of an application for planning permission, to ensure that the restoration aims and objectives are successful. Accordingly, the following policy should be included:

Policy Objective X - Proposals for nature restoration projects need to demonstrate that the project has been based on the best available scientific data and best practice

National Biodiversity Action Plan

Section 50 (2)(b) of the Planning and Development Act 2024 requires that the strategies for conservation, protection, management and improvement of biodiversity should be in accordance with the National Biodiversity Action Plan (NBAP). It is important the NBAP and Louth County Council's own Biodiversity Action Plan is consulted.

Site Based Policies

European Sites Designations



Special Areas of Conservation (SAC) and Special Protection Areas (SPA) are the primary international designations in the country. Policies and objectives are required that detail the requirements of these directives in relation to when an appropriate assessment/ screening opinion is required. It is noted that many applications should be accompanied by at least screening opinions but are not. Therefore, we recommend that in policies that cater for the protection of designated SACs/SPAs that these include a provision for the notification of such requirements in pre-application discussions to potential applicants.

National Designations

Our national designations are Natural Heritage Areas (NHA), as identified under the Wildlife Act 1976, proposed Natural Heritage Areas (pNHA), National Nature Reserves (NNR), and require specific policy provision. Ecological impact assessments are required for the national sites (NHA/pNHA/NNR), while appropriate assessment (NIS) is the necessary mechanism for SACs and SPAs.

A policy is required for NHA/pNHAs/NNRs that seeks to prevent damage or deterioration to the habitats/species that are the basis for the site designation/identification. Such policies should be based on the following: Development should be avoided within NHA/pNHA/NNR; Development proposals that may impact on a NHA/pNHA or NNR should be accompanied by an ecological impact assessment; and Proposals that have negative impacts on such sites will not be supported.

County Biodiversity Areas (CBAs)

There are many other sites which are of local importance for flora and fauna. Local authorities have an important role to play in preventing the loss of such sites and the species which rely upon them for their survival. Regard should be given to National Policy Objective 84 of the NPF. The LCDP 2021-27 contains good existing policies, such as NBG 9 and 11, albeit the most important of these features are not identified. The following objective is recommended:

Policy Objective XX County Biodiversity Areas - It is the objective of Louth County Council to prevent both direct and indirect damage or deterioration of County Biodiversity Areas. Development proposals which may impact on these sites should be accompanied by an ecological assessment of the features for which the site has been identified as being of county importance.

Nature Restoration sites

Some local authorities may have ambitious plans for ecological restoration on public lands. It may be necessary to identify such sites and establish a policy that not only gives planning support to such habitat improvement ambitions but ensures that proximate development does not prejudice future nature restoration ambitions. These should be referred to as 'nature restoration site'.

Non site Based Policies

Development, design and retention of natural features

Smaller ecological features such as hedgerows, field margins, grass verges, ponds and small stands of trees, should be retained, as part of site design. The following suggested policies are recommended in this regard:

Policy Objectives XX Natural Features, site design, and infrastructure

It is the objective of Louth County to prevent the undue loss of natural features, such as hedgerows, treelines, smaller stands of trees, grass margins and boundary walls that provide habitats for species. The design approach to landscaping and open space in new developments should retain natural features. How this has been achieved should be detailed in the drawings and design statements submitted with the application.

It is the objective of Louth County that any planting regime as part of site design and landscaping proposals is confined to native species and provenance. While maintenance regimes for hedgerows should be informed by



the relevant national guidance e.g. National Biodiversity Data Centre guidelines on hedgerow planting.

It is the objective of Louth County that all development proposals are designed with ecology in mind. Infrastructure including public lighting systems should be installed in a manner that prevents significant harm to species.

Water Environment and Ecology

Many of the country's important aquatic environments are protected under various designations. However, many watercourses and waterbodies are not, although they do fall under the general remit of the Water Framework Directive. Hydrological pathways are the most common avenues by which development may impact on aquatic ecosystems, and therefore it is essential that planning policy aims to protect the entire water environment. Several guidance documents exist from Inland Fisheries Ireland (IFI) and Local Authorities Water Programme (LAWPRO). These policies should include:

Policy X.X Aquatic Ecology and the Protection of the Water Environment - It is the objective of Louth County to prevent any further deterioration of the biological status of waterbodies and watercourses, with particular focus on catchments with good - high biological status.

All development proposals that may impact on the water environment should demonstrate how they have complied with the following, where relevant:

- *Planning for Watercourses in the Urban Environment Inland Fisheries Ireland*
- *Nature Based Management of Urban Rainwater and Urban Water Discharges, A National Strategy*
- *Implementation of Urban Nature Based Solutions - Guidance Document for Planners, Developers and Developer Agents. LAWPRO.*

Species specific survey requirements

There are several protected species that may be present outside of protected sites, therefore the following policy should be included:

Policy Objective X.X Species Specific Surveys - It is the objective of Louth County Council to ensure that applications that may impact on protected species/ species of conservation concern should be accompanied by a species-specific ecological survey, which can be included as part of general ecological assessments. The suitability of the receiving ecological environment to accommodate the following should be assessed e.g. Bat species, Swift and House Martin, Otter, Red Squirrel, Badger etc.

County Geological Sites

Although strongly intertwined with inherent landscape character, there will be particular geological sites of significant importance within our landscapes. Section 50(2)U of the PADA 2024 obliges a county development plan to include a strategy on "places, caves, sites, features and other objects of archaeological, geological, historical, scientific or ecological interest". County Geological Sites (CGSs) are the best examples of a given geological feature in each county and need to be promoted and protected through the county development plan. Robust policy for the protection of such sites should also be included in the plan, which establishes clear development management expectations.

Archaeological and Cultural Heritage

Defined and/or Designated Archaeology

Robust policies for the protection of archaeological monuments and objects will be required in the plan. These policies should seek to prevent direct negative impacts on such features, as well as indirect impacts on their setting. The policies for defined and/or designated archaeology could include the sequential principle of avoid, minimise or mitigate. Within this context policies should seek preservation in situ, or as a last resort,



preservation by record. The Plan should include the following objective:

Objective X - Proposals that may impact on the Outstanding Universal Value of the Bn1 na B6inne World Heritage Property (WHP) need to be accompanied by a Heritage Impact Assessment (HIA). This HIA needs to be prepared in line with the following:

- *Guidance and Toolkit for Impact Assessments in a World Heritage Context UNESCO (2022).*
- *Summary of the Attributes for Ireland's two existing World Heritage Properties 'Brú na Bóinne' and 'Sceilg Mhichíl' DHLGH (2023).*

Liaison with the National Monument Service (NMS) will be required for such applications, the nature and scope of which need to be demonstrated as part of the application.

Non-Defined/Non-Designated and Unknown/Discovered Archaeology

There may be other archaeological sites and objectives that currently do not benefit from designation/definition. There is an obligation on county development plans, under Section 50 (2)(g)(i) and (j) to have objectives more generally, for archaeological sites, any structures or parts of structures which are of special archaeological interest, as well as places, caves, sites, features and other objects of archaeological interest.

Policies will be needed in this regard that seek to protect material in situ by careful construction activities. In addition, the discovery of unknown objects/remains/features due to development activity will need to be catered for by policy which should establish proportionate conditions attached to planning permission. Large sites with a wide spatial footprint are likely to require pre-design archaeological investigations.

Scheme Design and Archaeology

In situ preservation can be advanced through a scheme design which is informed by the local archaeological heritage. This should not only include retention of archaeological features through site design, but also the setting of such objects and features.

In addition, in cases where preservation by record is required, information and interpretation of the historic archaeology in and around the site should be part of the design considerations for the site. This can be achieved by street naming, and landscape and public realm design.

Finally, some landscapes may be considered 'Heritage Landscapes' or 'Archaeological Landscapes'. We encourage local authorities to ensure that archaeologically rich areas, are fully integrated into landscape character assessments/landscape policies. Various development types can impact the setting of archaeological features. This is often accounted for in the Landscape and Visual Impact Assessment of schemes. It is essential that policies that refer to the setting of archaeological features also include a requirement that representative viewpoints as part of LVIA's include the setting of the key archaeological sites that may be affected by the development.

Public Realm, streetscape, and archaeology

Successful public realm proposals sensitively anchor off the heritage assets that exist, using them as the centrepiece in new public realm design. Archaeology can be incorporated into high quality public spaces with good interpretative resources for visitors and residents alike. Accordingly, HC recommend that robust public realm, interpretative and placemaking objectives in the CDP are established that seeks to enhance and promote local archaeological heritage. They should require a material palette and soft landscaping approach that fully incorporates features of archaeological and cultural interest, with the prominence of the archaeological feature(s) the aspiration in public realm design.

Landscape, Rights of Way, Tree Preservation Orders



Landscape

National policy set objectives for the protection and management of landscapes, views and prospects. National Policy Objective 90 of the NPF seeks to facilitate landscape protection, management and change through the preparation of a National Landscape Character Map as well as the development of guidance on local landscape character assessments. Until its implementation, local authorities need to continue to establish their own approach to landscape characterisation and review. This should make the distinction between inherent landscape character and the landscape viewpoints as enjoyed by people (views and prospects).

The landscape review should define landscapes initially on inherent cultural and natural heritage attributes. This should then provide description of what sort of development the area can accommodate. Landscape should consider townscape character also.

Once this is completed, clear development standards and expectations should be established, with the use of a hierarchy of importance. These policies should be informed by sound evidence bases.

Public Rights of Way and Access to Heritage

The HC supports public access to heritage sites in the CDP. The PADA 2024 includes an objective '*preserving a specific public right of way, including a public right of way which gives access to any seashore, mountain, lakeshore, riverbank, monument or other place of natural beauty or recreational utility*'. In identifying such access rights, we would recommend that consultation be undertaken with the county archivist and/or local studies librarian within local authorities.

It is important to note that the HC recognises the difficulties that local authorities have in this regard, as evidenced the OPR's Report on the matter. Therefore, the HC will seek to aid local authorities in relation to information sources where possible.

Tree Preservation Orders

Mature trees have both ecological and amenity value in towns, villages and cities, as well as the wider countryside. Many are of historical streetscape value and contribute significantly to the character of areas. The Heritage Council recommend that local authorities establish TPOs as part of the drafting of the county development plan. It is recognised that this may be more achievable as part of local area plans/settlement plans. Therefore, in this case the county development plan should include objectives for listing Tree Preservation Orders as part of settlement-based plans that will follow the adoption of the county development plan.

Natural heritage policies should cater for important biodiversity sites including woodlands, as well as the retention of hedgerows and trees as part of site design. Although some non-designated ecological sites/features may benefit from TPO status, there is a need for local authorities to identify TPOs specifically for amenity and public realm reasons.

Design of Green Infrastructure

The HC supports outdoor recreation that promotes people's engagement with heritage i.e. seashore, mountain, lakeshore, riverbank, monument or other place of natural beauty. The National Outdoor Recreation Strategy 2023-2027 has been prepared. This *Strategy* rightly notes that due to the strong links between outdoor recreation and biodiversity, all plans and projects should be appraised in terms of their impacts on biodiversity, by undertaking the necessary ecological assessments.

Whilst active travel and engagement with heritage and nature is supported by the Heritage Council, there is a need to protect the very biodiversity or heritage feature that people engage with while partaking in recreation and leisure.



Architectural Heritage

From the outset, the Heritage Council recommend that the strategic objectives for the county development plan should include the following strategic objective for architectural heritage:

Strategic Objective X - It is the objective of Louth County to provide protection to the existing built heritage of Louth. This includes both designated and non-designated structures and features which contribute distinctly to the local historic built environment, historic towns and wider cultural landscape.

Record of Protected Structures and Architectural Conservation Areas

The Heritage Council encourages Louth County to audit all settlements, and special architectural and archaeological clusters outside of settlements that would necessitate ACA designation and review those existing. This should be undertaken in line with the “*Architectural Heritage Protection – Guidelines*” 2004. In addition, all ACAs identified should be accompanied by a “*Character Appraisal/Synopsis*”.

In general terms, the Heritage Council would then emphasise that demolition in ACAs should be avoided. The following policy should be included in the plan:

Policy/Objective X: Departures from development management standards to facilitate the continued use of historic buildings in ACAs, as well as protected structures, structures listed on the NIAH, and the wider historic environment will be considered appropriate.

The Heritage Council do have concerns that other planning considerations may be compromising more important strategic planning objectives. here is a need that quantitative development management standards are not applied bluntly to heritage buildings, such as parking standards, privacy distances etc.

In relation to the RPS we encourage local authorities to review the National Inventory of Architectural Heritage (NIAH) within their local authority area to potentially make additions to the RPS. We would also encourage the local authority to elicit the views of local communities that may have knowledge of local non designated assets. This should be based on Architectural Heritage Protection Guidelines 2004.

While a clear accessible listing of the structures should be provided in the plan, the point data should also be included in an interactive map viewer. The Heritage Council would emphasise a particular policy for structures listed on the RPS, which may be of a ruinous nature/state. In this regard, we request that the policy include the following considerations:

Policy Objectives X - Proposals that seek to restore heritage buildings which are in a ruinous state/condition should demonstrate the following:

- *The necessary documentation submitted should be carried out by Conservation Grade 3 Architect or above.*
- *A comprehensive overview and evidence of the condition of the building, particularly in relation to the historic features remaining and the associated significance of the building, should be provided.*
- *How the proposed interventions and refurbishment approaches have been informed by this evidence and if appropriate how a modern intervention does not detract from the inherent historical significance of the structure and has therefore avoided conjectural restoration.*
- *An appreciation of the structure and its setting, as currently perceived as part of the overall cultural heritage landscape/townscape, as well as any ecological potential associated with the structure.*

Non-Designated Architectural Heritage Assets

Outside of the designated network (RPS and ACA) there may be locally important features and structures that should be better catered for in planning policy. This includes traditional buildings and buildings of vernacular character, including thatched properties. The latter faces challenges outside of the planning system, in terms of insurance, availability of materials and thatchers. The following policy is recommended:



Policy/Objective X: - To protect and facilitate the conservation of structures, sites and objects which are part of the County's distinct local, historical and vernacular heritage, and which may not necessarily benefit from designated status. This includes structures listed on the NIAH, which do not benefit from RPS status.

Design and the setting of historic features

There may be historic buildings/features/structures/objects which include street furniture (water pumps, vent stacks,) as well as prominent buildings which are found in our landscapes and townscapes. Development schemes should anchor off such architectural heritage assets, enhancing their setting as part of the public realm design of schemes. The following policy is recommended:

Objective X - Public realm design and the design of open spaces in new developments should enhance the setting of existing historic buildings, features, and objects in a manner that aids their prominence and contribution to character of place.

Special Areas of Planning Control

There are many areas that are of special significance and were/are focal points of civic life in towns, villages, and sometimes, in the wider landscape. Recent decades have seen such focal points of social life given over to facilitating car journeys and parking. Therefore, the Heritage Council are keen to ensure that social and civic spaces should be amplified and re-established.

Whilst national town centre first and regeneration strategies can aid this ambition; the Heritage Council contends that areas of special planning control can provide a framework for more innovative approaches for positive placemaking.

In a Louth context, Drogheda, particularly the area around Saint Laurence Gate, would benefit from such an integrated approach. This area currently is a car dominated townscape which undermines the legibility of the heritage town, resulting in an underappreciation of the historic built environment.

Enabling Development and Historic structures

There are many buildings including industrial, administrative, hospitals, mills and distilleries, and courthouses which may be more susceptible to vacancy due to changing operational requirements. Local authorities should actively encourage the re-use of such buildings and ensure that planning applications are reviewed flexibly to ensure a responsive planning environment. The following objective is therefore recommended in this regard:

Objective X: Enabling Development for Historic Structures:

It is the objective of Louth County to ensure that historic buildings and structures are reused and enhanced as part of development proposals. Schemes which fail to ensure continued appropriate re-use of historic buildings on site within the ownership boundary will not be supported. If historic structures and buildings are not conducive to operational requirements, a clear pathway for their re-use will need to be established before permission is granted.

Proposals which seek to comply with this policy will be supported by flexibility in terms of development standards, commensurate with the level of importance of the protected structure/historic building in question.

Other Matters

Mapping, Zoning and HeritageMaps.ie

The identification of key heritage sites should be an essential part of the mapping that accompanies the written statement of a county development plan. This should include Record of Protected Structures; Architectural Conservation Areas; Natura 2000 sites; NHAs, pNHAs, Nature Reserves and County Biodiversity Areas; Landscape and seascape character areas; and Recorded Monuments and Places.

Heritage Maps is an interactive viewer where you can find or identify heritage sites and explore heritage data



sets anywhere in Ireland. Many local authorities have been feeding into this resource on completion of their county development plan process, which has proven to be a valuable resource. Therefore, we would welcome engagement on how the mapped heritage sites as identified in the county development plan could be exported to Heritage Maps.

Environmental Assessment of Plans

It is essential that these are undertaken to the highest standards, where each policy/objective and zoning/designation mapping are individually assessed. The SEA and AA process will be of utmost importance to ensure that these iterative processes inform the least sensitive environmental sites for development of renewables, but also employment, housing and other infrastructure.

Conclusion

We have highlighted the importance of heritage not just at an individual policy level but also at the strategic level for the future development and land use planning of the county. This should be recognised in the plan to ensure that development requirements are achieved in a manner that protects and enhances heritage and the environment.

Chief Executive Opinion on Issues raised:

The Chief Executive welcomes the comments and guidance from The Heritage Council. The importance of our natural and built environment and the need to safeguard and protect it from negative factors is recognised.

Our natural environment not only provides biodiverse habitats for plants and species but provides a valuable resource to our own health and wellbeing. The Council recognises that Ireland, and the wider world, has been experiencing sustained extreme weather events and that our climate has been gradually warming in temperature, and understands our role in relation to the Climate Action and Low Carbon Development Act 2015.

Our built environment provides a unique identify for the county and its settlements, which requires the necessary safeguards to both protect and enhance it. Louth is steeped in cultural significance, and contains a rich a diverse range of buildings, monuments, open spaces, natural environments, and other sites. The Chief Executive recognises the need to ensure these are protected and promoted for future generations.

The current LCDP 2021-2027 contains a range of narratives, policy objectives, zonings, and a suite of environmental reports which seek to protect and enhance our natural and built environment, mitigate and adapt to climate change, and protect more integrate land use and transport. The above comments, guidance, legislation and sources are of great benefit to the Council and will be used to inform the drafting of the new Plan, and which will permeate across each chapter. The range of information and recommendations set out in the submission will be considered in the preparation of the Draft Plan and incorporated where considered applicable.

Chief Executive Recommendation:

Provide the necessary policy objectives, land zonings, narrative and associated maps in relation to natural and built heritage matters in the Draft Plan to ensure there is a strong policy framework that recognises the importance of the built and natural heritage of the County whilst also enabling investment in such structures and areas to ensure they can be adapted/used for current and future generations.



Submission Ref. No:

LH-C144-DPIP-67

Submitted By:

John Spain Associates on behalf of Lajona Limited

Summary of Main Issues Raised:

The purpose of this submission is to highlight the importance of preparing an updated Strategic Flood Risk Assessment (SFRA) and reviewing the existing flood mapping for the Draft Plan.

The SFRA for the current LCDP 2021-2027 was prepared in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (DoHLGH & OPW, 2009) and serves as a key tool in identifying areas of flood risk and guiding appropriate land-use decisions. However, the flood zones referenced in that SFRA rely largely on National Coastal Flood Hazard Mapping (NCFHM). While NCFHM provides a valuable national baseline, it represents projected tidal extents and does not incorporate detailed hydraulic modelling.

In recent years, more refined and locally calibrated hydraulic models, undertaken as part of planning applications have become available, incorporating updated river channel surveys, floodplain data, and structural information. Integrating this level of modelling into the new SFRA, including where flood mitigation strategies have been implemented as part of permitted schemes, would significantly improve the accuracy of flood zone delineation and strengthen the evidence base.

Updating and refining the SFRA at County Development Plan stage will therefore ensure that forthcoming LAPs are informed by the most accurate and current flood risk information, thus reducing inconsistencies and facilitating more coherent plan-led development.

Our client is agreeable to making information and modelling undertaken by their consultant JBA Consulting on land in Dundalk available to inform the Draft Plan SFRA.

Chief Executive Opinion on Issues raised:

Louth County Council recognises the importance of flood risk management in the plan preparation process. A Strategic Flood Risk Assessment (SFRA) for the County will be prepared in accordance with the requirements of 'The Planning System and Flood Risk Management Guidelines' (2009). The most recent flood mapping data made available from the Office of Public Works and the Council's Infrastructure section will be used to inform the SFRA. Regard will be given to the Planning Principles, Sequential Approach and definitions of Appropriate Development as set out in these Guidelines in the preparation of the Plan. The Draft Plan will recognise the importance of the Flood Relief Schemes within the County and will include policy objectives supporting the progression of these projects.

Any amendments to current land use zonings within the County will have regard to the most up to date flood zone data.

The incorporation of local modelling into the SFRA may be examined, however it is encouraged to submit these models and associated information at the next stage of the LDP process so that the Council can consult with the aforementioned partners to determine the suitability of development on the lands.

Chief Executive Recommendation:

Undertake a SFRA for the County in accordance with the requirements of 'The Planning System and Flood Risk Management Guidelines' (2009), using the most up to date flood data.

Include relevant policy objectives and zonings based on flood data and flood relief schemes.

Submission Ref. No:

LH-C144-DPIP-68

Submitted By:

Thomas Conry

Map showing land subject to Submission:

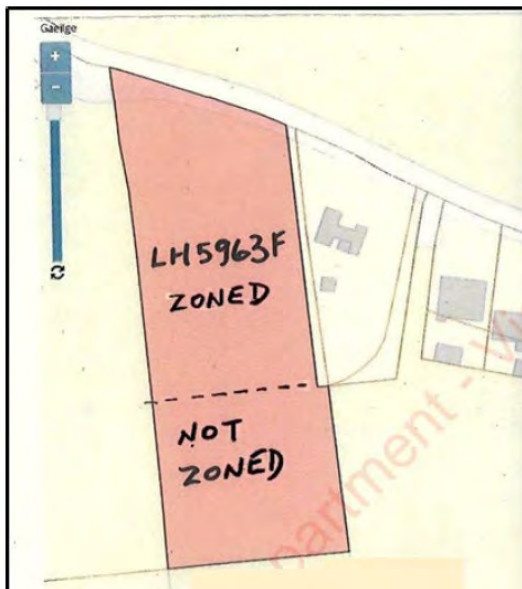


Figure 1: Map included as part of submission.

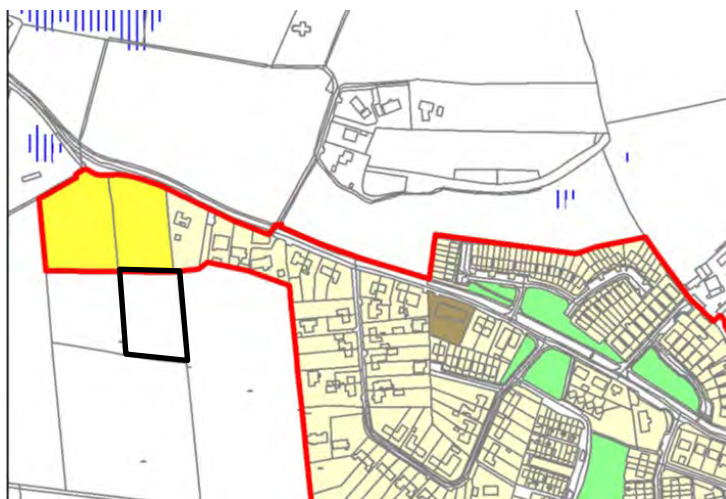


Figure 2: Extract from Clogherhead zoning map under the LCDP 2021-2027 to illustrate the location of the lands in the context of the settlement of Clogherhead (lands subject of rezoning request within the submission outlined in black for ease of reference).

Summary of Main Issues Raised:

The submission seeks the rezoning of the area of lands outlined in black in Figure 2 above to A2 New Residential Phase 1. The northern part of the submitter's landholding is currently zoned A2 New Residential Phase 1.



The submission sets out the following rationale for the rezoning request:

- New Section 28 Planning Guidelines
- To maximise the potential of the full land holding and activate development during the lifetime of the plan
- To move forward with a complete planning application for c.75 housing units.

Chief Executive Opinion on Issues raised:

The lands subject to this submission are currently outside of and immediately adjacent to the settlement boundary of Clogherhead as shown in Figure 2 above and are zoned Rural Policy Zone 2.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in black in Figure 2 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No: LH-C144-DPIP-71

Submitted By: David Hughes

Summary of Main Issues Raised:

The submission objects to any proposed wind farm development in or around Carlingford Lough and any other EU Designated Special Protection Area (SPA). The concerns are set out under the following core areas:

Environmental and Ecological Impacts on Protected Species and Habitats

- Carlingford Lough is protected under the EU Birds Directive, Habitats Direct and forms part of the Natura 2000 network.
- Wind energy infrastructure (onshore, nearshore or offshore) creates significant collision, displacement and disturbance pressures for the species identified in this SPA.
- Is a threat to red-listed and amber-listed bird species
- Carlingford Lough hosts a number of threatened species that are exceptionally vulnerable to wind turbine blades, noise and habitat disturbance with many of these species feeding, roosting or migrating through the Lough.
- EU Case law demonstrates that developments that risk adverse impacts on the integrity of an SPA must not



be permitted.

Legal and Financial Exposure for Louth County Council and the State

- Wind farms in or near SPAs are among the most legally challenged types of development in the EU.
- Under Order 99, as amended by Section 50B of the Planning & Development Act 2000, any resident, NGO or environmental body can challenge such a development at minimal personal cost, with cost protection applying. This would result in the Council/Government bearing the legal costs.
- If turbine or associated structures harm the integrity of the SPA, Ireland may face: EU Commission infringement actions, financial penalties, order for restoration of damaged habitats.

Availability of alternative, genuinely sustainable renewable energy options

- Wind energy is valuable, but site selection is critical.
- Installing turbines in or adjacent to a narrow coastal lough with large migratory bird populations is incompatible.
- Several low-impact renewable alternatives exist which deliver energy without damaging an SPA such as Solar Farms, Agrivoltaics (dual use land + solar), Battery storage and grid optimisation by the ESB Networks in the Cooley area and grants for rooftop, industrial estate and brownfield solar.

Landscape, Tourism and Amenity Impacts

- Carlingford Lough is a major tourism destination valued for its scenic beauty, nature walks, birdwatching, water-based activities and heritage & cultural attractions. Wind turbines would dominate the landscape, reduce the visual and recreational value of the area and impact on tourism revenue.

Chief Executive Opinion on Issues raised:

The concerns of the submitter in relation to the potential impact of wind farm proposals on Carlingford Lough are noted and the Chief Executive recognises the importance of ensuring the protection of designated European sites such as Carlingford Lough SPA.

The potential legal implications for the local authority arising from any appeals to planning decisions is not relevant to the Development Plan process.

The Draft Plan will set out policies and guidance in relation to wind energy development in the county and will support national targets in relation to electricity generation from renewable sources and renewable energy protects subject to compliance with the relevant planning and environmental criteria and considerations.

The assessment of planning applications for developments including wind farm proposals is carried out by the Development Management Section of the Planning Department and would include an assessment of the potential impacts on designated European Sites such as Carlingford Lough SPA. The Draft Plan will include policy objectives and guidance in relation to applications such as wind farms to ensure the appropriate assessment of the potential impact the environment, ecology, amenity and tourism among other considerations.

Chief Executive Recommendation:

To include policies supporting the implementation of the Climate Action Plan and the generation of electricity from renewable energy sources.

To include policies for the protection of designated European Sites.

To include guidance within the Development Management section of the Draft Plan in relation to the assessment and considerations regarding wind applications to ensure appropriate site selection and to prevent adverse impact arising from such applications.



Submission Ref. No:

LH-C144-DPIP-72

Submitted By:

Boyne Sports Campus Community

Summary of Main Issues Raised:

The submission proposes that a multi-disciplinary municipal sports campus be provided in the catchment area with backing from Meath and Louth County Council.

Background and Ethos Outlined: National Sports Policy 2018-2027 outlined.

Proposed Facility: Proposed facility to encompass swimming pool, sports hall, gym, ice rink, storage and service area, meeting and education rooms, all weather hockey pitches, tennis courts, 5G pitches and basketball court, cricket pitch, sensory area, climbing wall, running track, archery zone, BMX zone/skate park, recreational walking track, and coffee shop/ snack bar, possible co-location with Drogheda United Stadium

Needs

Dearth of Facilities: The area is poorly served in terms of sports and recreation facilities to cater for population of 67,000 set to grow to 100,000. Furthermore, Drogheda has a disproportion of DEIS areas.

Increased Demand: Increase in population has resulted in an increase in demand. Many young people have not been able to get involved; they might have continued participation later in life.

Women in Sport: There is increased demand from women and girls as they have few sports opportunities after leaving school, this facility would accommodate a full range of activities accessible to women of all ages.

Access to New Sports: New campus would provide access to new sports presently not catered for in the catchment. More sports and activities increase participation.

Learn to Swim/Lifesaving Classes: A properly designed swimming pool would provide access to every child in the catchment to aquatics facilities as well as water safety training.

Rental Costs: Many groups involved have to hire facilities sometimes, at exorbitant cost e.g. Wolves Basketball Club, the swimming, water polo and hockey clubs.

Access to Facilities: Drogheda swimming, water polo and triathlon club are operating at capacity and can't take on any additional members due to lack of availability at Aura. Senior members have to travel to Blanchardstown to train. Drogheda Wolves, Cycling and Triathlon club have no facilities of their own. The nearest Ice Rink is in Belfast.

Inclusivity: New campus would be fully accessible to all.

Similar Facilities Across Ireland: There are several multi-sports facilities in various locations e.g. Athlone, Ennis, Sligo, Waterford and Letterkenny. Proposal for Galway currently going through planning. South Louth and East Meath have similar sized catchments. Facilities In Drogheda haven't matched population growth.

Funding:

Construction: Various funding streams available at national and local level. There is an opportunity to initiate 'Action 52' in the National Sports Policy 2018-2027 to leverage funding.

On-going Costs: Minimal due to state of art facility, use of renewable energy and engagement with local industry.

Educational Opportunities: Opportunity to maximise the potential to expand current sports education offerings in the county given the recent announcement of the partnership between Queen's University Belfast (QUB) and



Dundalk Institute of Technology (DkIT) to establish DkIT as a University College of QUB.

Benefits: Increased participation, retention of participants, inclusive, community focus, shared facilities, all abilities catered for, access to new sports, reduced travel for training, potential hosting national championships, educational and training opportunities.

Chief Executive Opinion on Issues raised:

The importance of community and sports facilities is recognised as an essential aspect in the creation of sustainable, walkable, and socially inclusive neighbourhoods within Drogheda. The Chief Executive appreciates the contribution sport makes to the health and recreational needs of Drogheda's and Louth's residents.

The Louth County Development Plan 2027-2033 will have regard to the National Sports Policy 2018-2027. A cross-cutting theme of the County Development Plan is the promotion of healthy socially inclusive communities, as advised by the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). The Louth County Development Plan 2027-2033 would therefore look at policies that support the enhancement of existing and the provision of new recreational and sports facilities.

The Louth County Development Plan 2027-2033 will continue to support the development of community and sports facilities in Drogheda and will support any investment in the provision of new or extension of existing facilities, where a need for such facility is identified.

Chief Executive Recommendation:

To have regard to the National Sports Policy 2018-2027 in the preparation of the Draft Plan and to support the provision of sports and community facilities.

To support the growth of Dundalk Institute of Technology as a University College.

Submission Ref. No:

LH-C144-DPIP-75

Submitted By:

Jerome and Ann McEvoy

Map showing land subject to Submission:

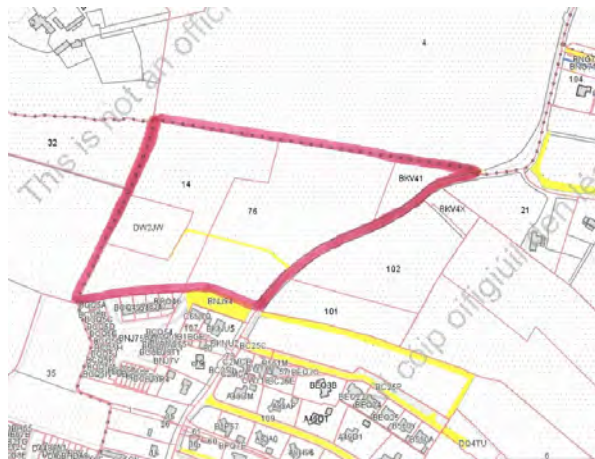


Figure 1: Map included as part of submission.

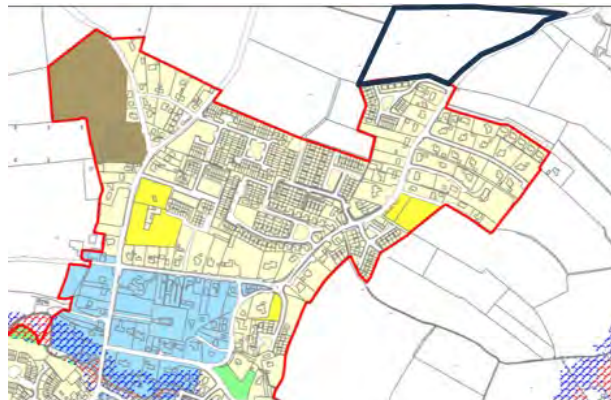


Figure 2: Extract from Termonfeckin zoning map under the LCDP 2021-2027 to illustrate the location of the lands in the context of the settlement of Termonfeckin (lands outlined in black for ease of reference - not to scale).

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 5.5ha of land on the western side of Big Street/R166 from agriculture (currently zoned Rural Policy 2) to Residential.

The submission sets out a rationale for the rezoning request including: to provide sites for housing for family members who have lived in the area all of their lives and who do not own their own houses. The submission further states that the lands are fully serviceable with public mains and sewerage, gas, electricity and broadband all passing along the boundary of the lands.

Chief Executive Opinion on Issues raised:

The lands subject to this submission are currently outside of and immediately adjacent to the settlement

boundary of Termonfeckin as shown in Figure 2 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the Draft Plan. Section 11(2) (bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in black in Figure 2 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-79

Submitted By:

Cllr Andrea McKeivitt on behalf of Ciarán and Miceál Hanlon

Map showing land subject to Submission:



Figure 1: Map provided as part of the submission which illustrates the four parcels of land subject in question.



Summary of Main Issues Raised:

The submission seeks the following amendments to the Muchgrange settlement boundary:

- Remove land marked '1' from the settlement boundary as it is subject to flooding, is agricultural land and will never be used for development within the settlement.
- Extend the settlement boundary to include lands marked '2' and '3'.
- Extend the settlement boundary at the lands marked '4' to the red line shown in Figure 1 above to align with the adjoining properties/settlement boundary.

Chief Executive Opinion on Issues raised:

Lands marked '1' are within the settlement boundary of Muchgrange, while lands marked '2', '3' and '4' are currently outside of the settlement boundary and are identified as Rural Policy Zone 2 under the LCDP 2021-2027.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) prevents zoning submissions from being considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-87

Submitted By:

Steven Peck Chartered Town Planner on behalf of
Niall Keenan and Thomas Kennan

Map showing land subject to Submission:

Extract from Louth County Development Plan 2021-2027 Development Plan Lordship Settlement Boundary Map showing position of subject land (approximate in green) in relation to the existing Lordship settlement boundary (red)

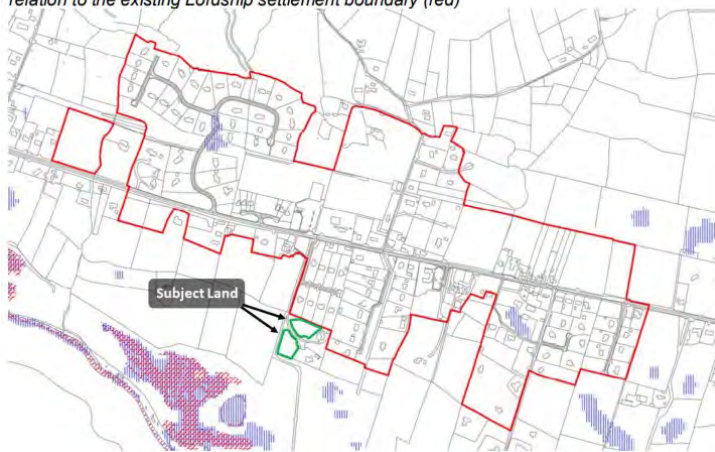


Figure 1: Map included as part of submission showing area in green which is the subject of the submission proposed for development which would extend the settlement limit of 'Lordship' Rural Node.

Summary of Main Issues Raised:

The submission relates to lands which immediately abuts the settlement boundary limit of Lordship, a designated 'Rural Node' under the current Louth County Development Plan 2021-2027.

The submitter confirms that this submission does not fall within the restriction under Section 11 (2) (bc) of the Planning & Development Act 2000 as it is a high-level submission and does not request the rezoning of lands at this stage.

Lordship is a designated Rural Node. This submission highlights the important role Rural Nodes can play in the sustainable accommodation of rural housing needs. The submission contends that the new development plan requires to have added supports provided which allows them to be used to accommodate rural housing needs.

The submission sets out that the new Plan should take the following measures into account to facilitate the development of Rural Nodes for rural needs housing:

- Boundaries should be large enough to include sufficient suitable and available lands to allow them to grow.
- Any lands coming forward to be included should be capable of being developed.
- Enhanced policies to support/encourage rural housing delivery in these Rural Nodes.
- Boundary of Lordship rural node should be large enough to include sufficient suitable and available lands to cater for the rural housing needs of persons from Rural Policy Zone 1 who can no longer obtain permission due to increased restrictions in this zone.
- Boundary of Lordship rural node should be enlarged to include the submitter's land (outlined in green in Figure 1).



Rationale:

- Rural Nodes accommodating rural needs housing development is considered consistent with Rural Housing Policy. This can accommodate rural housing need where it arises while supporting rural villages and environmental sustainability.
- Rural Nodes accommodating rural needs housing development supports the sustainable development of rural settlements and counters settlement decline. New development in Rural Nodes also supports rural services and facilities.
- Rural Nodes accommodating rural needs housing development reduces reliance on private car usage and improves the viability of rural public transport.
- Rural Nodes accommodating rural needs housing development reduces the level of new vehicle entrances and unsustainable traffic growth on rural roads, improving road safety.
- Rural Nodes accommodating rural needs housing development reduces harm to landscape character that could otherwise result.
- Rural nodes accommodating rural needs housing development reduces potential environmental harm, including e.g. pollution of ground and surface waters, harm to habitats (including the habitats of protected species), and the removal of hedgerows.

Conclusion

The submission considers that Rural Nodes have an important role to play in providing sustainable accommodation for persons with rural housing needs. The ability to build their house within these settlements is seen as important and opportunities should be made available. While the current plan does allow some rural needs housing, the quantum of lands set aside is limited and there is a need to have enhanced policies put in place to support the development of rural nodes.

Planning Benefits of Rural Nodes acting as a location for Rural Needs Housing Development in the Cooley Peninsula

Obtaining planning permission for a one-off house in Rural Policy Zones 1 and 2 is considered restrictive as applicants are required to demonstrate that they are local or that they have the required number of years residency in this area. The Local needs criteria for Zone 1 applicants requires them to demonstrate that they are either directly involved in agriculture or are sons or daughters of qualifying landowners or are persons who require to reside in Zone 1 for reasons of health reasons or that they are providing care to family members or those persons who may have been part of a legal separation and require accommodation in the immediate area.

Because of these restrictions this submission puts forward the rationale that Rural nodes should provide an alternative to one off house building by providing housing opportunities within these rural nodes (like Lordship) will enhance the sustainability of these rural Nodes and respond to local demands.

How Successfully is Lordship Rural Node performing its role of acting as a location for Rural Needs Housing

The submission has carried out research of all planning records for both the Lordship Rural Node and other Rural Nodes in Cooley Peninsula within the current plan period, which has indicated that only circa 13 rural needs dwellings in these settlements have been granted. Accordingly, the submitter has taken the view that these Rural Nodes are not responding adequately to rural needs of the local population.

The submission argues that the boundaries of Rural Nodes should be reviewed and revised to include sufficient lands within the boundaries to allow them to grow and develop. The new development Plan for Louth should have enhanced policies directing population into rural nodes particularly rural housing developments given the existing restrictions on one off housing in the Cooley Peninsula.

The submission notes that lands would be appropriate for development and are available.



Chief Executive Opinion on Issues raised

A key element of the growth strategy within the National Planning Framework and the Regional Spatial and Economic Strategy continues to be the need to achieve targets for compact in urban areas. The Draft Plan will review all policies in relation to growth both within the existing settlements and the qualifying criteria for rural housing policy having regard to national and regional policy and guidelines.

The lands subject to this submission are currently outside the settlement boundary of Lordship as shown in Figure 1 above.

In relation to the cited need to expand settlement boundaries of rural towns and villages and rural nodes to provide an alternative to one-off rural housing, the Draft Plan will review the development capacity of all existing settlements to determine if additional lands are required to meet the anticipated growth of the settlement and housing targets contained within the Core Strategy. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of these lands at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

To review all policies in relation to growth both within the existing settlements and the qualifying criteria for rural housing policy having regard to national and regional policy and guidelines in accordance with population targets as set out in the National Planning Framework and the Regional Spatial and Economic Strategy.

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-89

Submitted By:

Steven Peck Chartered Town Planner on behalf of
Alltec Fibre Ltd and Elizabeth Keenan

Map showing land subject to Submission:

Extract from Louth County Development Plan 2021-2027 Development Plan Mountbagnall Settlement Boundary Map showing position of subject land (approximate in green) in relation to the existing Mountbagnall settlement boundary (red)

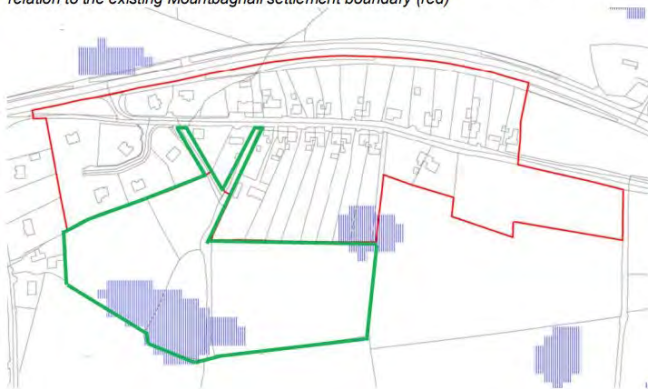


Figure 1: Map included as part of the submission illustrating the lands subject of this submission (outlined in green) which would extend the settlement limit of Mountbagnall Rural Node.

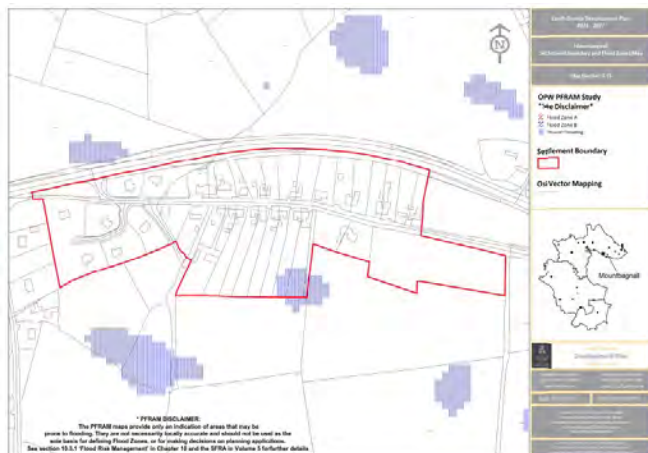


Figure 2: Copy of Mountbagnall Settlement Boundary & Flood Zones Map No. 5.15 Louth County Development Plan 2021-2027.

Summary of Main Issues Raised:

The submission relates to lands at Maddoxland and Mountbagnall, Riverstown Co. Louth which immediately adjoin the settlement boundary limit of Mountbagnall, is designated as a ‘Rural Node’ under the current Louth County Development Plan 2021-2027.

The submitter confirms that this submission does not fall within the restriction under Section 11(2)(bc) of the Planning & Development Act 2000 as it is a high-level submission and does not request the rezoning of lands at this stage.

This submission highlights the important role rural nodes can play in the sustainable accommodation of rural



housing needs and contends that the Draft Plan requires to have added supports provided which allows them to be used to accommodate rural housing needs.

The submission sets out that the new Plan should take the following measures into account to facilitate the development of rural nodes for rural housing:

- Boundaries should be large enough to include sufficient suitable and available lands to allow them to grow and allow for rural housing to be located within them
- Any lands coming forward to be included should be capable of being developed
- Enhanced policies to support/encourage rural housing delivery in these rural nodes.
- Boundary of Mountbagnall rural node should be large enough to include sufficient suitable and available land to cater for rural housing needs of persons from Rural Policy Zone 1 who can no longer obtain permission due to increased restrictions in this zone.
- Boundary of Mountbagnall rural node should be enlarged to include the submitter's land (outlined in green in Figure 1).

Rationale:

- Rural nodes accommodating rural needs housing development is considered consistent with rural housing policy. This can accommodate rural housing need where it arises while supporting rural villages and environmental sustainability.
- Rural nodes accommodating rural needs housing development supports the sustainable development of rural settlements and counters settlement decline. New development in rural nodes also supports rural services and facilities.
- Rural nodes accommodating rural needs housing development reduces reliance on private car usage and improves the viability of rural public transport
- Rural nodes accommodating rural needs housing development reduces the level of new vehicle entrances and unsustainable traffic growth on rural roads, improving road safety.
- Rural nodes accommodating rural needs housing development reduces harm to landscape character that could otherwise result.
- Rural nodes accommodating rural needs housing development reduces potential environmental harm, including e.g. pollution of ground and surface waters, harm to habitats (including the habitats of protected species), and the removal of hedgerows.

Conclusion

The submission considers that rural nodes have an important role to play in providing sustainable accommodation for persons with rural housing needs. The ability to build their house within these settlements is seen as important and opportunities should be made available. While the current plan does allow some rural needs housing, the quantum of lands set aside is limited and there is a need to have enhanced policies put in place to support the development of rural nodes.

Planning Benefits of Rural Nodes acting as a location for Rural Needs Housing Development in the Cooley Peninsula

Obtaining planning permission for a one-off house in Rural Policy Zones 1 and 2 is considered restrictive as applicants are required to demonstrate that they are local or that they have the required number of years residency in this area. The Local needs criteria for Zone 1 applicants requires them to demonstrate that they are either directly involved in agriculture or are sons or daughters of qualifying landowners or are persons who require to reside in Zone 1 for reasons of health reasons or that they are providing care to family members or



those persons who may have been part of a legal separation and require accommodation in the immediate area.

Because of these restrictions this submission puts forward the rationale that rural nodes should provide an alternative to one off house building by providing housing opportunities within these rural nodes like Mountbagnall and will enhance the sustainability of these rural nodes and respond to local demands.

The submission has carried out research of all planning records in the Cooley area which indicates that the number of permissions granted in Rural Policy Zone 1 has seen a significant decrease for rural needs housing when compared to the previous county development plan. Research carried out by the submission indicates that only 31 houses have been granted under the current County Development Plan 2021 – 2027 as compared to 102 rural needs dwellings under the previous plan for Rural Policy Zone 1.

The submission considers that the change in planning policy is resulting in local demographic decline by reducing planning permissions for local young persons and driving up prices for existing dwellings. This has resulted in emigration from the area by young persons and reduction in enrolment numbers in local schools e.g. Lordship, Rathcor and Grange. Accordingly, the submitter has taken the view that rural nodes in the Cooley Peninsula should be capable of accommodating additional rural housing needs given the planning policies in the immediate area.

How Successfully is Mountbagnall Rural Node performing its role of acting as a location for Rural Needs Housing

The submission has carried out research of all planning records for both the Mountbagnall Rural Node and other rural nodes in Cooley Peninsula within the current plan period, which has indicated that only circa 13 rural needs dwellings in these settlements have been granted. Accordingly, the submitter has taken the view that these rural nodes are not responding adequately to rural needs of the local population.

The submission argues that the boundaries of rural nodes should be reviewed and revised to include sufficient lands within the boundaries to allow them to grow and develop. The new development plan for Louth should have enhanced policies directing population into rural nodes particularly rural housing developments given the existing restrictions on one off housing in the Cooley Peninsula.

The submission notes that lands under the control of his client would be appropriate for development and is available.

Chief Executive Opinion on Issues raised:

A key element of the growth strategy within the National Planning Framework and the Regional Spatial and Economic Strategy continues to be the need to achieve targets for compact in urban areas. The Draft Plan will review all policies in relation to growth both within the existing settlements and the qualifying criteria for rural housing policy having regard to national and regional policy and guidelines.

The lands (subject of this submission) are currently outside of the settlement boundary of Mountbagnall as shown in Figure 1 above. The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Plan.

The submission acknowledges that existing rural nodes have provided opportunities for rural generated housing needs to be met by provision of sites within these nodes. A range of policies currently exist to strengthen and rejuvenate rural nodes. The potential for existing rural nodes to accommodate further growth will be examined as part of the preparation of the Draft Plan. This examination will be carried out in the context of the level of services currently available, the landscape in which the settlement is located, the availability of water services

infrastructure, and the quality of the local road network.

An assessment of applications in Rural Policy Zones 1 and 2 will be undertaken to establish the extent of grants and refusals for one off housing in Rural Policy Zones 1 and 2 alongside the number of applications made and granted or refused in rural nodes as part of the preparation of the Draft Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of these lands at this stage of the plan review process. However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

To carry out a review of the current rural housing policy for the County and review development activity in rural nodes as part of the preparation of the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-90

Submitted By:

Steven Peck Chartered Town Planner on behalf of Alltec Fibre Ltd c/o Niall Keenan

Map showing land subject to Submission:

Extract from Louth County Development Plan 2021-2027 Development Plan Gyles Quay Settlement Boundary Map showing position of subject land (approximate in green) in relation to the existing Gyles Quay settlement boundary (red)

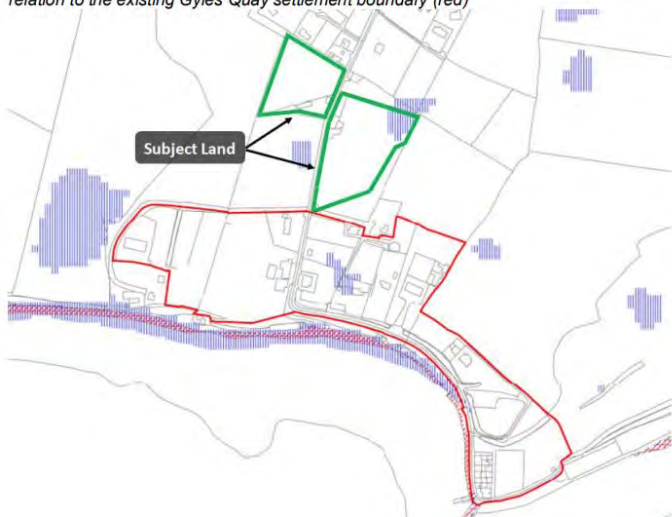


Figure 1: Map included as part of submission showing area in green which is the subject of the submission proposed for development which would extend the settlement limit of 'Gyles Quay' Rural Node.

Summary of Main Issues Raised:

The submission relates to lands at Maddoxland, Riverstown Co. Louth which are adjacent to the settlement



boundary limit of Gyles Quay, a designated as a 'rural node' under the current Louth County Development Plan 2021-2027.

The submitter confirms that this submission does not fall within the restriction under Section 11 (2) (bc) of the Planning & Development Act 2000 as it is a high-level submission and does not request the rezoning of lands at this stage.

This submission highlights the important role rural nodes can play in the sustainable accommodation of rural housing needs and contends that the Draft Plan requires to have added supports provided which allows them to be used to accommodate rural housing needs.

The submission sets out that the new Plan should take the following measures into account to facilitate the development of rural nodes for rural housing:

- Boundaries are drawn large enough to include sufficient suitable and available lands to allow them to grow.
- Any lands coming forward to be included should be capable of being developed.
- Enhanced policies to support/encourage rural housing delivery in these Rural nodes.
- Boundary of Gyles Quay rural node should be large enough to include sufficient suitable and available lands to cater for the rural housing needs of persons from Rural Policy Zone 1 who can no longer obtain permission due to increased restrictions in this zone.
- Boundary of Gyles Quay rural node should be enlarged to include the submitter's land (outlined in green in Figure 1).

Rationale:

- Rural nodes accommodating rural needs housing development is considered consistent with rural housing policy. This can accommodate rural housing need where it arises while supporting rural villages and environmental sustainability. This is considered to be consistent with National, Regional and local policies.
- Rural nodes accommodating rural needs housing development supports the sustainable development of rural settlements and counters settlement decline. New development in Rural nodes also supports rural services and facilities.
- Rural nodes accommodating rural needs housing development reduces reliance on private car usage and improves the viability of rural public transport.
- Rural nodes accommodating rural needs housing development reduces the level of new vehicle entrances and unsustainable traffic growth on rural roads, improving road safety.
- Rural nodes accommodating rural needs housing development reduces harm to landscape character that could otherwise result.
- Rural nodes accommodating rural needs housing development reduces potential environmental harm, including e.g. pollution of ground and surface waters, harm to habitats (including the habitats of protected species), and the removal of hedgerows.

Conclusion

The submission considers that rural nodes have an important role to play in providing sustainable accommodation for persons with rural housing needs. The ability to build their house within these settlements is seen as important and opportunities should be made available. While the current plan does allow some rural needs housing, the quantum of lands set aside is limited and there is a need to have enhanced policies put in place to support the development of rural nodes.



Planning Benefits of Rural Nodes acting as a location for Rural Needs Housing Development in the Cooley Peninsula

Obtaining planning permission for a one-off house in Rural Policy Zones 1 and 2 is considered restrictive as applicants are required to demonstrate that they are local or that they have the required number of years residency in this area. The local needs criteria for Zone 1 applicants requires them to demonstrate that they are either directly involved in agriculture or are sons or daughters of qualifying landowners or are persons who require to reside in Zone 1 for reasons of health reasons or that they are providing care to family members or those persons who may have been part of a legal separation and require accommodation in the immediate area.

Because of these restrictions this submission puts forward the rationale that rural nodes should provide an alternative to one off house building by providing housing opportunities within these rural nodes (like Gyles Quay) will enhance the sustainability of these rural nodes and respond to local demands.

The submission has carried out research of all planning records in the Cooley area which indicates that the number of permissions granted in Rural Policy Zone 1 has seen a significant decrease for rural needs housing when compared to the previous County Development Plan. Research carried out by the submission indicates that only 31 houses have been granted under the current County Development Plan 2021 – 2027 as compared to 102 rural needs dwellings under the previous plan for Rural Policy Zone 1.

The submission considers that the change in planning policy is resulting in local demographic decline by reducing planning permissions for local young persons and driving up prices for existing dwellings. This has resulted in emigration from the area by young persons and reduction in enrolment numbers in local schools e.g. Lordship, Rathcor and Grange.

Accordingly, the submitter has taken the view that rural nodes in the Cooley Peninsula should be capable of accommodating additional rural housing needs given the restrictive planning policies in the immediate area.

How Successfully is Gyles Quay Rural Node performing its role of acting as a location for Rural Needs Housing

The submission has carried out research of all planning records for both the Gyles Quay rural node and other rural nodes in Cooley Peninsula within the current plan period, which has indicated that only circa 13 rural needs dwellings in these settlements have been granted. Accordingly, the submitter has taken the view that these rural nodes are not responding adequately to rural needs of the local population.

The submission argues that the boundaries of rural nodes should be reviewed and revised to include sufficient lands within the boundaries to allow them to grow and develop. The new development Plan for Louth should have enhanced policies directing population into rural nodes particularly rural housing developments given the existing restrictions on one off housing in the Cooley Peninsula.

The submission notes that lands under the control of his client would be appropriate for development and is available.

Chief Executive Opinion on Issues raised:

A key element of the growth strategy within the National Planning Framework and the Regional Spatial and Economic Strategy continues to be the need to achieve targets for compact in urban areas. The Draft plan will review all policies in relation to growth both within the existing settlements and the qualifying criteria for rural housing policy having regard to national and regional policy and guidelines.

The lands subject to this submission are currently outside of the settlement boundary of Mountbagnall as shown in Figure 1 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to the defined



boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Plan.

The submission acknowledges that existing rural nodes have provided opportunities for rural generated housing needs to be met by provision of sites within these nodes. A range of policies currently exist to strengthen and rejuvenate rural nodes. The potential for existing rural nodes to accommodate further growth will be examined as part of the preparation of the Draft Plan. This examination will be carried out in the context of the level of services currently available, the landscape in which the settlement is located, the availability of water services infrastructure, and the quality of the local road network.

An assessment of applications in Rural Policy Zones 1 and 2 will be undertaken to establish the extent of grants and refusals for one off housing in Rural Policy Zones 1 and 2 alongside the number of applications made and granted or refused in rural nodes as part of the preparation of the Draft Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of these lands at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

To carry out a review of the current rural housing policy for the County and review development activity in rural nodes as part of the preparation of the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-97

Submitted By:

Brady Hughes Consulting on behalf of The Callan Family

Summary of Main Issues Raised:

The submission is made on behalf of The Callan Family, a significant landowner in Drogheda and sets out the following points for consideration when preparing the new Development Plan for County Louth:

Provision of Housing and the role of Drogheda:

Drogheda sits at the top of the Settlement Hierarchy and is a designated Regional Growth Centre as per the NPF. The National Planning Framework (NPF) Implementation: Housing Growth Requirements (July 2025) now requires Louth County Council to plan for 1,677 new homes per annum to 2034, significantly above the previous target. With the required headroom of 50%, the provision of lands shall accommodate 2,516 units per annum to 2034.

According to the Issues Paper, the housing stock in the county has increased on average 573 per annum between 2016-2022. This figure has improved between 2022 and the present day with 1,873 units completed in Drogheda alone between the end of 2021 to Q2 (Source: CSO).



National Policy Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Current Position for Drogheda – Baseline Assessment

Drogheda is a Regional Growth Centre and there is a focus on supporting the continued development of the town, functioning as a driver for regional growth along the Dublin-Belfast Economic Corridor.

The current County Development Plan (CDP) seeks to facilitate the continued expansion and growth of the town based on principles of balanced and sustainable development that enables the creation of employment and economic investment.

Currently the CDP, along with the northern environs area of Drogheda, zoned 22 sites for housing development. Of these:

- 3 are existing sports grounds and unlikely to deliver housing in the short-term.
- 2 are awaiting planning decisions and may deliver a total of 90 units only.
- 5 sites have had no applications submitted since 2021 and should be discounted in terms of short-term delivery potential.
- 4 sites are owned by Louth County Council, with construction commenced on only two of the sites.
- 2 sites have planning permission for over two years but have not commenced.
- 3 privately owned sites are under construction but have no further capacity to deliver beyond current phases.
- 3 sites are fully developed with no further capacity available.

Apart from the northern environs, smaller sites zoned for residential development in Drogheda are not making a significant contribution to housing delivery. If Drogheda continues to grow, it will be necessary to identify new residential opportunity sites.

Required Response / Submission

The submission suggests that Drogheda's housing target (2,447 households from 2021-2027 i.e. 400 per year) should be increased.

The current core strategy allots 37.5% of the entire household allocation to Drogheda (2,447 out of 6,524 units). If this allocation is applied proportionately to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom, Drogheda should be targeting delivery of at least 943 units per annum for the next 10 years. This generates a requirement over the next decade for approximately 270ha of land zoned for Residential development (assuming a delivery density of 35 dwellings per ha).

The area of the north Drogheda environs measures 253ha and is approximately 40% built out. The remaining lands in the north Drogheda area cannot deliver the scale of housing required in Drogheda over the next 10 years. Planning authorities must consider the longer-term housing requirements in the short-term, given the imminent move to 10-year development plans.

There are considerable landholdings in the north Drogheda area that have shown little to no interest in being developed and while residential zoning should remain on all of these lands, they cannot be relied upon to deliver to housing targets or be allowed to hold up the delivery of alternative sites. Any increase in the quantum of zoned land should be consistent with the Minister's direction to the Chief Executive, Drogheda's designation as a Regional Growth Centre and strategic location on Dublin-Belfast Economic Corridor, the need to support revitalisation through critical mass in population and the NPF objectives for compact growth, regeneration and infrastructure and plan-led development.

The Revised NPF provides specific guidance on the growth of Drogheda including focusing development along



the Dublin-Belfast Economic Corridor and the delivery of additional housing. Consideration must be given to extending the settlement boundary of Drogheda north of the PANCR to cater for the anticipated growth.

We would encourage a proactive approach with respect to identification of suitable lands and with a view to aligning local delivery mechanisms with national objectives thus ensuring a sustainable, serviced, and plan-led housing strategy for Drogheda to 2040. If this means that the settlement boundary for Drogheda would need to be extended, as would seem to be the case, it is suggested that the new Development Plan at least reserve the necessary lands to meet the NPF Implementation requirements to 2040 as Strategic Reserve and to zone those lands closest to the existing PANCR access points and associated infrastructure for residential purposes now.

Note: Details of the land in the ownership of the submitter have not been included as part of this submission.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of Drogheda as a Regional Growth Centre along with Dundalk. The importance of its strategic location along the Dublin-Belfast Economic Corridor will continue to drive growth and the Draft Plan will seek to support the continued growth of the town in a sustainable manner to achieve its potential.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a ‘Settlement Capacity Audit’ to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

The submission sets out that the growth strategy should be longer-term given the imminent move to 10-year development plans. The Planning and Development Act 2024 was signed into law in October 2024. Chapter 5 of Part 3 of the Planning and Development Act 2024 details the statutory process for the preparation and making of a Development Plan and the information required to be included in same. Under this legislation, the duration of a Development Plan would be 10 years. It is acknowledged that under the provisions in Part 3 of the 2024 Planning and Development Act that the lifetime of Development Plans will be 10 years. However, this Development Plan is being prepared under the 2000 Act (as amended) and therefore will have a life of 6 years. Headroom of up to 50% will be factored into the calculation for the quantum of residential lands required to meet the housing growth requirements for the County during the lifetime of the Plan. This quantum of headroom is allowed for in the NPF Implementation Housing Growth Requirements Guidelines published in July 2025.



Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the 'NPF Implementation Housing Growth Requirement Guidelines' into the Core Strategy of the Draft Plan.

To ensure there are sufficient lands available throughout the County and in particular the settlements designated for growth to meet the projected housing requirements identified for Louth in the Housing Growth Requirement Guidelines, which will be transposed into the Core Strategy of the County Development Plan.

To continue to promote the towns of Drogheda and Dundalk as Regional Growth Centres and provide a policy framework for the settlements to ensure they will be able to realise their economic and employment potential and develop into centres of scale that can facilitate population and economic growth.

Submission Ref. No:

LH-C144-DPIP-99

Submitted By:

Brady Hughes Consulting on behalf of The Caffrey Family

Summary of Main Issues Raised:

The submission is made on behalf of The Caffrey Family, a significant landowner and longstanding business operator in Drogheda and sets out the following points for consideration when preparing the new Development Plan for County Louth:

Provision of Housing and the role of Drogheda:

Drogheda sits at the top of the Settlement Hierarchy and is a designated Regional Growth Centre as per the NPF.

The National Planning Framework (NPF) Implementation: Housing Growth Requirements (July 2025) now requires Louth County Council to plan for 1,677 new homes per annum to 2034, significantly above the previous target. With the required headroom of 50%, the provision of lands shall accommodate 2,516 units per annum to 2034.

According to the Issues Paper, the housing stock in the county has increased on average 573 per annum between 2016-2022. This figure has improved between 2022 and the present day with 1,873 units completed in Drogheda alone between the end of 2021 to Q2 (Source: CSO).

National Policy Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Current Position for Drogheda – Baseline Assessment

Drogheda is a Regional Growth Centre and there is a focus on supporting the continued development of the town, functioning as a driver for regional growth along the Dublin-Belfast Economic Corridor.

The current County Development Plan (CDP) seeks to facilitate the continued expansion and growth of the town based on principles of balanced and sustainable development that enables the creation of employment and economic investment.

Currently the CDP, along with the northern environs area of Drogheda, zoned 22 sites for housing development.



Of these:

- 3 are existing sports grounds and unlikely to deliver housing in the short-term.
- 2 are awaiting planning decisions and may deliver a total of 90 units only.
- 5 sites have had no applications submitted since 2021 and should be discounted in terms of short-term delivery potential.
- 4 sites are owned by Louth County Council, with construction commenced on only two of the sites.
- 2 sites have planning permission for over two years but have not commenced.
- 3 privately owned sites are under construction but have no further capacity to deliver beyond current phases.
- 3 sites are fully developed with no further capacity available.

Apart from the northern environs, smaller sites zoned for residential development in Drogheda are not making a significant contribution to housing delivery. If Drogheda continues to grow, it will be necessary to identify new residential opportunity sites.

Required Response / Suggested Action

The submission suggests that Drogheda's housing target (2,447 households from 2021-2027 i.e. 400 per year) should be increased.

The current core strategy allots 37.5% of the entire household allocation to Drogheda (2,447 out of 6,524 units). If this allocation is applied proportionately to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom, Drogheda should be targeting delivery of at least 943 units per annum for the next 10 years. This generates a requirement over the next decade for approximately 270ha of land zoned for Residential development (assuming a delivery density of 35 dwellings per ha). Any increase in the quantum of zoned land should be consistent with the Minister's direction to the Chief Executive, Drogheda's designation as a Regional Growth Centre and strategic location on Dublin-Belfast Economic Corridor, the need to support revitalisation through critical mass in population and the NPF objectives for compact growth, regeneration and infrastructure and plan-led development.

The submission sets out that all options for the delivery of housing within the built-up area of the town should be considered when determining where new residential development should occur. All vacant, undeveloped plots should be assessed for residential development regardless of their current zoning.

We would encourage a proactive approach with respect to identification of suitable lands and with a view to aligning local delivery mechanisms with national objectives thus ensuring a sustainable, serviced, and plan-led housing strategy for Drogheda.

Note: Details of the land in the ownership of the submitter have not been included as part of this submission.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of Drogheda as a Regional Growth Centre along with Dundalk. The importance of its strategic location along the Dublin-Belfast Economic Corridor will continue to drive growth and the Draft Plan will seek to support the continued growth of the town in a sustainable manner to achieve its potential.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.



With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the ‘NPF Implementation Housing Growth Requirement Guidelines’ into the Core Strategy of the Draft Plan.

To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

To include relevant policy objective(s) to continue to support the growth and expansion of Drogheda, as a designated Regional Growth Centre, in a sustainable manner.

To review all existing lands zoned for residential use to take account of current land uses, with consideration being given to the likelihood of housing being delivered on said lands.

Submission Ref. No:

LH-C144-DPIP-100

Submitted By:

Brady Hughes Consulting on behalf of The Hartigan Family

Summary of Main Issues Raised:

The submission is made on behalf of The Hartigan Family, a significant landowner in Baltray and sets out the following points for consideration when preparing the new Development Plan for County Louth:

Provision of Housing and the role of Small Towns, Villages and the rural area:

The submission provides the settlement hierarchy of County Louth and identifies Baltray as one of eight ‘Small Towns and Villages’. The Small Towns and Villages, together with the Rural Nodes have the potential to provide housing to a rural hinterland in a way that could provide a meaningful and viable alternative to dispersed one-off housing in the open countryside.

The National Planning Framework (NPF) Implementation: Housing Growth Requirements (July 2025) now requires Louth County Council to plan for 1,677 new homes per annum to 2034, significantly above the previous target. And with a required headroom of 50%, the provision of lands should accommodate 2,516 units per annum to 2034.



National Policy Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Current Position for Baltray and other rural settlements

The entire housing allocation (within the current CDP) for County Louth from 2021-2027 is 6,524, with the Small Towns and Villages allocated 719 (11%) of this figure. Should Louth County Council apply the proportional allocation to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom (required to address potential non-activation of lands), there will be a target delivery of 276 new homes per annum in the small towns and villages, rural nodes and the rural area for the next 10years.

If growth is to continue in accordance with National and Regional planning policies, it will be necessary to identify additional lands to meet the housing targets for the county within the NPF. It would be more appropriate to locate additional houses in Small Towns and Villages such as Baltray, rather than one-off houses in the open countryside.

Suggested Response / Submission

The submission suggests that Louth's housing target for each settlement and settlement class within the core strategy hierarchy must be increased at least proportionally. This would mean an additional 276 new homes per annum across the small towns and villages like Baltray, the rural nodes and the rural area.

The submitters are residents of Baltray and would like to see rural towns and villages such as Baltray supported with respect to population growth and increased provision of services. The submission considers that Baltray has capacity to deliver additional housing over the coming years and life of the new development. This can be achieved via developer driven development and via serviced sites schemes as envisaged by NPO18(b).

To realise these opportunities, the submission requests that the planning authority consider the expansion of the settlement boundary to allow for additional residential development and to include specific policy objectives supporting the development of serviced sites schemes within/adjacent to the settlement.

Should additional lands at Baltray be identified for residential development, they could include for the delivery of an east-west link road connecting Baltray to the Termonfeckin Road. This would provide an alternative access for emergency vehicles as the only route into the village is susceptible to flooding. The east-west link was originally included in Variation No. 3 of the LCDP 2009 to provide a link between The Cottages and the strategic land reserve now occupied by Braghan housing development, which did not include this link in the development.

Note: Details of the land in the ownership of the submitter have not been included as part of this submission.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of the Small Towns and Villages within the overall settlement hierarchy for the county.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement



hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter. Furthermore, the submission sets out that they are a significant landowner in Baltray however details of the landownership has not been submitted. Should the submitter wish to have a particular parcel of land considered for re-zoning or other matters, a map identifying the lands in question should be included as part of any future submission.

In relation to the identification of an east-west link road connecting Baltray to the Termonfeckin Road, any infrastructure deficiencies and/or requirements will be identified as part of the Settlement Capacity review which will inform the Draft Plan and as noted above, a further public consultation period will be held upon publication of the Draft Plan.

As noted above, the Draft Plan will be consistent with national and regional planning policy, and the Chief Executive recognises the importance of National Planning Objective 18(b) of the NPF which seeks to reverse rural decline by creating serviced sites in small towns and villages for self-built homes. The Draft Plan will support and facilitate rural regeneration through the provision of policy objectives in relation to same.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the 'NPF Implementation Housing Growth Requirement Guidelines' into the Core Strategy of the Draft Plan.

To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

To include relevant policy objective(s) to support and facilitate rural regeneration such as identifying opportunities for serviced sites within settlements.

To examine the need for an east-west link between Baltray and the Termonfeckin Road as part of the Settlement Capacity review.

Submission Ref. No:

LH-C144-DPIP-102

Submitted By:

Brady Hughes Consulting on behalf of Apolloseven Properties One Limited

Summary of Main Issues Raised:

The submission is made on behalf of Apolloseven Properties One Limited, a significant landowner and developer in Drogheda and sets out the following points for consideration when preparing the new Plan:

Provision of Housing and the role of Drogheda:



Drogheda sits at the top of the Settlement Hierarchy and is a designated Regional Growth Centre as per the NPF.

The National Planning Framework (NPF) Implementation: Housing Growth Requirements (July 2025) now requires Louth County Council to plan for 1,677 new homes per annum to 2034, significantly above the previous target. With the required headroom of 50%, the provision of lands shall accommodate 2,516 units per annum to 2034.

According to the Issues Paper, the housing stock in the county has increased on average 573 per annum between 2016-2022. This figure has improved between 2022 and the present day with 1,873 units completed in Drogheda alone between the end of 2021 to Q2 (Source: CSO).

National Policy Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Current Position for Drogheda – Baseline Assessment

Drogheda is a Regional Growth Centre and there is a focus on supporting the continued development of the town, functioning as a driver for regional growth along the Dublin-Belfast Economic Corridor.

The current CDP seeks to facilitate the continued expansion and growth of the town based on principles of balanced and sustainable development that enables the creation of employment and economic investment. Drogheda has delivered housing as intended and the submitter has made a very significant contribution to the target population with the development of the Seven Winds housing scheme at North Road, Drogheda.

Currently the CDP, along with the northern environs area of Drogheda, zoned 22 sites for housing development. Of these:

- 3 are existing sports grounds and unlikely to deliver housing in the short-term.
- 2 are awaiting planning decisions and may deliver a total of 90 units only.
- 5 sites have had no applications submitted since 2021 and should be discounted in terms of short-term delivery potential.
- 4 sites are owned by Louth County Council, with construction commenced on only two of the sites.
- 2 sites have planning permission for over two years but have not commenced.
- 3 privately owned sites are under construction but have no further capacity to deliver beyond current phases.
- 3 sites are fully developed with no further capacity available.

Apart from the northern environs, smaller sites zoned for residential development in Drogheda are not making a significant contribution to housing delivery. If Drogheda continues to grow, it will be necessary to identify new residential opportunity sites and opportunities for infill development on lands that are accessible to roads and services should be considered.

Required Response / Submission

The submission suggests that Drogheda's housing target (2,447 households from 2021-2027 i.e. 400 per year) should be increased.

The current core strategy allots 37.5% of the entire household allocation to Drogheda (2,447 out of 6,524 units). If this allocation is applied proportionately to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom, Drogheda should be targeting delivery of at least 943 units per annum for the next 10 years. This generates a requirement over the next decade for approximately 270ha of land zoned for Residential development (assuming a delivery density of 35 dwellings per ha). Any increase in the quantum of zoned land should be consistent with the Minister's direction to the Chief Executive, Drogheda's designation as a Regional Growth Centre and strategic location on Dublin-Belfast Economic Corridor, the need to support revitalisation



through critical mass in population and the NPF objectives for compact growth, regeneration and infrastructure and plan-led development.

The submission sets out that all options for the delivery of housing within the built-up area of the town should be considered when determining where new residential development should occur. All vacant, undeveloped plots should be assessed for residential development regardless of their current zoning.

We would encourage a proactive approach with respect to identification of suitable lands and with a view to aligning local delivery mechanisms with national objectives thus ensuring a sustainable, serviced, and plan-led housing strategy for Drogheda.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of Drogheda as a Regional Growth Centre along with Dundalk. The importance of its strategic location along the Dublin-Belfast Economic Corridor will continue to drive growth and the Draft Plan will seek to support the continued growth of the town in a sustainable manner.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a ‘Settlement Capacity Audit’ to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the ‘NPF Implementation Housing Growth Requirement Guidelines’ into the Core Strategy of the Draft Plan.

To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

To include relevant policy objective(s) to continue to support the growth and expansion of Drogheda, as a designated Regional Growth Centre, in a sustainable manner.

To review all existing lands zoned for residential use to take account of current land uses, with consideration being given to the likelihood of housing being delivered on said lands.



Submission Ref. No:

LH-C144-DPIP-103

Submitted By:

Brady Hughes Consulting on behalf of Propchain Solutions and The Sands Family

Summary of Main Issues Raised:

The submission is made on behalf of Propchain Solutions and The Sands Family, a significant landowner and developer in Drogheda and sets out the following points for consideration when preparing the new Development Plan for County Louth:

Provision of Housing and the role of Drogheda:

Drogheda sits at the top of the Settlement Hierarchy and is a designated Regional Growth Centre as per the NPF. The National Planning Framework (NPF) Implementation: Housing Growth Requirements (July 2025) now requires Louth County Council to plan for 1,677 new homes per annum to 2034, significantly above the previous target. With the required headroom of 50%, the provision of lands shall accommodate 2,516 units per annum to 2034.

According to the Issues Paper, the housing stock in the county has increased on average 573 per annum between 2016-2022. This figure has improved between 2022 and the present day with 1,873 units completed in Drogheda alone between the end of 2021 to Q2 (Source: CSO).

Policy and Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Current Position for Drogheda – Baseline Assessment

Drogheda is a Regional Growth Centre and there is a focus on supporting the continued development of the town, functioning as a driver for regional growth along the Dublin-Belfast Economic Corridor.

The current CDP seeks to facilitate the continued expansion and growth of the town based on principles of balanced and sustainable development that enables the creation of employment and economic investment. Drogheda has delivered housing as intended and the submitter has made a very significant contribution to the target population with the development of Ellwood, Ballymakenny View and Fitzgerald Gardens on the Ballymakenny Road, Drogheda and has also secure planning permission for shops, office space and medical facilities on the Ballymakenny Road.

Required Response / Submission

The submission suggests that Drogheda's housing target (2,447 households from 2021-2027 i.e. 400 per year) should be increased.

The current core strategy allots 37.5% of the entire household allocation to Drogheda (2,447 out of 6,524 units). If this allocation is applied proportionately to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom, Drogheda should be targeting delivery of at least 943 units per annum for the next 10 years. This generates a requirement over the next decade for approximately 270ha of land zoned for Residential development (assuming a delivery density of 35 dwellings per ha).

The area of the north Drogheda environs measures 253ha and is approximately 40% built out. The remaining lands in the north Drogheda area cannot deliver the scale of housing required in Drogheda over the next 10 years. Planning authorities must consider the longer-term housing requirements in the short-term, given the imminent move to 10-year development plans.

There are considerable landholdings in the north Drogheda area that have shown little to no interest in being



development and while residential zoning should remain on all of these lands, they cannot be relieved upon to deliver to housing targets or be allowed to hold up the delivery of alternative sites. Any increase in the quantum of zoned land should be consistent with:

The Minister's direction to the Chief Executive, Drogheda's designation as a Regional Growth Centre and strategic location on Dublin-Belfast Economic Corridor, the need to support revitalisation through critical mass in population and the NPF objectives for compact growth, regeneration and infrastructure and plan-led development.

The Revised NPF provides specific guidance on the growth of Drogheda including focusing development along the Dublin-Belfast Economic Corridor and the delivery of additional housing. Consideration must be given to extending the settlement boundary of Drogheda north of the PANCR to cater for the anticipated growth.

We would encourage a proactive approach with respect to identification of suitable lands and with a view to aligning local delivery mechanisms with national objectives thus ensuring a sustainable, serviced, and plan-led housing strategy for Drogheda to 2040. If this means that the settlement boundary for Drogheda would need to be extended, as would seem to be the case, it is suggested that the new CDP at least reserve the necessary lands to meet the NPF Implementation requirements to 2040 as Strategic Reserve and to zone those lands closest to the existing PANCR access points and associated infrastructure for residential purposes now.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of Drogheda as a Regional Growth Centre along with Dundalk. The importance of its strategic location along the Dublin-Belfast Economic Corridor will continue to drive growth and the Draft Plan will seek to support the continued growth of the town in a sustainable manner to achieve its potential.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

The submission sets out that the growth strategy should be longer-term given the imminent move to 10-year development plans. The Planning and Development Act 2024 was signed into law in October 2024. Chapter 5 of Part 3 of the Planning and Development Act 2024 details the statutory process for the preparation and making of a Development Plan and the information required to be included in same. Under this legislation, the duration of a Development Plan would be 10 years. It is acknowledged that under the provisions in Part 3 of the 2024



Planning and Development Act that the lifetime of Development Plans will be 10 years. However, this Development Plan is being prepared under the 2000 Act (as amended) and therefore will have a life of 6 years. Headroom of up to 50% will be factored into the calculation for the quantum of residential lands required to meet the housing growth requirements for the County during the lifetime of the Plan. This quantum of headroom is allowed for in the NPF Implementation Housing Growth Requirements Guidelines published in July 2025.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the ‘NPF Implementation Housing Growth Requirement Guidelines’ into the Core Strategy of the Draft Plan.

To ensure there are sufficient lands available throughout the County and in particular the settlements designated for growth to meet the projected housing requirements identified for Louth in the Housing Growth Requirement Guidelines, which will be transposed into the Core Strategy of the County Development Plan.

To continue to promote the towns of Drogheda and Dundalk as Regional Growth Centres and provide a policy framework for the settlements to ensure they will be able to realise their economic and employment potential and develop into centres of scale that can facilitate population and economic growth.

Submission Ref. No:

LH-C144-DPIP-104

Submitted By:

Patrick Mongey

Map showing land subject to Submission:

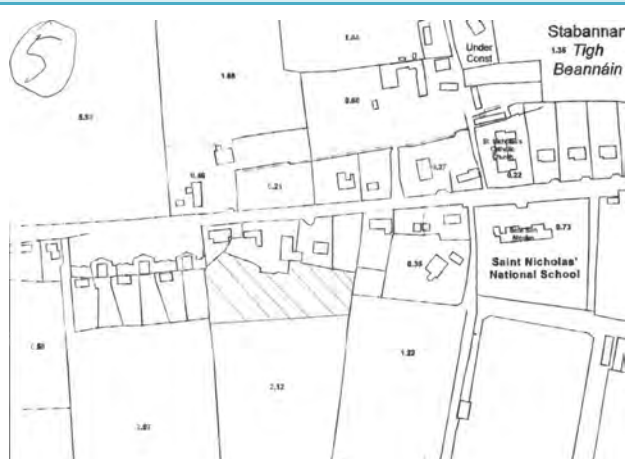


Figure 1: Map included as part of submission outlining the area subject of settlement boundary extension request.



Figure 2: Map included as part of submission illustrating the extent of lands in the ownership by the submitter.



Figure 3: Extract from Stabannon zoning map under the LCDP 2021-2027 to illustrate the location of the lands in the context of the settlement of Stabannon (lands subject of submission outlined in black for ease of reference).

Summary of Main Issues Raised:

The submission seeks to extend the settlement boundary of Stabannon to the extent outlined within Figure 1 & 3 above.

Chief Executive Opinion on Issues raised:

Note: This a similar submission to No. 15 which relates to the same lands and landowner.

The lands subject of this submission is currently outside of and immediately adjacent to the settlement boundary of Stabannon as shown in Figure 3 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2) (bc) of the Planning and Development Act 2000 (as amended) prevents zoning submissions from being considered at this stage of the process. Taking this into



account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in black in Figure 2 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-105

Submitted By:

Brady Hughes Consulting on behalf of Eugene Matthews

Summary of Main Issues Raised:

The submission sets out the following points for consideration when preparing the new Development Plan for County Louth:

Provision of Housing and the role of Dunleer:

Dunleer is a designated Self-Sustaining Growth Town along with Ardee and sits just below Drogheda and Dundalk. The NPF and regional strategies use the settlement hierarchy to direct growth in a balanced way. The designation of Dunleer signals that a local authority should plan for a level of job growth, service infrastructure and transport connectivity that supports its role.

Background and NPF Context

The National Planning Framework (NPF) Implementation: Housing Growth Requirements (July 2025) now requires Louth County Council to plan for 1,677 new homes per annum to 2034, significantly above the previous target. With the required headroom of 50%, the provision of lands shall accommodate 2,516 units per annum to 2034.

Policy and Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth’s County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Current Position for Dunleer – Baseline Assessment

The current CDP seeks to facilitate the continued growth of Dunleer based on principles of balanced and sustainable growth that enables the creation of employment and economic investment.

Dunleer has grown between 2016 and 2022 by over 17% but is underperforming when compared to the population increase target of 935 in the development plan (only 321 additional population in Dunleer with less than 2 years left of the current CDP).

There are only four sites currently zoned A2 New Residential Phase 1 within Dunleer. Of these, two are under construction for 70 and 35 no. dwellings respectively, while the other two have planning applications which are at further information stage (94no. dwellings) or recently granted (84no. dwellings).

Accordingly, if Dunleer is to continue to grow in accordance with national, regional and county level planning



policies, additional residential zoned lands will be required. The submission sets out that opportunities for additional development on lands that are contiguous to and sequential to the built-up area of the town and on lands with access to roads and services should be considered by the Planning Authority.

Required Response / Submission

The submission suggests that Dunleer's housing target (146 households from 2021-2027 i.e. 24 per year) should be increased.

The current core strategy allots just 2.2% of the entire household allocation to Dunleer (146 out of 6,524 units). If this allocation is applied proportionately to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom, Dunleer should be targeting delivery of at least 55 units per annum for the next 10 years. This generates a requirement over the next decade for approximately 22ha of land zoned for Residential development (assuming a delivery density of 25 dwellings per ha).

The zoning of more land would be consistent with the Minister's direction to the Chief Executive, the town's designation as a Self-Sustaining Growth Town and its strategic location on the M1 motorway, and the need to support revitalisation and regeneration of Dunleer town centre by achieving critical mass in population.

The new Plan should consider the following:

1. Be ambiguous with respect to housing delivery, proactively targeting delivery in towns like Dunleer that have established strong employment base and excellent connectivity along the Dublin-Belfast Economic Corridor.
2. Increase Dunleer's proportional allocation of population growth to match Ardee taking account of existing strong social and infrastructure capacity.
3. Bring more lands forward for residential development taking account of land ownership, capacity to deliver and likelihood of delivery when determining which lands to prioritise.
4. Any settlement boundary extension should be done in a way that delivers housing in areas that are sequential and logical.
5. Include an objective in the Plan for the reopening of the Dunleer rail link to provide local access to commuter services linking Dundalk and Dublin.

We would encourage a proactive approach with respect to identification of suitable lands and with a view to aligning local delivery mechanisms with national objectives thus ensuring a sustainable, serviced, and plan-led housing strategy for Dunleer.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of Dunleer as one of the main settlements in the county and the benefits of its strategic location.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be



required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

In relation to the reopening of the Dunleer rail link, while the final decision on rail services is made at a national level by agencies including the National Transport Authority, Iarnród Éireann, and the Department of Transport, the importance of continued investment and upgrades to rail infrastructure is recognised. This includes the re-opening of Dunleer rail station, and the Draft Plan will continue to provide policy support to examine the feasibility of the re-opening of the rail station in Dunleer.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the 'NPF Implementation Housing Growth Requirement Guidelines' into the Core Strategy of the Draft Plan.

To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

To include relevant policy objective(s) to examine the feasibility of the re-opening of the rail station in Dunleer.

Submission Ref. No:

LH-C144-DPIP-106

Submitted By:

Transport Infrastructure Ireland (TII)

Summary of Main Issues Raised:

1.0 Statutory Guidance and Government Policy

1.1 County Louth is served and traversed by essential motorway, national primary and secondary elements of the national roads network: the M/N1, N2, N33, N51, N52, and N53. Under the Trans-European Transport Network (TEN-T) the M/N1 is designated as part of the Core Network.

The EU TEN-T Regulations target the completion of a core network by 2030, of an extended core network by 2040 and of a comprehensive network by 2050.

The submission provides details regarding:

- Project Ireland 2040 - National Planning Framework (NPF) & National Development Plan 2021 – 2030 (NDP).
- The National Investment Framework for Transport in Ireland (NIFTI).
- The National Sustainable Mobility Policy.
- The Eastern Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy 2019 - 2031 (RSES).



TII Recommendation No. 1 Core Strategy Strategic Transport Considerations

TII would welcome consideration by the Council of the following:

Inclusion of a core strategy objective of the Draft Development Plan to reflect TII policy requirements:

- a) To maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements; and
- b) To ensure that the existing extensive strategic transport networks are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity for transport users.

Reasons have been provided for the inclusion of the strategy objective.

2.0 Development Strategy and Policy Requirements

TII seeks to ensure that the carrying capacity, operational efficiency, safety and national investment made in national roads in County Louth continue to be safeguarded.

TII requests that the Council consider the implications of land use policies on the strategic national roads network in the County as a criterion in determining the future land use zoning strategy.

2.1 National Roads Network Statutory Planning Policy

TII advise that the Draft Plan must be informed by national roads policy in the interests of the compatibility of the County's development strategy with the maintenance of the safe and efficient operation of the national roads network. TII reiterates that this is a vital Draft Plan consideration having regard to the omission of mention and identification of the national roads network in the Pre-Draft Strategic Issues Paper.

2.1.1 Management of Access to National Roads where a Speed Limit of outside urban speed limit zones

Spatial Planning and National Roads Guidelines for Planning Authorities section 2.5 states that development plans should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kmh apply. Developers should be advised of same at pre-planning stage.

Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be plan led, in consultation with and subject to the agreement of TII.

Engagement with TII is welcomed.

TII Recommendation No. 2 - Management of Access to National Roads outside urban speed limit zones

TII would welcome consideration by the for inclusion of a specific policy and / or objective in the Draft Plan:

To avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmph apply, in accordance with the requirements of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Reasons have been provided for policy and / or objective recommendations.

2.1.2 Development at National Roads Junctions

Proposals for development and land use zoning designations at national road interchanges and junctions require careful consideration and any proposals should be prepared in the context of the provisions of Section 2.7 of the *DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities*.

Draft Development Plan policies should safeguard the strategic role of the national road network and associated



junctions.

TII is available to assist the Council in preparing appropriate evidence-based transport assessments.

TII Recommendation No. 3 – Management of development at National Roads Junctions

TII would welcome consideration by the Council of the following Draft Plan policies / objectives:

(i) In accordance with Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), particular care must be exercised in the assessment and management of development proposals in the Development Plan relating to development objectives or the zoning of locations at, or close to junctions on the national road network which should be subject to an appropriate evidence-base in accordance with the provisions of official national roads policy.

(ii) In accordance with Chapter 2 of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), there are requirements to co-ordinate proposed land use zoning designations and / or access strategies in the Development Plan and accompanying settlement plans, as appropriate, with speed limits on national roads. Where large scale development in urban areas and / or areas adjoining national roads, including at major junctions and interchanges, is being considered Development Plans should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future by:

- *Ensuring such development is evidence based and supported by appropriate assessments of road capacity, junction structure and provision of suitable transport alternatives.*
- *Protecting undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements.*
- *Ensuring that capacity enhancements and or traffic management measures will be put in place to facilitate new development; and*
- *Improving operational efficiency of the regional and local road and transportation infrastructure – e.g. where appropriate, promoting new regional and local road networks and alternative modes.*

(iii) Any additional improvements relating to national roads identified at by Louth County Council should be done only in consultation with, and subject to the agreement of TII and be identified and assessed against an appropriate evidence base, in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), national policy investment priorities and TII Publications.

(iv) It is a policy of the Council to protect the capacity and strategic function of the national roads network and associated junctions, having regard to relevant Government policy, including the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

Reasons have been provided for policy and/or objective recommendations.

2.1.3 Land Use and Transport Integration in Urban Areas within urban speed limit zones

Development objectives pertaining to settlements should reflect the provisions of the *Spatial Planning and National Roads Guidelines for Planning Authorities*.

Planning authorities must develop an evidence-based approach to planning policy including compliance with national policy, technical requirements associated with TII Publications, appropriate transport assessment modelling and implementation requirements such as funding.

LTPs (Local Transport Plans) are required under RSES RPO 8.6 to be prepared for selected settlements including for Louth: Dundalk and Drogheda.

The Council is made aware of the TII Publication 'The Treatment of Transition Zones to Towns and Villages on



National Roads' that exists in addition to DMURS.

TII refers to Chapter 3 of the Spatial Planning and National Road Guidelines for Planning Authorities and expects that the Draft Plan will address the requirements for future development proposals related to noise amelioration, lighting, drainage requirements, and boundary protection and treatments relative to the national roads network.

TII Recommendation No. 4 – Managing National Roads Network Urban Interfaces

TII would welcome consideration by the Council of the following in the formulation of Draft Plan policies / objectives:

(i) That identified urban growth areas should be developed to avoid undermining the strategic transport function of national roads.

(ii) Within areas zoned for development adjacent to the national roads network, the planning authority should ensure that policies and / or objectives are drafted to address the amenity of future occupants of the land concerned and to protect the operation and safety of the existing national road network and associated infrastructure including by avoiding adverse amenity and environmental impacts from existing and future roads.

(iii) TII welcome collaboration with the Council alongside the NTA in the preparation of both settlement planning and Local Transport Plans.

(iv) Setting out an explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads / motorways reflecting policy outlined in the Retail Planning Guidelines.

(v) Referring to the requirements of Section 2.8 of the Spatial Planning and National Roads Guidelines for Planning Authorities, in relation to the provision of roadside service facilities on non-motorway national roads and their junctions.

Reasons have been provided for policy and/or objective recommendations

2.0 National Roads Network Policy - Compatibility of Infrastructure Networks

TII is supportive of proposals aiming to achieve the National Strategic Outcomes 2, 4, 8 and 9.

TII is supportive of renewable energy developments but recommends that a full assessment of all route alternatives for grid connection takes place. Cable routing should avoid all impacts to existing TII infrastructure. Attention is drawn to various circulars and guidance.

TII Recommendation No. 5 - National Roads Network protection compatibility with Infrastructure Networks

TII recognises the importance of co-ordination of the delivery and protection of critical infrastructure networks. TII would welcome consideration by the Council of the following in the formulation of Draft Plan policies / objectives:

(i) Seeking to provide for the delivery of utility networks should ensure such provisions have clear and due regard to the maintenance of the safe and efficient operation of the national roads network in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

(ii) Setting development management assessment considerations for the routing of high voltage cabling should be in accordance with the Interim Guidance and Electricity Transmission Infrastructure Development - Roads Sector Engagement Framework and any subsequent updated versions.

Reasons have been provided for objective and policy recommendations.

2.3 Maintaining the Strategic Capacity and Safety of the National Roads Network

The Council should appropriately manage interface with the national road network to safeguard the network



and associated infrastructure. Impacts and mitigation work that arise as a result of the plan review process due to location in proximity to the national roads network are to be assessed by planning authority in conjunction with TII.

Planning applications for significant development proposals should be accompanied with Traffic and Transport Assessment (TTA) to be carried out by suitably competent consultant.

TII Publications (Standards & Technical) Compliance

TII advises Draft Plan policies and objectives recognise the existence and compliance responsibilities for the design and delivery of projects impacting the national roads network under TII Publications.

TII Recommendation No. 6 - TII Publications (Standards & Technical) Compliance

TII would welcome consideration by the Council of the following in the formulation of Draft Plan policies / objectives:

(i) Related to transport and / or roads including development management guidance should advise of the requirement for demonstration of pre-development consent application compliance with relevant TII Publications in respect of development that will interact with the national roads network in addition to, or instead of DMURS.

(ii) Should specifically advise of requirement for Road Safety Audits

(iii) Should specifically reference TII's Traffic and Transport Assessment Guidelines.

Reasons have been provided for inclusion of reference to technical design and implementation standards.

2.4 National Roads Network Signage and Safeguarding Ancillary Infrastructure

Tourist & Leisure Signage on National Roads (TII, 2011) outlines TII's policy on the provision of tourist and leisure information signs on national roads. TII would further welcome a dedicated objective associated with safeguarding investment in the national road network relating to protection of national road drainage regimes. TII does not permit private connections to national road infrastructure, including that storm water drainage regime which is exclusive to the national road.

TII Recommendation No. 7 - Safeguarding National Roads Network Signage and Ancillary Infrastructure

TII would welcome consideration by the Council of the following in the formulation of Draft Plan policies / objectives:

(i) Related to signage should specifically recognise the national roads network and the requirement to observe Tourist & Leisure Signage on National Roads.

(ii) The capacity and efficiency of the national road network drainage regimes in Louth will be safeguarded for national road drainage purposes.

Reasons have been provided for objective and policy recommendations.

3. National Roads Network Projects - Enhancing Regional Accessibility and International Connectivity

3.1 Current NDP National Road Projects

TII in collaboration with the Council is developing/progressing national road schemes and improvements.

Currently County Louth is the location of national primary and secondary roads schemes identified in the 2021 - 2030 NDP; N2 Ardee to Castleblayney and the N53 Hackballscross to Rissan schemes as well as the N52 Ardee Bypass.

3.1.1 NDP Investment protection for National Roads Projects and Schemes.

Policies, and objectives or rezoning proposals should not compromise the road planning and route option



evaluation process, alter the function of these routes or increase the cost of land to be acquired or under active consideration as a route option for a national road scheme.

TII Recommendation No. 8 - National Roads Projects and Schemes

TII would welcome and recommend consideration by the Council of the following in the formulation of Draft Plan policies / objectives:

(i) That national road schemes should be included in the Draft Development Plan in accordance with Government National Development Plan (NDP) investment objectives.

(ii) To protect the study area, route corridor options and thereafter the preferred route corridor selected for national road schemes being progressed in the development plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery.

(iii) Text should be included in the Draft Plan to ensure that Appropriate Assessment of national road scheme planning is undertaken in accordance with the requirements of Article 6(3) and Article 6(4) of the Habitats Directive.

Reasons have been provided for objective, policy and text recommendations.

3.2 Non NDP Road and Other Transport Projects

LCC may consider it appropriate to identify local improvements to national roads and /or transport proposals over the plan period. TII is aware of the following current projects interacting with the national roads network; (i) Active Travel - N2 Ardee (South); and (ii) M1 Junction 16 Park & Share facility. Particular care should be taken in relation to proposals at/close to interchanges.

TII would welcome consideration by the Council of the following in the formulation of Draft Plan policies / objectives:

TII Recommendation No. 9 – Locally identified Development Objectives affecting the National Roads Network

(i) TII recommends any additional connectivity to national roads should be developed in accordance with the requirements of Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

(ii) Any additional improvements relating to national roads identified at by Louth County Council should be done only in consultation with, and subject to the agreement of TII and be identified and assessed against an appropriate evidence base, in accordance with the requirements of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

Reasons have been provided for inclusion of development objectives affecting national roads.

Greenways and National Cycle Network (NCN)

Proposals for Greenways or cycle Network Plans should be consulted with the Active Travel Section of Louth County Council.

Chief Executive Opinion on Issues raised:

The Chief Executive acknowledges the importance of the national road network in providing connectivity between population centres and the main centres of employment and the key ports and airports which are the main points of entry and exit to the country. Policies to safeguard the capacity of national routes that will allow them to continue to perform their strategic role will be included in the Draft Plan.

In relation to the location of future employment and residential areas, the Draft Plan will be in accordance with national and regional policy whereby future growth and development will be primarily concentrated in the



Regional Growth Centres of Dundalk and Drogheda. Development in these centres will be directed towards centrally located areas that will support the creation of consolidated and compact settlements.

To formulate policies having regard to National Planning Framework & The Regional Spatial and Economic Strategy for the Integration of land Use and transport planning.

Any policies in the Plan relating to motorway interchanges will have regard to the Spatial Planning and National Roads, Guidelines for Planning Authorities (2012).

In relation to developments that would generate significant volumes of traffic the Draft Plan will include a policy requiring the preparation of a traffic and transport assessment with such applications which would allow a detailed analysis of the potential impact of the development on the local road network.

The Draft Plan will also include reference to service areas, signage, and noise as required by the Spatial Planning and National Roads, Guidelines for Planning Authorities.

Chief Executive Recommendation:

To consult with TII on policy wording relating to national roads in respect of land use planning.

To maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements; and to ensure that the existing extensive strategic transport networks are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity for transport users.

To include policies that provide for the protection, maintenance, and upgrades to the national road network that have regard to national and regional policy and guidance and to support sustainable transport and improvements in connectivity and permeability.

To have regard to policies in the Draft Plan which align with Spatial Planning and National Roads, Guidelines for Planning Authorities (2012).

To aim to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kmh apply.

To include a policy requiring the preparation of a traffic and transport assessment for large developments generating a significant volume of traffic which would allow for a detailed analysis of the potential impact of the development on the local road network.

To include supporting policy and text in the Draft Plan supporting the delivery of national road schemes.

Submission Ref. No:

LH-C144-DPIP-107

Submitted By:

Michael Carr

Summary of Main Issues Raised:

The submission relates to access onto National and Regional Roads and the associated restrictions on modified entrances onto Protected Regional Routes, specifically the R168 between Drogheda and Tullyallen.

Planning permission (Ref. 21/1419) proposed to create a safe, low-impact entrance from the R168 to enable the dwelling's restoration (existing laneway has become obstructed). The application was refused primarily under restriction to new accesses to protected regional roads. The development does not result in traffic



intensification.

Having regard to Housing for All (2021), Town Centre First (2022) and the Vacant Homes Action Plan (2023), it is proposed that the forthcoming County Development Plan includes a discretionary provision that would allow the Planning Authority to permit new or replacement accesses to Protected Regional Routes including the R168, where:

- No reasonable alternative access exists; and
- The development involves the reuse or renovation of an existing or derelict dwelling.

This would allow flexibility rather than leave a property derelict indefinitely and would support the Council's sustainability, heritage, and vacancy reduction objectives. Additional information can be provided if required.

Chief Executive Opinion on Issues raised:

In order to maintain the efficiency and functionality of the national and regional road network it is important that the number of new accesses and the intensification of existing accesses are restricted. Such restrictions protect investments in the road network and ensure these roads continue to provide an important function in maintaining economic competitiveness.

The current exemptions for new entrances onto national and regional roads will be reviewed as part of the preparation of the Draft Plan in consultation with the Transport Engineers in the Council.

Chief Executive Recommendation:

To continue to support the protection of the national and regional road network by restricting new accesses onto national and regional roads and to review the current exemptions as set out in Tables 7.9 and 7.10 of the 2021-2027 County Development Plan.

Submission Ref. No:

LH-C144-DPIP-108

Submitted By:

Brady Hughes Consulting on behalf of Barney Flannery

Summary of Main Issues Raised:

The submission is made on behalf of Barney Flannery, a significant landowner and longstanding business operator in Drogheda and sets out the following points for consideration when preparing the new Development Plan for County Louth:

Provision of Housing and the role of Drogheda:

Drogheda sits at the top of the Settlement Hierarchy and is a designated Regional Growth Centre as per the NPF. The National Planning Framework (NPF) Implementation: Housing Growth Requirements (July 2025) now requires Louth County Council to plan for 1,677 new homes per annum to 2034, significantly above the previous target. With the required headroom of 50%, the provision of lands shall accommodate 2,516 units per annum to 2034.

According to the Issues Paper, the housing stock in the county has increased on average 573 per annum between 2016-2022. This figure has improved between 2022 and the present day with 1,873 units completed in



Drogheda alone between the end of 2021 to Q2 (Source: CSO).

Policy and Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Current Position for Drogheda – Baseline Assessment

Drogheda is a Regional Growth Centre and there is a focus on supporting the continued development of the town, functioning as a driver for regional growth along the Dublin-Belfast Economic Corridor.

The current CDP seeks to facilitate the continued expansion and growth of the town based on principles of balanced and sustainable development that enables the creation of employment and economic investment.

Currently the CDP, along with the northern environs area of Drogheda, zoned 22 sites for housing development. Of these:

- 3 are existing sports grounds and unlikely to deliver housing in the short-term.
- 2 are awaiting planning decisions and may deliver a total of 90 units only.
- 5 sites have had no applications submitted since 2021 and should be discounted in terms of short-term delivery potential.
- 4 sites are owned by Louth County Council, with construction commenced on only two of the sites.
- 2 sites have planning permission for over two years but have not commenced.
- 3 privately owned sites are under construction but have no further capacity to deliver beyond current phases.
- 3 sites are fully developed with no further capacity available.

Apart from the northern environs, smaller sites zoned for residential development in Drogheda are not making a significant contribution to housing delivery. If Drogheda continues to grow, it will be necessary to identify new residential opportunity sites.

Required Response/Suggested Action

The submission suggests that Drogheda's housing target (2,447 households from 2021-2027 i.e. 400 per year) should be increased.

The current core strategy allots 37.5% of the entire household allocation to Drogheda (2,447 out of 6,524 units). If this allocation is applied proportionately to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom, Drogheda should be targeting delivery of at least 943 units per annum for the next 10 years. This generates a requirement over the next decade for approximately 270ha of land zoned for Residential development (assuming a delivery density of 35 dwellings per ha). Any increase in the quantum of zoned land should be consistent with the Minister's direction to the Chief Executive, Drogheda's designation as a Regional Growth Centre and strategic location on Dublin-Belfast Economic Corridor, the need to support revitalisation through critical mass in population and the NPF objectives for compact growth, regeneration and infrastructure and plan-led development.

The submission sets out that all options for the delivery of housing within the built-up area of the town should be considered when determining where new residential development should occur. All vacant, undeveloped plots should be assessed for residential development regardless of their current zoning.

We would encourage a proactive approach with respect to identification of suitable lands and with a view to aligning local delivery mechanisms with national objectives thus ensuring a sustainable, serviced, and plan-led housing strategy for Drogheda.



Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of Drogheda as a Regional Growth Centre along with Dundalk. The importance of its strategic location along the Dublin-Belfast Economic Corridor will continue to drive growth and the Draft Plan will seek to support the continued growth of the town in a sustainable manner to achieve its potential.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a ‘Settlement Capacity Audit’ to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the ‘NPF Implementation Housing Growth Requirement Guidelines’ into the Core Strategy of the Draft Plan.

To ensure there are sufficient lands available throughout the County and in particular the settlements designated for growth to meet the projected housing requirements identified for Louth in the Housing Growth Requirement Guidelines, which will be transposed into the Core Strategy of the County Development Plan.

To continue to promote the towns of Drogheda and Dundalk as Regional Growth Centres and provide a policy framework for the settlements to ensure they will be able to realise their economic and employment potential and develop into centres of scale that can facilitate population and economic growth.

To review all existing lands zoned for residential use to take account of current land uses, with consideration being given to the likelihood of housing being delivered on said lands.

Submission Ref. No:

LH-C144-DPIP-109

Submitted By:

Michael Cannon for and on behalf of Groveview Builders Ltd

Map showing land subject to Submission:

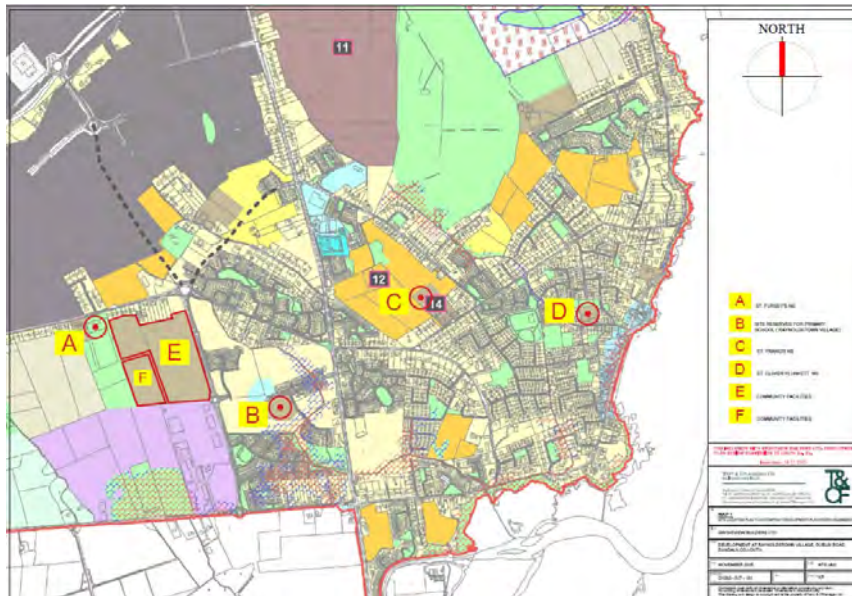


Figure 1: Map included as part of submission.

Summary of Main Issues Raised:

Introduction

Groveview Builders Ltd are constructing a residential and mixed-use project in Haggardstown/ Haynestown.

Education

There is a need to strategically assess education provision as it relates to new schools in Dundalk and how it relates to the allocation of other land uses especially housing for which there is an unprecedented demand.

There are three primary schools in the southern suburbs of the town: St Fursey's NS (Marlbog Road), St Francis NS (Rock Road) and St Oliver Plunkett NS (Sandy Lane) but no post primary school.

When the current County Development Plan was on public display, the Department of Education outlined the overall school requirements for Dundalk, as two new primary schools and one new post primary school. This was then included (Section 4.10) as part of the adopted County Plan, that also outlined the identification and reservation of appropriate sites was to be explored as part of the preparation of the Dundalk LAP.

Table 5.4 of Section 5.18.1, of the Dundalk Local Area Plan 2025-2031 shows Haynestown in the southern suburbs of the town as the location for the post primary school and one of the primary schools (with the other national school allocated to serve the Mount Avenue Development Area). Alongside the 'Community Facilities' zoning a substantial area (c1ha) of undeveloped land immediately to the rear of St. Frances NS was zoned to allow for its expansion.

The same designation was once again given to the c3.4ha of open land on the western side of the WIR that sits opposite Raynoldstown Village to which the LAP added over 9ha. Along with the same zoning for the 1.3ha



reserved site in Raynoldstown Village.

The Community Facilities zoning of land on western side of the WIR is of a size that can accommodate a primary school and a post primary school, and the Council has now complied with Policy Objective SC 27. The retention of the Raynoldstown Village reserved school site is now redundant.

Chief Executive Opinion on Issues raised:

The Chief Executive will continue to work in collaboration with the Department of Education and Youth to identify suitable location of schools/extension of schools. Notwithstanding this, the purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the new Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this submission at this stage.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-112

Submitted By:

Destrina Ltd

Map showing land subject to Submission:



Figure 1: Aerial image of the lands included as part of the submission. For ease of reference, the lands subject of the submission are outlined in yellow (not to scale) and the settlement boundary of Collon as per the LCDP 2021-2027 is outlined in red.

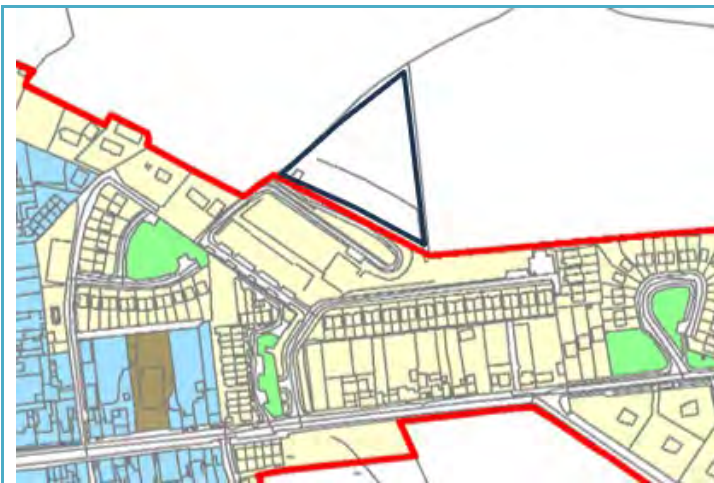


Figure 2: Extract from Collon zoning map under the LCDP 2021-2027 to illustrate the location of the lands in the context of the settlement of Collon (lands outlined in black for ease of reference - not to scale).

Summary of Main Issues Raised:

The submission seeks to have the settlement boundary of Collon extended to the north to include an area of land c. 0.8ha and the associated zoning of these lands to Residential.

The submission sets out the following rationale for the settlement boundary extension and rezoning request:

- History of residential permissions granted on the lands: 06/448, 16/937 (expired March 2022) of which the following works were carried out, and which can be partially seen in the aerial photograph in Figure 1 above:
 - Site roadway, all required excavations and gabion walls constructed.
 - Road kerbing and road sub-base.
 - Main foul and storm drainage services and underground storm attenuation tanks installed.
 - Large portion of site service ductwork and watermain in place.
 - Sub-structure of one of the residential blocks in place.
- Site was taken under control of NAMA which prevented the completion of the site.
- Destrina Ltd regained control of the site and made an application for an Extension of Duration in January 2021 however this was refused.
- Destrina Ltd have had a pre-planning meeting with Louth County Council in relation to a new planning application for the site (the submission includes a Site Layout Plan for Phase 1 & 2 proposals at the site).

Chief Executive Opinion on Issues raised:

The lands subject to this submission are currently outside of and immediately adjacent to the settlement boundary of Collon as shown in both Figure 1 & 2 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into



account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in black in Figure 2 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-113

Submitted By:

Genesis Planning Consultants on behalf of Moffett Investments

Summary of Main Issues Raised:

Background to Moffett Investments provided and projects listed. Submission is focused on core strategy, settlement approach for Dundalk and housing delivery in the town.

Background and Context

Under the Revised NPF and accompanying Section 28 Guidelines ‘NPF Implementation Housing Growth Requirements’ there is provision for Louth to be allocated an uplift in housing and population growth. Three key objectives from the Section 28 guidelines are outlined. Submission states that the CDP should be providing for 2,516 housing units per annum in the County, as a minimum, and a further increase in zoning for residential lands at locations which are appropriate.

Ten Year Development Plan Scenario

When Part 3 of the Act of 2024 comes into effect, planning authorities will be required to prepare development plans that have a 10-year lifespan. The corresponding quantum of zoned lands should also be increased accordingly. Given the longer timescale it is appropriate for lands to be zoned even in a scenario where there may be infrastructure constraints.

Development Plans – Guidelines for Planning Authorities (July 2022)

Development Plan Guidelines (DPGs) advocate that it may be necessary to zone more serviced land and sites for residential (or mix of residential) than required to meet precisely the projected housing demand to avoid restricting the supply of new housing and provide a degree of choice. The purpose of the planning system is not to facilitate land hoarding and speculation of serviced land.

Dundalk and the need for Housing

Having regard to Dundalk’s location along the Dublin-Belfast Economic Corridor and its significant employment base, the town provides an ideal location for delivery of additional housing.

Summary and Conclusion

The emerging 2027-2033 Louth CDP should:

- Factor in a 10-year scenario in zoning lands.
- Consider the current lack of zoned lands for housing in the town.



- Consider the acute shortage of homes available in the town.
- Consider the reality that existing lands zoned for housing are not being developed.
- Consider that Dundalk is ideally located and serviced to cater for delivery of housing.
- Avoiding a Core Strategy or Housing Needs Demand Assessment based on historical population growth forecasts.
- Adopt an approach to zoning adequate lands for housing along with headroom in accordance with the Section 28 Guidelines 'NPF Implementation Housing Growth Requirements' and also the 'Development Plan Guidelines'.

Chief Executive Opinion on Issues raised:

The Planning and Development Act 2024 was signed into law in October 2024. Chapter 5 of Part 3 of this Act details the statutory process of the preparation and making of a Development Plan and the information required to be included in same.

It is acknowledged that under the provisions in Part 3 of the 2024 Planning and Development Act the lifetime of Development Plans will be 10 years however this Development Plan is being prepared under the 2000 Act (as amended) and therefore will have a life of 6 years. Headroom of up to 50% will be factored into the calculation for the quantum of residential lands required to meet the housing growth requirements for the County during the lifetime of the Plan. This quantum of headroom is allowed for in the NPF Implementation Housing Growth Requirements Guidelines published in July 2025.

The Draft Plan will promote the towns of Dundalk and Drogheda as Regional Growth Centres, as designated by both National and Regional policy, alongside promoting their strategic location along the Dublin-Belfast Economic Corridor.

When zoning residential land regard shall be had to 'Development Plans - Guidelines for Planning Authorities' (July 2022) or any updated guidelines. And any other relevant Guidelines published under Section 28 of the Planning and Development Act 2000 (as amended) including the 'NPF Implementation Housing Growth Requirements' thereby ensuring there is sufficient zoned land in Dundalk to meet the New Annual Housing Growth Requirements.

Chief Executive Recommendation:

To continue to promote the towns of Dundalk and Drogheda as Regional Growth Centres and provide a policy framework for the settlements to ensure they will be able to realise their economic and employment potential and develop into centres of scale that can facilitate population and economic growth.

To ensure there are sufficient lands available throughout the County and in particular the settlements designated for growth to meet the projected housing requirements identified for Louth in the Housing Growth Requirement Guidelines, which will be transposed into the Core Strategy of the County Development Plan.



Submission Ref. No:

LH-C144-DPIP-116

(refer to 171)

Submitted By:

Shrewsbury Manor Residents

Summary of Main Issues Raised:

The submission is made on behalf of residents of Shrewsbury Manor and neighbouring residents, and the submitter has consulted with Our Lady's College, Greenhills. The submission seeks to raise urgent concerns regarding road safety along the L2307 road.

Traffic volumes have increased significantly over the past five years and with the increase in residential housing on the north side of Drogheda as well as the opening of the northern cross route, this road has become a busy link road at all times of the day and night.

The narrow width of the footpath from the estate to the Newtown link road forces pedestrians to step onto the road and there is no footpath on the opposite the Cord Road.

Insufficient parking during school drop-off/collection times resulting in congestion and blocking access for residents of Shrewsbury Manor.

Additional concerns include:

- Insufficient signage to indicate the presence of school, no traffic calming measures and the existing markings are obscured.
- No speed ramps on the hill from Newtown junction leading to the school to slow traffic
- Numerous large housing developments nearing completion without any upgrades to footpaths or roads
- Historic maps (as early as 1830) indicate the road has no changed however there has been significant growth and development increasing traffic in the area.

The submission proposed that a cycle lane and footpath should continue from the planned roundabout at the end of the Northern Cross Route up to the school. This would create a much safer access route. Furthermore, if parents can access and egress via both the Baltray Road and L2307, this would alleviate traffic congestion.

The submission requests that the following is considered:

- Our Lady's College is willing to consult with the Council to ensure these measures are implemented.
- Would like the option to open an entrance on the Baltray Road.
- Would like a pedestrian access opposite the Newtown Link Road.
- Would like the Council to consider the planning application for high density housing adjacent to the school which has plans for only one entrance at the Newtown link. This will further increase traffic.
- The school has worked hard to develop the sports facilities over the years and is an asset to the community all year round. Safe access is required day and night.
- For the school and future residents on the Newtown Road, a safe route to walk and use mobility aids is required.

Chief Executive Opinion on Issues raised:

The Chief Executive notes the concerns set out within the submission in relation to road safety and traffic congestion along the L2307, particularly in proximity to Shrewsbury Manor and Our Lady's College. While the provision of road signage and traffic calming measures is an operational issue outside of the scope of the Development Plan process, the current Development Plan includes a policy objective in support of investment and improvements to public road infrastructure (MOV 47) and the Draft Plan will continue to provide support



for road improvements in the County.

A Local Transport Plan is currently being prepared for Drogheda. This Transport Plan will identify potential projects that will promote active travel and improve pedestrian and cycling infrastructure in the town. The Draft Development Plan will support the progression and implementation of such projects included in the Local Transport Plan for Drogheda. In addition, the Draft Plan will include policy support for the implementation of the Safe Routes to School Programme and other sustainable transport initiatives developed by schools.

The delivery of the remaining sections of the Port Access Northern Cross Road (PANCR) will be a strategic objective of the Plan. The dual benefits of this road in improving connectivity and removing HGV traffic from the town centre are recognised.

In relation to the request in the submission to consider an additional entrance from Our Lady's School onto the Baltray Road, provision of a pedestrian entrance opposite Newtown link and consideration of a planning application for residential development which is proposing one entrance, these are all matters for the Development Management Section. Nonetheless, the Draft Plan will continue to support improved permeability and connectivity.

Chief Executive Recommendation:

To continue to provide a policy objective to support investment and improvements to the public road infrastructure in the County.

To include policy objectives in the Draft Plan that support improvements to connectivity and permeability and the implementation of active travel measures to provide increased opportunities for more sustainable forms of transport including walking and cycling.

To include policies that support the implementation of Safe Routes to Schools Infrastructure to make walking and cycling to school a safer option for students and families.

Submission Ref. No:

LH-C144-DPIP-129

Submitted By:

Cllr Robert Nash

Summary of Main Issues Raised:

Over the last 20 years the overdevelopment of Blackrock and Haggardstown and lack of investment in public services has left a shortage of childcare services, education facilities, healthcare and community facilities as well as green space. Any future development must be done with clear guidance from Louth County Council through planning conditions that such services must be put in place to cater for current and future increased demand.

There is also a clear need for a public transport link from Haggardstown to Dundalk town centre and in consultation with the National transport authority, lands need to be identified for a satellite bus station which along with servicing Dundalk, could also service Blackrock village and ease parking shortages.

Although land has been identified for a new school in Blackrock/Haggardstown, progress has been slow and the construction on new education facilities in this area needs to be expedited to relieve traffic congestion at Hill Street bridge and Inner Relief Road.

Active travel projects must coincide with investment in public transport services and facilities, if we really want to see a reduction on the amount of cars commuting in and out of town.



Chief Executive Opinion on Issues raised:

The importance of community, recreation and sports facilities in the creation of sustainable, walkable and socially inclusive neighbourhoods is acknowledged. A Social Infrastructure Audit was carried out as part of the review of the Dundalk Local Area Plan; this will also inform the new County Development Plan. An analysis of all land use zonings will also be carried out in the preparation of the new Plan, and the Council will investigate the possibility of zoning additional lands 'G1 Community Facilities' or 'H1 Open Space' where a need is identified.

Currently under the Louth County Development Plan 2021-2027, Policy Objective SC11 requires that all new residential applications on lands greater than 1ha or for 100units or more submit a Community, Social and Cultural Infrastructure Audit to determine if community facilities in the area are sufficient to provide for all future residents and where deficiencies are identified. Similar policy provision may apply following the audit study.

The Dundalk Local Transport Plan (LTP) has identified a number of new routes and service functions for public transport within the county and wider Blackrock/Haggardstown Area. Active travel routes were also examined, with the LTP seeking a modal shift from the motor vehicle to walking and wheeling. The findings of this report will again be reviewed at time of writing the Plan and may be subject to amendments following up-to-date information from partners (Bus Eireann, Council's Infrastructure department, TII, Irish Rail).

The provision of land zoning and relevant policy objectives have been included in the Dundalk LAP for a new school at Blackrock/Haggardstown. The progress of such will be reviewed at time of writing the plan and may be subject to amendments following up-to-date information from the Department of Education.

Chief Executive Recommendation:

To continue to support the creation of a sustainable community in Blackrock and the provision of social and community facilities to meet the requirements of the existing and future population and to support the progression and implementation of projects in the Local Transport Plan for Dundalk including improved public transport provision.

Submission Ref. No:

LH-C144-DPIP-134

Submitted By:

Cllr Robert Nash

Summary of Main Issues Raised:

The submission sets out that a greenway from Soldier's Point to Blackrock is more viable than the Carlingford design model. Much of the land from Soldier's Point to Blackrock is already state owned and compensation would be minimal.

Any future flood defence design model in the Dundalk Flood Relief Scheme should be designed to complement the construction of a greenway on this route in the future.

Chief Executive Opinion on Issues raised:

Project Ireland 2040 which comprises the National Planning Framework (NPF) 2040 and the National Development Plan sets out the overall national objectives.

Greenways are specifically mentioned in the NPF as a means of achieving enhanced amenities in rural areas



which would promote activity-based tourism. There is a specific national policy objective which seeks to facilitate tourism development and develop national greenways.

Corridor 5 of the National Cycle Network is a planned coastal route connecting Dundalk to Wexford, integrating existing and future greenways along the coast. Key sections include the Dundalk to Drogheda Greenway (incorporating projects in Blackrock and Baltray) and the extension of the Boyne Greenway to Mornington. The development is part of the broader CycleConnects plan by the National Transport Authority (NTA) to create a comprehensive network across Ireland.

In County Louth it is the Council's Strategic objective to 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 e.g. Great Eastern Greenway, Louth Coastal Way. Dundalk to Sligo Greenway and the Boyne Greenways. Policy Objective MOV 32 of the 2021-2027 CDP seeks to plan and develop a Louth Coastal Way along the east coast.

The Council considers that Greenways are essential pieces of infrastructure and considers that Greenways provide a valuable recreational amenity that promotes an active and healthy lifestyle and are important tourism assets. The Council's own Corporate Plan includes Strategic Objectives that promote the delivery of Greenways and recreational facilities policies that support Strategic Economic Development programmes like tourism.

The Dundalk-Blackrock Flood Relief Scheme is currently at the preliminary design stage and is being advanced in partnership with the Council and the OPW. The feasibility of incorporating a greenway into the design of the flood defences will be considered as part of the design of the flood relief scheme. This is a separate process to the preparation of the Development Plan.

The Dundalk Flood Defence scheme is noted in the LCAP 2024 – 2029 and is a development objective of the current Louth County Development plan. The Council will engage with OPW to reach agreement upon timeline for its construction. The design and implementation of flood risk defences for use as greenways is a matter for the Operations section of the Council and the OPW.

Chief Executive Recommendation:

To advance and deliver the Louth Coastal Way in consultation with the public and statutory agencies to ensure that the Strategic objectives of the National Planning framework can be delivered. The implementation of these strategic objectives will ensure that the creation of a Louth Coastal Way is developed as a valuable recreational amenity which promotes an active and healthy lifestyle and which are key important tourism assets in a sustainable environmental manner.

Submission Ref. No:

LH-C144-DPIP-136

Submitted By:

Cllr Robert Nash

Summary of Main Issues Raised:

The submission seeks a feasibility study to be undertaken to determine the need for a community centre in the Bay Estate/Point Road/Red Barns Road area and for lands to be designated for the design of same.

The submission sets out that there are only two community centres in Dundalk town which serve Muirhevnamore and Cox's Demesne housing estates and there is a clear need for a new community centre in the area to serve both the young and older generations.



There is also a clear need for a playground in this area.

Chief Executive Opinion on Issues raised:

The importance of community, recreation and sports facilities in the creation of sustainable, walkable and socially inclusive neighbourhoods is acknowledged. A Social Infrastructure Audit was prepared for Dundalk as part of the preparation of the 2025-2031 Local Area Plan for the town; this will also inform the new County Development Plan. An analysis of all land use zonings will also be carried out in the preparation of the new Plan, and the Council will investigate the possibility of zoning additional lands 'G1 Community Facilities' or 'H1 Open Space' where a need is identified.

Chief Executive Recommendation:

Carry out a review of all land use zonings and if considered necessary additional land will be zoned for recreation and/or community purposes. The Policy Objectives contained in the new Plan will continue to support the provision of community and recreation facilities.

Submission Ref. No:

LH-C144-DPIP-144

Submitted By:

Joe Douglas

Summary of Main Issues Raised:

The submission relates to the car-dependent nature of Drogheda, traffic congestion, decaying town centre and poor-quality public spaces.

Parks and public spaces are not within walking distances of Castlewood and certain facilities such as Southgate shopping centre involve walking/cycling along the Dublin Road where pedestrian and cycling infrastructure is poor.

New developments are car-centric with a lack of sense of place, are car dependent and have no public amenities.

Traffic is a problem in the town centre due to the lack of viable alternative modes of transport and is having an adverse impact on businesses with people favouring retail parks on the edge of town

Investment in alternative modes of transport required and higher density housing required.

The Submitter recommends the following issues addressed:

- Planning standards that discourage car dependent suburbs being constructed.
- Planning standards to ensure that parks, playgrounds and local retail in any new developments are constructed.
- Investment in public transport and cycling infrastructure with dedicated, separated bike lanes.
- More investment in the appearance of the town centre.



Chief Executive Opinion on Issues raised:

The Chief Executive recognises the effect that traffic congestion can have on neighbourhoods and town centres.

A Local Transport Plan is currently being prepared for Drogheda, an objective of which will be to reduce car dependency in the town and promote more sustainable modes of travel including walking and cycling and public transport. The Transport Plan will include a list of projects that will seek to improve pedestrian, cyclist, and public transport infrastructure in the town. The Draft Plan will support the progression and implementation of these projects.

The challenges facing Drogheda Town Centre are recognised. The Draft Plan will continue to focus on delivering compact growth and improving the level of amenities and services in town and village centres throughout the County (including Drogheda) to make them more attractive places to live.

As part of the Government's Town Centre First Strategy a number of initiatives and schemes have been implemented to assist in regenerating the town centre and bringing vacant buildings back into use. This includes the introduction of planning exemptions for the conversion of certain types of vacant commercial property into residential use and a Vacant Property Grant that provides a grant for the refurbishment of vacant properties into residential use. There will be policy support in the Draft Plan for any funding programmes/schemes to assist in the regeneration of town and village centres and reducing vacancy rates.

Support will also be given to the implementation of the public realm works to the Westgate area in Drogheda, which has been granted by An Coimisiún Pleanála, with the overall aim of the project to make the town centre a more attractive destination.

As part of Louth County Council's commitment to modal shift for transport, it will be looking at policies and urban realm improvements that would increase the provision for active travel, including pedestrian infrastructure improvements and cycle lanes.

In terms of new developments – these are already assessed under certain national level guidance on urban design and permeability; however, spot objectives can be made to note the urban design in places, especially in town centres with town centre or regeneration zoning.

Louth County Council, along with the Eastern and Midland Regional Assembly, are also taking a town-centre led approach to help regenerate town centres that have lost character as a result of out-of-town and online retailing, this would include infilling unused sites with housing, as well as increasing the number of active frontages on a street.

Chief Executive Recommendation:

To include policy support in the Draft Plan for the progression of active travel projects and investment in public transport that will assist in reducing dependence on the private car and make walking and cycling a more appealing mode of transport.

To include policy support in the Draft Plan for the delivery of more compact settlement patterns, higher densities in appropriate locations in town centre areas, and the implementation of measures to tackle vacancy and dereliction.

To support the delivery of public realm works and social and community facilities that will assist in creating more attractive public spaces and sustainable communities.



Submission Ref. No: LH-C144-DPIP-150

Submitted By: Ann McVeigh

Summary of Main Issues Raised:

Submission is focused on a number of themes set out below:

Core Strategy

Population growth needs to be regularly reviewed, and sustainable and affordable housing must be a priority.

Compulsory Purchase Orders (CPOs) should be considered as a mechanism for purchasing housing to renovate which is already connected to existing infrastructure.

The introduction of community facilities in the new developments along the Port Access Northern Cross Road (PANCR) should be considered to cater for young families

People and Places

The Living Cities initiative should be encouraged to improve the nighttime economy.

Meanwhile uses should also be encouraged especially in Council owned buildings to stop dereliction and dilapidation.

Support for festivals in Drogheda should continue as they provide benefits to local people and the local economy.

Retailing and Town Centre First

Drogheda town centre is suffering from a limited offering of shops, low footfall and dereliction and a collaborative approach to address these issues is required by stakeholders including the Council, businesses and local community.,

De-cluttering of street furniture is required and shop fronts associated signage needs to reflect the historic character of the buildings.

Part pedestrianisation in the town centre as well as disabled parking is recommended.

Transport, Connectivity and Movement

While the PANCR, once completed, will help alleviate traffic congestion in the town centre, a new station in the North of the town as well as park and ride systems and the extension of the cycle lane network would further reduce traffic congestion.

Green Infrastructure

A central focal point in the form a town square and further greening around St. Peter's Plaza would improve the centre of Drogheda.

Natural and Built Heritage,

Collaboration between the Council and community-led groups is required to balance protecting Drogheda heritage against the need for growth.

Tourism, Culture and Art

Enhancing Drogheda's natural and built heritage through the upkeep of buildings and the utilisation of the River Boyne will encourage more tourism.



Drogheda’s art scene needs to be supported.

Community, Recreation and Social Inclusion

Developing the Lourdes Recreational Centre for community use and Drogheda United Stadium for sport facilities as well as providing more facilities, especially for young people, would be beneficial for keeping the town active.

Chief Executive Opinion on Issues raised:

The Chief Executive notes the need to regenerate town centres across Louth, including Drogheda, which will be led by a town centre-first approach.

The need for services and facilities to be planned and developed in tandem with housing development is a key objective in creating sustainable communities. For the North Drogheda area, the Draft Plan will seek to ensure that developments are also phased in a way that social and community facilities are delivered in tandem with residential development.

Policy already sets out the recommended housing densities and urban design priorities for Drogheda town centre, and any developments will have to demonstrate compliance with same.

A Local Transport Plan is currently being prepared for Drogheda, an objective of which will be to reduce car dependency in the town and promote more sustainable modes of travel including walking and cycling and public transport. The Transport Plan will include a list of projects that will seek to improve pedestrian, cyclist, and public transport infrastructure in the town. The Draft Plan will support the progression and implementation of these projects.

In relation to tourism, the historic built heritage of Drogheda and the Boyne Valley play an important role in County Louth’s tourism strategy.

As part of any developments of community facilities and infrastructure, there is a focus on making them accessibly intergenerationally, meaning that spaces and facilities can be used by young people to supplement other youth services. These policies would be looked to be kept as part of the Louth County Development Plan 2027-2033.

Chief Executive Recommendation:

Review policy objectives and guidance within the County Development Plan to ensure a sense of place is created, as well accessibility to community facilities, active transport networks and tourist sites in the area.

An analysis of existing social and community facilities will be carried out for each settlement, with consideration being given to identifying additional lands for such uses where a need is identified.

Submission Ref. No:

LH-C144-DPIP-152

Submitted By:

Premier Periclase Limited

Summary of Main Issues Raised:

The purpose of this submission is to ensure the new Development Plan provides a clear, supportive, and integrated planning framework for both the Premier Periclase landholding in Newtownstalaban, and the wider Drogheda Port quarter.



The lands owned by Premier Periclase Limited (PPL) at Newtownstalaban are subject to an existing zoning for employment. PPL is in the process of bringing forward a comprehensive regeneration of this existing industrial site, the CORE Sustainable Enterprise Campus. The anticipated potential capital expenditure ranges from €600 million to €1 billion.

The CORE Campus as an Economic Catalyst

The PPL landholding provides a significant opportunity to deliver sustainable employment growth on brownfield lands and will help to address the imbalance between population and employment growth. It is anticipated 50 long term jobs in the first phase and potentially several hundred over future phases will be created as part of the redevelopment. The construction phases will also deliver significant local employment over a sustained period.

The redevelopment of PPL's landholding will deliver a net-zero focused industrial site which can play a strategic role in the promotion of inward investment in Drogheda.

The redevelopment of the PPL landholding will help to deliver significant Foreign Direct Investment, which will act as a catalyst for further investment, including by indigenous companies, in a new sustainably powered campus environment.

Policy Recommendations:

- Include objectives that support economic development at this location, including new energy assets and Large Energy User (LEU) development, as part of an integrated new employment hub.
- Identify the PPL lands as an appropriate location for an 'energy park' type data centre, integrated with other employment and energy uses, as envisaged within the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy.

Energy Infrastructure

The Energy Centre provides a mix of on-site renewable energy generation, battery storage, gas engines and rotary power conditioning, which balances energy imports from the gas grid, imports of energy from the national grid and potentially renewable energy, from nearby suppliers, through power purchase agreements.

The development can help to support the connection of more renewables to the grid and facilitate power export from PPL's campus to the grid in periods of high demand and when there is the risk of a grid fault.

This distributed energy infrastructure allows large energy users to decarbonise their own operations, and actively contribute to, rather than hinder, the ongoing energy transition. The eco-location and coupling of electricity and heat users on a single campus will enable further decarbonisation and storage of energy as heat over an industrial heat network.

This could include reusing 'waste heat from on-site activities, which offers the potential for enabling a municipal district-heating system or assisting and facilitating a future Drogheda Port expansion.

The Draft Plan would benefit from actively facilitating and including specific objectives for integrated energy projects such as the CORE Campus.

Policy Recommendations:

- Prioritise and safeguard utility corridors and lands necessary for the delivery of energy infrastructure, including distribution and transmission infrastructure, in proximity to strategic employment sites like the CORE Campus.
- identify suitable locations for large-scale renewable energy infrastructure while rigorously safeguarding areas of high environmental and visual sensitivity.
- Recognise the strategic importance of the CORE Campus as a site capable of integrating and absorbing energy



generated from emerging Offshore Wind projects in the Irish Sea.

- Identify and designate potential District Heating Zones across Drogheda to facilitate network development, actively seeking to link major heat sources with nearby residential, commercial, and public sector heat sinks.
- Establish a policy framework for the phased development of regional hydrogen infrastructure (production, storage and distribution), acknowledging its role in decarbonising hard-to-abate sectors, including heavy transport and industrial heat.

Transport, Connectivity & Tourism

An integrated approach that prioritises public transport and active travel, alongside improved access arrangements is required to deliver sustainable transport.

The PANCR is important to both the local and regional economy as it would improve connectivity between the Port and the employment zoned lands at and around Premier Periclase with the wider Region whilst also removing related traffic from the town centre.

Policy Recommendations:

- Promote the completion of the PANCR eastwards to connect Drogheda Port to the M1 motorway infrastructure within the lifetime of the plan period, to unlock the residential and employment growth lands to the north and east of Drogheda.
- Incorporate provisions for utilities along the length of the PANCR Road that will allow for future electricity, communications and district heating infrastructure.
- Include measures to maximise the use of the River Boyne amenity along the Baltray Road, including tourism and active travel initiatives.
- Facilitate delivery of a new rail station in North Drogheda, to be integrated with existing and proposed bus, cycle, and pedestrian infrastructure.

Synergies & Integration with Drogheda Port Strategy

PPL supports the strategic objectives of the Drogheda Port Company (DPC) and the need to relocate Drogheda Port Company operations from the Town Quays, consolidating and growing activities at Tom Roe's Point. Both developments will benefit from the same strategic infrastructure improvements with the CORE Campus renewable energy generation and energy storage supporting any future energy strategy of the port.

Policy Recommendations:

- promote and facilitate the relocation of Drogheda Port operations from the Town Quays to Tom Roe's Point, to facilitate town centre regeneration at Drogheda Quays.
- support expansion of DPC port activities at and around Tom Roes Point in tandem with delivery of PANCR, to reduce traffic congestion in the town centre and reduce secondary transport to storage locations.
- pursue recreation and leisure activity potential along the River Boyn.
- support the connectivity and enhancement of the existing power grid at Tom Roes Point.

Chief Executive Opinion on Issues raised:

The Chief Executive acknowledges the submitter's detailed response in relation to the PPL site and surrounds. The submission outlines the potential economic growth of the area and lists the necessary infrastructure upgrades and improvements to facilitate such. The Chief Executive also acknowledges these suggestions and will review their feasibility following consultation with a range of stakeholders and partners.



The Draft Plan will include relevant a narrative and associated policy objectives for Drogheda and the Port area, with the objective of providing sustainable economic growth which is supported by the necessary infrastructure and ensuring protection to the environment.

Chief Executive Recommendation:

To recognise the economic potential of Drogheda, the importance of Drogheda Port in the economic development of the town, and potential of the Premier Periclase site to accommodate economic investment.

Submission Ref. No:

LH-C144-DPIP-159

Submitted By:

Residents of Congress Avenue, Mount St Oliver,
Cherrybrook Drive, Priest Lane and Marian Park in
Drogheda

Summary of Main Issues Raised:

The submission sets out four requests and provides a justification for each as summarised below:

- 1. Rezone the Watery Hill embankment and adjoining slope (at least 15m from the slope edge) to the south of An Cairéal Apartments from A1 Existing Residential to Open Space/Conservation zoning**
 - Ban any building on the unstable slope
 - Clearly designate the Water Hill Steps as a public pathway without privatisation of closing off of the access.
 - Residents have been raising concerns regarding the geological stability of the embankment since 2011 which are extremely hazardous. The embankment slope reaches gradients of 71.6 or greater, exceeding safe thresholds for urban development. Soil nail failures and fractured geology visible.
 - Slope stabilisation works prior to July 2021 were temporary to facilitate An Cairéal development. Subsidence event in July 2021 required emergency intervention. No new geotechnical measures or surveys have taken place (last one in July 2020).
 - Uisce Éireann confirmed that water mains in Congress Avenue and Marian Park had to be routed through attics instead of underground due to unstable geology. Residents reported burst pipes and foundation cracks after the 2021 subsidence and construction of An Cairéal.
 - ACP (ABP-322008-25) refused permission in Aug 2025 citing unacceptable risk to public health and safety. Earlier refusals related to slope instability (PL12-319480, 2010 and PL19.308152, 2022).
 - Retaining wall facing the slope behind An Cairéal Apartments has never been constructed.
 - Contravenes LCDP Policy Objectives ENV 18 (Slope Stability) and INF 40 (Infrastructure in hazard areas); Breaches Section 4(1)(h) of Building Control Act 1990 on structural stability.
 - OPW stressed that zoning decisions must respect hazards and sequential approach in land use planning.
 - Retaining residential zoning exposes the Council, developers and State bodies to liability for injury/damage caused by future slope failures.
 - Insurance companies may refuse cover without updated geological surveys.
 - Proactive rezoning will prevent unsafe development, safeguard public health and reduce risk of costly emergency interventions and incidents.
- 2. Designate Mount St Oliver Street, Priest Lane, Congress Avenue, the Watery Hill Steps and the 1930s retaining wall as an ACA, or as a Local Heritage Area or part of the Millmount Protected View.**
- 3. Add Watery Hill Steps and Retaining Wall to the Record of Protected Structures (RPS)**



The justification in relation to Points 2 & 3 are summarised together as set out below:

- Watery Hill Steps have been in continuous use for centuries and are shown on OS mapping since at least 1830. Provide a vital pedestrian route used daily by children, commuters and elderly residents. Centuries old right of way.
- Retaining Wall (1930s) is a rare example of Free State-era vernacular limestone engineering.
- Congress Ave Housing (1930-50s) – Intact interwar residential scheme within views to Millmount Martello Tower.
- Priest Lane Housing: built before 1916 and used as an architectural pattern for the surrounding streets
- Submissions to Drogheda Joint LAP emphasised the need for safe pedestrian connections, green infrastructure and heritage protection. The rezoning would support these goals and ensure a vital pedestrian access to the town and major transport links is protected, not privatised.
- The Watery Hill Steps, Mount St Oliver and parts of Congress Avenue were included in the designated historic core of the Drogheda in the Urban Designed Framework for The Heritage Quarter, Drogheda published in 2014 and commissioned by Louth Local Authority.
- Watery Hill Steps have lost huge sections of its century's old walls during recent nearby development, and the reconstruction was never completed despite being conditioned. This has resulted in further deterioration of the steps.

4. Implement the already agreed traffic calming measures on the streets adjacent to Watery Hill Steps.

- Residents have reported dangerous traffic conditions (speeding, hazardous on-street parking on blind bends) since at least 2008. Residents have engaged in public consultations in 2022 with one-way traffic plan proposed for the area which was never implemented.
- Minor accidents are a weekly occurrence, and more serious incidents are increasingly frequent.
- Call for the immediate implementation of any previously prepared and discussed traffic calming measures including:
 - Introduction of one-way system on Mount St Oliver and Congress Avenue.
 - Installation of speed cameras at strategic locations.
 - Placement of road mirrors to identify blind spots and improve visibility for all road users.
 - Establishment of marked zebra crossings to improve pedestrian safety.

Chief Executive Opinion on Issues raised:

1. Rezoning of Watery Hill embankment and adjoining slope from A1 Existing Residential to Open Space/Conservation zoning

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined under Point 1 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge a submission in relation to the rezoning element.

2. Designate Mount St Oliver Street, Priest Lane, Congress Avenue, the Watery Hill Steps and the 1930's



retaining wall as an ACA, or as a Local Heritage Area or part of the Millmount Protected View

The Chief Executive recognises the importance of preserving the character of areas through the provision of Architectural Conservation Areas (ACA's). ACAs are essential to safeguarding the identity of Drogheda and maintaining continuity with its development history. The Architectural Conservation Areas of Drogheda will be reviewed as part of the preparation of the Draft Plan and the information contained in this submission will be considered. There will be opportunity for further submissions to be made at the next public consultation stage upon publication of the Draft Plan.

3. Add Watery Hill Steps and Retaining Wall to the Record of Protected Structures (RPS)

As per Part IV, Section 51 of the Planning and Development Act 2000 (as amended) every development plan shall include a Record of Protected Structures. A review of the current Record of Protected Structures shall be conducted as part of the development plan process. If the Watery Hill Steps and Retaining Wall are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest to the County, they may be added to the Record of Protected Structures.

4. Traffic Calming Measures

The concerns set out within the submission in relation to traffic and pedestrian safety are recognised. A Local Transport Plan for Drogheda is currently being prepared which will include a list of active traffic measures identified for delivery in the coming years.

The implementation and delivery of traffic calming measures is outside of the remit of the Development Plan and is instead the responsibility of the Operations Section of the Local Authority. Notwithstanding that, the Draft Plan will include policy support for the implementation of measures included within the Local Transport Plan and any other identified requirements for improved traffic and pedestrian infrastructure in the area.

Chief Executive Recommendation:

To include policy objective(s) and narrative text supporting the informal network of streets, lanes and steps within and adjoining Drogheda's Heritage Quarter.

To review the designation of and associated policies for Protected Views, including Millmount.

To review Architectural Conservation Areas (ACA's) in Drogheda and the Record of Protected Structures (RPS).

To include policies that support improvements to connectivity and permeability and the implementation of active travel measures to provide increased opportunities for more sustainable forms of transport including walking and cycling.

Submission Ref. No:

LH-C144-DPIP-163

Submitted By:

Steven Peck Chartered Town Planner on behalf of
Calmont Ventures Limited

Map showing land subject to Submission:



Figure 1: Aerial image of Collon with lands under the ownership of the submitter outlined in red.

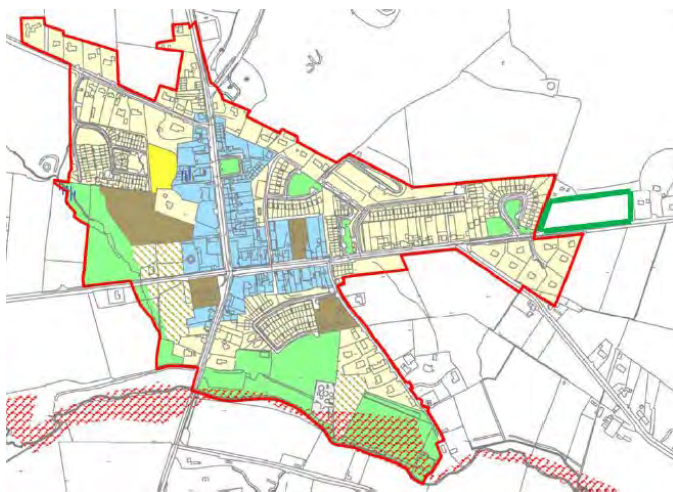


Figure 2: Extract from Collon zoning map as per the LCDP 2021-2027. Settlement boundary of Collon is outlined in red while the lands subject of this submission are outlined in green.



Figure 3: Indicative layout for the development of the lands included as part of the submission.

Summary of Main Issues Raised:

The submission sets out that it relates to high-level planning issues only and is not a request for zoning having regard to the restrictions to do so under Section 11(2)(bc) of the Planning and Development Act 2000 (as amended). The details of the submitter's land ownership as provided with Appendix B (and shown in Fig 1-3) are for information purposes only.

The submission consists of two main parts as set out below.

Part 1: Collon's Population/Housing Growth Allocation should be increased and should be allocated a proportionately larger share of population/housing growth than other Level 4 Settlements

Part 1 relates to the following questions in the Strategic Issues Paper:

- *How and where do we deliver housing to suit the needs of all?*
- *What settlements in the county have capacity for growth and what level of growth do you think is appropriate for these settlements?*
- *How can we reduce car dependency and best promote walking, cycling and public transport?*

The submission argues that Collon is the most suitable Level 4 Settlement for population and housing growth and provides an assessment of each of the Level 4 settlements in Appendix A of the submission.

Collon is the second largest Level 4 Settlement based on population. While population/housing growth allocations for individual Level 4 settlements are not provided in the CDP, it is considered, based on the quantum of A2 New Residential Phase 1 zoned land, that Collon has a far smaller population/housing growth allocation in comparison to the other Level 4 Settlements.

The current CDP sets out that Level 4 Settlements have an important role to play in supporting local growth across the county. However, the current quantum of A2 New Residential Phase 1 zoned land in Collon is constraining the growth of the settlement and the ability to deliver sustainable local growth. It is therefore considered that the population/housing growth for Collon should be increased.

Part 2: Where Considering Lands for Expansion of Category 4 Settlements, consideration should be given as to whether lands are available for development

Part 2 relates to the following question in the Strategic Issues Paper:

- *How and where do we deliver housing to suit the needs of all?*

When considering land for the expansion of Level 4 Settlements, consideration should be given as whether or not the lands are available for development (i.e. confirmed by landowners as being available and free from any



legal or physical impediments to development). This is particularly important in the context of Level 4 settlements given the limited quantum of residential lands available and potential implications in terms of achieving population/housing growth.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of the Small Towns and Villages within the overall settlement hierarchy for the county.

The Chief Executive notes the concerns in the submission in relation to the quantum and availability of A2 New Residential zoned land in Collon. The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025 required that a Settlement Capacity Audit be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan. The availability of lands for development and any constraints of the lands will also be considered as part of the Settlement Capacity Audit.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and may wish to lodge a submission at this stage of the process in relation to the land within their ownership.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the ‘NPF Implementation Housing Growth Requirement Guidelines’ into the Core Strategy of the Draft Plan.

To review the existing capacity and land zoning requirements of settlements in line with the core strategy.



Submission Ref. No:

LH-C144-DPIP-164

Submitted By:

The Institute of Geologists of Ireland

Summary of Main Issues Raised:

The submission notes that the Louth County Development Plan 2027-2033 must comply with Ireland's adoption of the new EU Critical Raw Materials Act 2024 (CRMA) which includes an objective to increase raw material extraction within the EU.

The current Louth County Development Plan (2021 – 2027) recognises that there are a number of naturally occurring resources within the County that contribute to its economic base. Security of supply of critical raw materials has also gained global attention in recent years. The EU has identified thirty-four critical and strategic raw materials vital to the energy, digital, and defence sectors. Given the increasing demand for these materials, mining will remain their primary source of supply for years to come.

While not on the critical list, zinc has a long history of production in Ireland. Each county needs to expand housing building, requiring volumes of raw materials. Consideration of raw material sources and availability, in the County Development Plan, will help prepare Louth for potential supply shocks and price fluctuations.

Aggregates can often be sourced locally. Approval for the development of a mine is subject to acquiring four permissions.

County Councils should understand what mineral resources may be present within their borders. The submission lists data set and information available regarding same. The public often has concerns about mining and are commonly unaware of modern mining and processing methods.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of raw materials to economic growth and development and the requirement for a continual supply of such materials. The advice provided in the submission relating to the datasets available from the Geological Survey of Ireland is welcomed and will be reviewed as part of the preparation of the Draft Plan.

As part of existing Policy Objective ENV47, the Council will continue to work with the Institute of Geologists of Ireland and the Department of Climate, Energy and the Environment as a statutory consultees on any mining or large extraction activities.

The Council will also look to implement objectives to engage with the resources provided by the IGI to identify materials within Louth to avoid potential future land use conflicts.

Chief Executive Recommendation:

To recognise the importance of raw materials in facilitating economic growth and development and that the suitability for any extractive developments will be assessed against a range of environmental criteria.

To engage with the IGI and the Geological Survey of Ireland in identifying Louth's critical raw materials in line with the adoption of the CRMA 2024.



Submission Ref. No:

LH-C144-DPIP-165

Submitted By:

Seosamh Delahunty

Summary of Main Issues Raised:

The submission focuses on a unique and undervalued asset of Drogheda, the network of steps that connect its streets.

Recognition as Important Pedestrian Pathways

Drogheda's distinctive hilly geography, shaped by the River Boyne, has necessitated the creation of numerous pedestrian steps throughout the town. They are overlooked as part of the active travel network providing vital shortcuts and stunning viewpoints of the town. It is essential that the development plan formally recognises these vital shortcuts which provide stunning viewpoints.

Acknowledgement and Protection of Historic Value

Drogheda is steeped in history. The 22 steps are part of its living heritage. It is proposed that the Council conduct a survey of the steps and explore means to protect the most historically significant steps.

A Proposal for Creative Revitalisation: "The Drogheda Steps to History"

A visionary project is proposed to revitalise the network; the project will involve: Thematic Designation, Community and Artist Collaboration and Installation of Recognisable Features. Finance would be from various grants, funds and government programmes.

European Precedents and Tourism Potential

The approach aligns with successful heritage-led tourism initiatives across Europe, e.g. European Heritage Label initiative and the UNESCO World Heritage Journeys project. There is an opportunity to disperse tourist footfall, encourage exploration beyond the main sites and increase dwell time in Drogheda by creating a unique, walkable art trail which would complement existing attractions in the town.

Recommendations for the Development Plan

The submission requests that the following objectives be included in the new Plan:

1. Designate the network of steps in Drogheda as Important Pedestrian Pathways.
2. Commit to a survey and conservation plan for steps of historical significance.
3. Develop and implement the 'Drogheda Steps to History' project in partnership with community groups and artists.
4. Allocate resources for the ongoing maintenance and promotion of this network as a key tourist and active travel asset.

Chief Executive Opinion on Issues raised:

The Chief Executive acknowledges that the informal network of streets, lanes and steps within the medieval town wall reflect Drogheda's historic urban structure, contribute to the ambience and interest of the area and increase permeability within the Heritage Quarter. It is therefore the opinion of the Chief Executive that the Plan should contain policy objectives and associated narrative text which identifies and supports the importance of these features.

Drogheda has an array of heritage assets, and cultural tourism is recognised as one of the most important and



fastest growing aspects of the tourist industry. The Chief Executive will continue to work with stakeholders to support the development of heritage and cultural tourism in Louth. The allocation of resource to support projects does however fall beyond the remit of the County Development Plan.

Chief Executive Recommendation:

To include policy objective(s) and narrative text in supporting the informal network of streets, lanes and steps within Drogheda's Heritage Quarter.

To continue to support the development of heritage tourism in Drogheda and throughout the County.

Submission Ref. No:

LH-C144-DPIP-166

Submitted By:

MKO on behalf of Philomena Kirk

Summary of Main Issues Raised:

Dundalk has been designated as a Regional Growth Centre along the Dublin-Belfast Economic Corridor in the National Planning Framework (NPF). The Revised NPF sets out the need to plan for the delivery of approximately 50,000 additional housing units per annum to 2040. Having reviewed the updated national policies and guidelines the submission raises the following key items for consideration:

Implementation of the NPF Implementation: Housing Growth Requirements Section 28 Guidelines

The housing growth requirements incorporates a calculation for unmet demand and unmet need. The new Annual Housing Growth Requirement to 2034 for Louth County Council has been set at 1,677 units. Guidelines also outline that planning authorities should address the scope for additional provision of up to 50% over and above the housing growth requirement. It is important that the housing allocations for the period of the LCDP 2027-2033 reflect the new annual housing growth requirements set out in the NPF Implementation Guidelines and ensure that sufficient land is zoned to accommodate the growing population and housing needs.

The Requirement for Additional New Residential Phase 1 Zoned Land in Dundalk

Louth County Council is invited to consider increasing the proportion of residential zoned land in County Louth specifically within the Regional Growth Centre of Dundalk enabling the town to grow to city status and supporting the development of increased employment opportunities. The submission advocates compact growth including development of brownfield and infill sites, the development of new urban communities and the sequential approach.

The Two-Year Progress Report for the Louth County Development Plan 2021-2057 noted that Dundalk met 59% of its housing allocation for the period Q4 2021-Q2 2023. It is therefore imperative that Louth County Council zone sufficient 'New Residential Phase 1' in the LCDP 2027-2033 to provide developers with greater options.

Chief Executive Opinion on Issues raised:

The Plan will promote the towns of Dundalk and Drogheda as Regional Growth Centres, designated by both National and Regional policy, alongside promoting their strategic location along the Dublin-Belfast Economic Corridor. The Draft Plan will also continue to encourage compact growth and the development of brownfield and infill sites.

When zoning residential land regard shall be given to any relevant Guidelines published under Section 28 of the Planning and Development Act 2000 (as amended) including the 'NPF Implementation Housing Growth



Requirements' thereby ensuring there is sufficient zoned land in Dundalk to meet the New Annual New Housing Growth Requirements.

Chief Executive Recommendation:

To continue to promote the towns of Dundalk and Drogheda as Regional Growth Centres and support compact growth and the development of infill/brownfield sites in these settlements.

To have regard to any relevant guidelines published under Section 28 of the Planning and Development Act 2000 (as amended) including the 'NPF Implementation Housing Growth Requirements'.

Submission Ref. No:

LH-C144-DPIP-170

Submitted By:

Department for Infrastructure (Northern Ireland)

Summary of Main Issues Raised:

The submission encourages collaboration with Newry, Mourne and Down District Council as they are conducting a similar plan review process simultaneously.

As part of the Northern Ireland Executive's Regional Development Strategy 2035, the Department for Infrastructure looks to integrate sustainable transport and regional connectivity with both Newry, Mourne and Down District Council and Louth County Council as well as bus and rail connections along the Dublin-Belfast Economic Corridor to strengthen regional links.

The Department for Infrastructure wishes to continue working with Louth County Council in relation to the Narrow Water crossing project, as well as various blue and green infrastructure projects including the network of active travel paths, greenways and cycleways connecting Louth to Warrenpoint, Newry, Portadown and beyond.

The submission makes reference to the All-Ireland Pollinator Plan (AIPP), a framework which brings together different sectors across the island to create landscapes for pollinators. The submission suggests that the Council should have regard to the outcomes contained in the AIPP when preparing the Louth County Development Plan 2027-2033. This cross-border collaboration should also extend to flood risk matters and river catchments, as to not let development adversely affect water systems that may cross the border.

Chief Executive Opinion on Issues raised:

As part of Louth's position as a border county, the Chief Executive supports continued collaboration with Newry, Mourne and Down District Council and the implementation of policies that strengthen the ties in cross border matters.

The Draft Plan, as required by both national and regional policy, will continue to provide policies that strengthen transport links – with roads, rail, bus and active travel connections along the Dublin-Belfast Economic Corridor all to be enhanced under the Louth County Development Plan 2027-2033.

The Draft Plan will also seek to implement all-island and cross border strategies into policy including the pollinator policy and water policies affecting cross border catchments.

Chief Executive Recommendation:

To include policy support in the Draft Plan that promotes continued collaboration with Newry, Mourne and Down District Council and departments in Northern Ireland for cross-border regional development and to enhance of the Dublin-Belfast Economic Corridor.

Submission Ref. No:

LH-C144-DPIP-171

(refer to 116)

Submitted By:

Our Lady's College, Greenhills, Drogheda

Map showing land subject to Submission:



Figure 1: Map included as part of the submission identifying approaches to Greenhills School with no path.

Summary of Main Issues Raised:

The submission raises urgent concerns regarding safety of students, staff and residents along the L2307. This road has become extremely hazardous due to heavy truck traffic accessing the quays and port. Traffic volumes have increased significantly over the past five years due to increase in residential housing to the north.

The path outside school is narrow forcing pupils to step onto road and traffic lights are poorly positioned. There is no footpath in various areas; the school side leading to Greenhills Industrial Estate, at the crest of the L2307 on the school side and opposite the Cord Road (refer to map above). There are no safe paths or cycle lanes from any direction. Also, there is insufficient parking for buses and parents causing congestion and blocking of accesses.

Additional concerns include lack of signage indicating presence of school, no speed ramps, numerous housing development without any upgrade to footpaths or roads and insufficient lighting. The Northern Cross Route is to be extended to the port and will include cycle lanes and paths, these could extend to the school and river using European funding. Presently there is little evidence of green and recreational spaces. Furthermore, if access and egress via both the Baltray Road and the L2307 was available this will help split traffic during peak times.

The Council are requested to consider:

- Our Lady's College is willing to consult with the Council and to open to use of grounds to facilitate some development.
- Option to open an entrance on the Baltray Road.
- Option for pedestrian entrance opposite the Newtown link road.



- Adjoining high density estate, only has one access onto the Newtown Road access to this estate could potentially be improved by using some school grounds.
- The school is working with the residents committee for the benefit of the whole community.
- The school has developed facilities and would like to offer safe access to the community both day and night.

Chief Executive Opinion on Issues raised:

The Chief Executive notes the concerns set out within the submission in relation to road safety and traffic congestion along the L2307, particularly in proximity to Shrewsbury Manor and Our Lady's College. While the provision of road signage and traffic calming measures is an operational issue outside of the scope of the Development Plan process, the current Development Plan includes a policy objective in support of investment and improvements to public road infrastructure (MOV 47) and the Draft Plan will continue to provide support for road improvements in the County.

A Local Transport Plan (LTP) is currently being prepared for Drogheda. This Transport Plan will identify potential projects that will promote active travel and improve pedestrian and cycling infrastructure in the town. The Draft Development Plan will support the progression and implementation of such projects included in the Local Transport Plan for Drogheda. In addition, the Draft Plan will include policy support for the implementation of the Safe Routes to School Programme and other sustainable transport initiatives developed by schools.

The comments regarding shared usage of school facilities are welcomed and the new plan will continue to support the sharing and clustering of social and community facilities.

In relation to the request in the submission to consider an additional entrance from Our Lady's School onto the Baltray Road, provision of a pedestrian entrance opposite Newtown link and consideration of a planning application for residential development which is proposing one entrance, these are all matters for the Development Management Section. Nonetheless, the Draft Plan will continue to support improved permeability and connectivity.

Chief Executive Recommendation:

To continue to provide a policy objective to support investment and improvements to the public road infrastructure in the County.

To include policy objectives in the Draft Plan that support improvements to connectivity and permeability and the implementation of active travel measures to provide increased opportunities for more sustainable forms of transport including walking and cycling, especially in the vicinity of schools.

To include policies that support the implementation of Safe Routes to School Infrastructure to make walking and cycling to school a safer option for students and families.

The new plan will continue to support the sharing and clustering of social and community facilities.



Submission Ref. No:

LH-C144-DPIP-172

Submitted By:

McCutcheon Halley Chartered Planning Consultants
on behalf of Glenveagh Homes

Summary of Main Issues Raised:

Purpose of submission

Submission relates to the following headings in the issues paper: Core Strategy, People and Place, Transport, Connectivity and Movement, Water, Climate Action, Natural and Built heritage.

A key issue to be addressed in the forthcoming Development Plan is that sufficient residential zoned land over a 10-year timeframe. Appendix 1 identifies objectives from the current Development Plan which are difficult to implement. Client has a manufacturing facility in Dundalk, producing 'A rated' housing at a scale that is efficient in terms of delivery and affordability. However, these objectives can often undermine this efficiency without adding any significant benefits in terms of design improvements.

Planning Context

Legislative context is outlined.

Project Ireland 2040 – National Planning Framework First Revision – April 2025

National and regional population growth outlined. Revised NPF directs the growth in accordance with the settlement strategy, of which Dundalk and Drogheda are identified as Regional Growth Centres for the County, it requires an uplift of 50% in housing output and methodology should be put in place for core strategies. National Policy Objective 101 is mentioned in terms of serviced and serviceable lands. The new County Development Plan must align with the framework and identify lands most suitable for development. The role of Dundalk as a Regional Growth Centre is highlighted in the NPF and the Draft Revised NPF. Reference is made to Section 3.2 – Chapter 3 Effective Regional Development (Eastern and Midland Region) as well as National Policy Objectives 5, 15, and 57.

Delivering Homes, Building Communities 2025-2030 – An Action Plan on Housing Supply and Targeting Homelessness

The Plan sets out a large-scale approach to deliver at least 300,000 new homes between 2025 and 2030. Pillar 1 of 'Delivering Homes, Building Communities 2025-2030' is in relation to activating supply and it proposes the delivery of key infrastructure to facilitate housing.

Guidelines on National Planning Framework Implementation – Housing Growth Requirements 2025

The Guidelines state that planning authorities should address the scope for additional provision of up to 50% more than the baseline housing growth requirement (Policy Objective 2). Appendix 1 provides New Annual Housing Growth Requirements to 2034 and from 2035 to 2040 (table included within submission). Regarding Louth, the current Plan has a target is to deliver 1,380 units per annum, which is to be increased to 1,677 units per annum. Having regard to 50% headroom, this figure rises to 2,516 units annually, an increase of 1,136 over the current annual housing target. However, the actual delivery of units over the past 4 years has fallen significantly short from the CDP requirements. In Louth there is a deficit of 1,676 units (c.30%) in Louth. The new housing target for the County should also take this deficit into consideration.

Eastern and Midland Regional Assembly Regional Assembly Regional Spatial & Economic Strategy 2019-2031

In the RSES, Dundalk and Drogheda are identified as 'Regional Growth Centres'. The vision for Drogheda and Dundalk is for both to reach a target population in the region of 50,000 by 2031. Additionally, Dundalk is located



within the 'Gateway Region' under the RSES. To fulfil this role, lands must be available for housing.

Sustainable Residential Development and Compact Settlement Guidelines 2024

The Sustainable Residential Development and Compact Settlement Guidelines 2024 set out policy and guidance in relation to residential development and the creation of sustainable and compact settlements. Section 3.3.3 notes that the key priorities for the growth of Regional Growth Centres (a-f). A density of 35 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Regional Growth Centres, and that densities of up to 100 dph (net) shall be open for consideration at 'accessible' suburban/urban extension locations. As per key priority 'F', it is an objective of the Guidelines to promote sequential development with flexibility in certain circumstances.

Census 2022 – Central Statistics Office

Under the 2022 census, the Central Statistics Office (CSO) have introduced 'Built-Up Areas' (BUA's). This creates a land-use-based measure of where urban development occurs and is a way of showing where existing residential development is located.

Development Plans Guidelines for Planning Authorities (2022)

Settlement Capacity Audits (SCA's) were introduced which distinguish between 'Serviced' (Tier 1) and 'Serviceable' (Tier 2) lands. The submission provides details of what a Settlement Capacity Audit (SCA) comprises. Sequential approach is advocated. Where it is necessary to zone serviced or serviceable less central lands these shall be identified and prioritised on a spatially sequential basis. SCAs also require an Infrastructural Assessment.

Future Forty – A Fiscal and Economic Outlook to 2065

Document outlines the requirements for how Ireland will need to build homes to meet future demand. Major scaling-up of construction activity is required. Additional measures required to meet future demand for housing are outlined.

Existing Local Area Plans

The existing County Development Plan has been varied to take account of the Dundalk Local Area Plan. The Dundalk Local Area Plan 2025 was adopted on March 6th, 2025. This was prior to the publication of the Revised NPF in April 2025 formalising the new housing targets, and the county-by-county breakdown of new Housing Growth Requirements in the NPF Implementation Guidelines in July 2025. The quantum of residentially zoned lands is now out of date. County housing targets are outlined.

Proposed Development Plan Provisions

Core Strategy

The purpose of the core strategy and role of Dundalk and Drogheda, are outlined. The Issues Paper states that the new housing targets in the preparation of the new County Development Plan will reflect the allocations in Appendix 1 of the NPF Implementation Guidelines, with 1,677 units annually however the Council should include additional headroom and have regard to any shortfall in housing.

People and Place

The 2021 CDP requires the delivery of 1,380 units per annum in Louth and this figure has been increased under the Revised NPF / Section 28 Guidelines. Details regarding housing completions are provided in Section 2.3 of the submission. Population growth is set to continue having regard to the young demographic profile and net inward migration. Population figures for the Country are provided. The CDP will need to review targets and land zoning in LAPs having regard to the updated population figures, housing targets and the new housing plan. Lands which are zoned to provide for the additional housing input should be Tier 1 lands, ready and serviced for



development. There are objectives in the County development Plan which do not support optimisation of housing return on zoned residential land, the submission refers to Sections 13.8.13 (requiring variety in design) and 13.8.11 (boundary treatments). Appendix 1 of the submission outlines further examples which can be over-prescriptive, contradict national guidelines/standards and militate against the provision of housing at appropriate locations and densities.

Transport Connectivity and Movement

Section 13.16.12 of the current Development Plan sets out car parking standards split into 3 areas whilst Section 13.16.16 relates to cycle parking. The submission advocates flexibility around parking provision. Glenveagh has also encountered difficulties in the implementation of shared or secured bicycle parking requirements. They fully support EV transport and the provision of EV charging facilities. However, the provision of these facilities in shared or on street parking is complicated and can lead to difficult servicing provisions. In relation to EV facilities and car/bike parking, the forthcoming development plan needs to avoid standards that are too onerous/prescriptive that could undermine or detract from the amenity of residential schemes. Flexibility would also allow for technological advances. The submission advocates the 20% of EV chargers are grouped together at charging hubs.

Water

With regard to the settlement hierarchy there should be consistency in relation to infrastructure provision across settlements (particularly in relation to water supply and wastewater treatment). Uisce Eireann's Dundalk wastewater treatment plant (WWTP) is operating within capacity, with headroom of c. 12,800 pe. It is also reported that other projects are currently at design phase aimed at increasing capacity of the wastewater infrastructure in Dundalk including a new rising main between the Coes Road pumping station and Dundalk WWTP and a potential connection of an element of the Blackrock wastewater network to the Dundalk network. The recent revenue allocation under the National Development Plan and Budget 2026 to Uisce Eireann will assist in these moving forward.

Section 13.20.4 of the County Development Plan requires that all new developments (including amendments/extensions to existing developments) incorporate 'Sustainable Urban Drainage Systems'. However, there may be sites where the implementation of SUDS is not feasible, the development plan should be flexible. An objective should be included to state that the provision of SUDS features will be generally supported and that sites where SUDS is not feasible alternative stormwater infrastructure can be provided.

Climate Action

Glenveagh Homes aim to achieve net zero emissions by 2050. They have a production and manufacturing process that allows them to produce high quality 'A rated' housing. However, it can be undermined by the introduction of objectives, which require significant variations in house types, materials/elevation treatments etc... the submission draws attention of Section 13.8.13 and Policy Objective HOU 30.

Natural and Built Heritage

Section 13.8.12 of the existing Development Plan includes a provision in relation to the replanting of native trees.

'Where existing trees are required to be removed to facilitate a development, replacement native trees at a ratio of 5:1 shall be planted in Drogheda and Dundalk, with a requirement of 10:1 in the County Area. A ratio of 5:1 should be applied across all areas of Louth.

Conclusion provided and Appendix 1 outlining observations in relation to the following Sections of the current County Development Plan 13.8.11, 13.8.12, 13.8.13, HOU 30, 13.8.18, 13.8.20, 13.16.12 + 13.16.16 and 13.20.4.



Chief Executive Opinion on Issues raised:

Reference to the various Plans, Strategies and Guidelines are noted.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a ‘Settlement Capacity Audit’ to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. The Settlement Capacity Audit was on going at the time of writing.

The Planning and Development Act 2024 was signed into law in October 2024. Chapter 5 of Part 3 of this Act details the statutory process of the preparation and making of a Development Plan and the information required to be included in same.

It is acknowledged that under the provisions in Part 3 of the 2024 Planning and Development Act the lifetime of Development Plans will be 10 years however this Development Plan is being prepared under the 2000 Act (as amended) and therefore will have a life of 6 years. Headroom of up to 50% will be factored into the calculation for the quantum of residential lands required to meet the housing growth requirements for the County during the lifetime of the Plan. This quantum of headroom is allowed for in the NPF Implementation Housing Growth Requirements Guidelines published in July 2025.

When zoning residential land regard shall be had to ‘Development Plans - Guidelines for Planning Authorities’ (July 2022) or any updated guidelines. And any other relevant Guidelines published under Section 28 of the Planning and Development Act 2000 (as amended) including the ‘NPF Implementation Housing Growth Requirements’ thereby ensuring there is sufficient zoned land in Dundalk to meet the New Annual Housing Growth Requirements.

The Draft Plan will continue to promote the towns of Dundalk and Drogheda as Regional Growth Centres, as designated by both National and Regional policy, alongside promoting their strategic location along the Dublin-Belfast Economic Corridor.

The submission requests that various Sections within are reviewed:

Section 13.8.11 relates to boundary treatments in residential developments and Section 13.8.12 pertains to the ratio of replacement trees, Section 13.8.18 is regarding the configuration of EV charging facilities, and Section 13.20.4 relates to the requirement for SUDs, these standards will be reviewed as part of the development plan process.

Section 13.8.12 and Policy Objective HOU 30 pertains to streetscape variety. The Chief Executive is of the opinion that the overall layout and design of buildings and materials utilised can significantly contribute to a sense of place therefore this Section and associated Policy Objective will be carried through to the new Plan. Section 13.8.20 encourages the provision of a piece of art, given that the provision of artwork is encouraged rather than required it is also considered appropriate if this section is provided for in the new County Plan.

Sections 13.16.12 and 13.16.12 relate to Parking Standards. Variation 2 of the Louth County Development Plan 2021-2027 considered the ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ and car parking standards in relation to residential developments were amended accordingly, these shall therefore be carried forward to the new Plan. The configuration and location of cycle storage in individual residential schemes is dealt with through the development management process.

Chief Executive Recommendation:

To continue to promote the towns of Dundalk and Drogheda as Regional Growth Centres and provide a policy

framework for the settlements to ensure they will be able to realise their economic and employment potential and develop into centres of scale that can facilitate population and economic growth.

To ensure there are sufficient lands available throughout the County and in particular the settlements designated for growth to meet the projected housing requirements identified for Louth in the Housing Growth Requirement Guidelines, which will be transposed into the Core Strategy of the County Development Plan.

Chapter 13, including Sections 13.8.11, 13.8.12, 13.8.18, and 13.20.4 of the 2021-2027 County Development Plan will be reviewed as part of the preparation of the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-173

Submitted By:

John Spain Associates on behalf of GEM Construction

Map showing land subject to Submission:

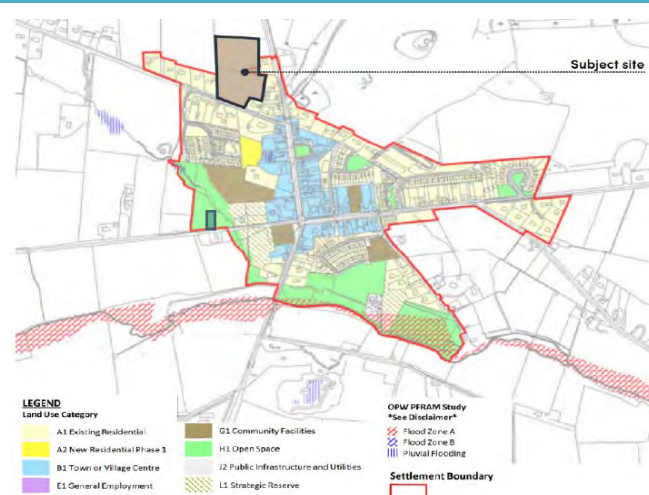


Figure 1: Map included as part of the submission illustrating the location of the lands in question.



Figure 2: Extract from Collon zoning map under the LCDP 2021-2027 to illustrate the location of the lands in the context of the settlement of Collon (lands outlined in black for ease of reference - not to scale).



Figure 3: Indicative Site Layout included as part of the submission.

Summary of Main Issues Raised:

Introduction

An introduction is provided which includes details regarding the NPF Implementation: Housing Growth Requirements Guidelines (July 2025) and background to the submitter. It is stated that the submission will emphasise the role of Collon to support additional growth in a way that strengthens its role as a designated Small Town/Village settlement within the county hierarchy.

Strategic Issues Consultation Booklet

Format of Strategic Issues Consultation Booklet is outlined.

Submission sets out a planning rationale for designating additional growth to Small Towns and Villages and details are provided on how Collon Village could grow spatially and in a sustainable manner.

Pre-Draft Strategic Issues Paper Consultation booklet grounds of Submission.

Core Strategy and Settlement & Housing

Summary of issues paper in relation to Core Strategy and Settlement & Housing is provided. The Planning Authority are requested to consider the following:

- Issues Paper acknowledges that the quantum of housing that is required for the county over the plan period is determined by the National Planning Framework's Housing Growth Targets.
- Requirements of NPO 42 & NPO 7 set out in submission.
- NPF Implementation: Housing Growth Requirements require c. 55,000 new homes per annum c. 2025 and 2034
- Louth's Annual housing target is revised from 956 to 1,677 units.
- When the relevant development plan provisions of the Planning and Development Act 2024 are commenced, the Plan period will be extended from 6 to 10 no. years regardless planning authorities should consider as an immediate priority the suitability of lands for development over a 12 year plus period.
- Based on Appendix 1 of the NPF there is a requirement to zone enough land across the County to cater for a minimum of c.20,355 no. homes over the next 13-year period. Headroom of 50% should be added to the figure above recognising that a relatively significant proportion of zoned lands are not activated over the period of a development plan.



- When providing for future population growth and housing the planning authority needs to consider why current residential lands have not been brought forward (4no. reasons provided).
- The submission highlights Collon's potential and why it is ideally positioned for additional growth.

Transport & Movement

Summary of issues paper in relation to Transport and Movement is provided. The Planning Authority are requested to consider the following:

- The Revised NPF highlights that we need to change the way we travel, increasing sustainable modes.
- NPF's strategy is to make better use of under-utilised land and buildings, better serviced by existing facilities and public transport.
- Delivering Homes, Building Communities 2025-2030 highlights the need for alignment between transport, infrastructure and housing.
- Settlement and housing policy is to support the role of Collon by facilitating development that will contribute to the character and structure of the village.
- Existing public transport provision in Collon is outlined.
- Public transport provision in Collon supports additional housing growth.
- Notwithstanding the Regional Growth Centres the new Development Plan must recognise the potential for Collon.

Summary

Collon is one of eight designated Small Towns and Villages, population growth should be considered on a pro rata basis. Collon provides an opportunity to contribute to the anticipated housing need, given its established community, good public realm, public transport, and established road connections. Collon could be sequentially expanded. Suitability of the northern part of Collon is illustrated in Appendix 1:

- Lands to the north satisfy national and regional policy criteria.
- They are contiguous with existing development.
- Greenfield with no significant constraints.
- Development would capitalise on, ongoing investment in social and community infrastructure.
- Lands provide excellent connectivity to employment opportunities.
- Given the availability of the lands and location adjacent to the built-up footprint the northern area should be considered to accommodate additional residential growth.

Appendix 1 Development Vision for Lands at Oriel Road, Collon, Co Louth

Purpose of Report outlined.

Relevant Planning History and Background: Lands previously zoned residential in the LCDP 2009-2025, permission granted for 23units on southern part of the site, development plans to be revised and varied, lands are sequential to zoned lands, strategically located within Collon. Core Strategy for Collon outlined.

Site Location and Context

Maps provided showing site in relation to the town centre (within 1km radius) and site photographs provided.

Strategic Regional Context

Located at crossroads near centre of Collon Village. The N2 and Ardee Road provide access to the national roads network, surrounding towns and centres of employment. Maps provided showing site in relation to the LCDP 2015-2021 and 2021-2027.

Planning Framework and History

Lands presently zoned A2 New Residential Phase 1 in the LCDP 2021-2027 have not been brought forward. The



subject lands were de-zoned when the LCDP 2009-2015 was approved, after permission for 23 units on the southern half of subject landholding was approved on the 18th of April 2009. Extension of Duration was subsequently refused.

Density Principles and Background

Chapter 3 of the 'Sustainable Residential Development and Compact Settlement Guidelines' provide guidance for the integration of residential density standards into statutory plans, planning authorities are provided with flexibility.

Application of the Guidelines in Relation to Density

Policy Objective 3 of the Sustainable Residential Development and Compact Settlement Guidelines' outlines a stepped approach to density analysis.

Methodology

The submission outlines the methodology in the 'Sustainable Residential Development and Compact Settlement Guidelines' for applying the recommended residential densities in Section 3.3. An appropriate density for site is set accordingly.

Summary of the Proposed density.

Design response results in a density of 25-27 dwellings/ha.

Urban Design Rationale

Key Urban Design Considerations.

Layout designed around an inner landscaped open space with a 'Village Green'. Provision of home zones and houses of various design. Potential layout for the site is also provided as shown in Figure 3 above.

Deliverability

Residential track record of Gem Construction

GEM construction track record outlined, examples provided of various developments.

Conclusion

Proposed development site on Oriel Road provides logical and sustainable opportunity to accommodate much needed residential growth in Collon. It is immediately serviceable and unconstrained by environment and heritage sensitivities. It would respond directly to increase housing demand in Louth. The project would benefit from the involvement of GEM as an experienced and proven housing delivery partner.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of the Small Towns and Villages within the overall settlement hierarchy for the county.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

It is acknowledged that under the provisions in Part 3 of the 2024 Planning and Development Act the lifetime of Development Plans will be 10 years however this Development Plan is being prepared under the 2000 Act (as amended) and therefore will have a life of 6 years. Headroom of up to 50% will be factored into the calculation



for the quantum of residential lands required to meet the housing growth requirements for the County during the lifetime of the Plan. This quantum of headroom is allowed for in the NPF Implementation Housing Growth Requirements Guidelines published in July 2025.

The Planning and Development Act 2024 was signed into law in October 2024. Chapter 5 of Part 3 of this Act details the statutory process of the preparation and making of a Development Plan and the information required to be included in same. Under this legislation the duration of a Development Plan would be 10 years.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

The subject lands are currently outside of and immediately adjacent to the settlement boundary of Collon as shown in Figure 2 above.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from considering the rezoning of the lands outlined in black in Figure 2 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the ‘NPF Implementation Housing Growth Requirement Guidelines’ into the Core Strategy of the Draft Plan.

To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

Submission Ref. No:

LH-C144-DPIP-174

Submitted By:

Brady Hughes Consulting on behalf of Andrew Purcell and Des Campbell

Summary of Main Issues Raised:

The submission sets out the following points for consideration when preparing the new Development Plan:



Background and NPF Context

The National Planning Framework (NPF) Implementation: Housing Growth Requirements (July 2025) now requires Louth County Council to plan for 1,677 new homes per annum to 2034, significantly above the previous target. With the required headroom of 50%, the provision of lands shall accommodate 2,516 units per annum to 2034.

Policy and Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Current Position for Termonfeckin – Baseline Assessment

Termonfeckin is a tier 3 settlement, identified as a Self-Sustaining Town (along with 4 others). The growth strategy for these Self-Sustaining Towns focuses on driving investment in services, employment growth and infrastructure while balancing housing delivery, including consolidation of the core areas and delivery of compact growth.

Policy Objectives SS52-54 of the current LCDP 2021-27 are relevant in respect of Termonfeckin, and aim to support economic growth, balanced and proportionate population growth, and providing opportunities for serviced sites to meet rural housing requirements. With a large rural hinterland under strong pressure for one off houses, Termonfeckin is an ideal location to provide for low density serviced site schemes that could provide a viable alternative to rural one-off dispersed dwellings.

Termonfeckin has grown between 2016 and 2022 much faster than the CDP targets, having already exceeded the population projections two years in advance of the plan period. The Core Strategy was based on inaccurate assumptions regarding the estimated population growth that took place between 2016 and the plan that was made in 2021.

Five sites currently zoned A2 New Residential Phase 1 within Termonfeckin. Of these five sites, three sites have no planning applications made during the life of the CDP and no progress on site. One site has a current application for 41 units (decision due December). The last site has planning Permission for 11 houses and the refurbishment of an existing derelict cottage- This site was formerly in the ownership of the submitter, with construction expected to begin in the new year.

During the plan period, only two sites have permission, and it is reasonable to conclude that the other three are unlikely to. In this regard, opportunities for additional development on lands that are contiguous to and sequential to the built-up area of the town and on lands with access to roads and services should be considered by the Planning Authority.

Required Response / Submission

The submission suggests that Termonfeckin's housing target (70 households from 2021-2027 i.e. 12 per year) should be increased.

The current core strategy allots just 1.1% of the entire household allocation to Termonfeckin (70 out of 6,524 units). If this allocation is applied proportionately to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom, Termonfeckin should be targeting delivery of 28 units per annum for the next 10 years. This generates a requirement over the next decade for over 28ha of land zoned for Residential development (assuming a delivery density of 25 dwellings per ha).

The zoning of more land would be consistent with the Minister's direction to the Chief Executive, the town's designation as a Self-Sustaining Town and strategic location near the M1 motorway, and the need to support revitalisation and regeneration of small towns by achieving critical mass in population.



The new Plan should consider the following:

6. Provide Termonfeckin with a higher proportion of the county's core strategy housing allocation.
7. Extend the settlement boundary of Termonfeckin to allow for additional new housing and strategic reserves to take account of the full NPF Implementation housing requirements to 2040.
8. Include for provision of play facilities, increased green spaces and a green pedestrian and cycle link between the village centre and the Seapoint Road.
9. When choosing lands for future development, priority should be given to lands that-
 - Present an opportunity for immediate delivery in line with the Minister's direction.
 - Are contiguous to and sequential with the current settlement boundary.
 - Have access to Uisce Eireann infrastructure adjoining and already on the site.

We would encourage a proactive approach with respect to identification of suitable lands and with a view to aligning local delivery mechanisms with national objectives thus ensuring a sustainable, serviced, and plan-led housing strategy for Termonfeckin.

Chief Executive Opinion on Issues raised:

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

The Draft Plan will incorporate a Social Infrastructure Audit which will assess existing community assets and inform the policy provisions and narrative for the settlement.

Chief Executive Recommendation:

Incorporate the housing allocation for Louth as provided for in the 'NPF Implementation: Housing Growth Requirement Guidelines' into the Core Strategy of the Draft Plan.

Carry out an analysis of land use zonings in each settlement to identify the capacity of zoned lands for residential development to meet the allocation provided for in each settlement in the Core Strategy of the Draft Plan.



Submission Ref. No:

LH-C144-DPIP-175

Submitted By:

Inland Fisheries Ireland

Summary of Main Issues Raised:

Background to function of Inland Fisheries and definition of 'Fisheries' provided. Importance of many of Louth's lakes and rivers in terms of habitats and the protective role of the Inland Fisheries Ireland outlined.

It is stated that the Development Plan provides the opportunity to protect the quality of the aquatic environment through policies addressing water quality, the physical environment, hydrological processes and biodiversity and, that the maintenance of habitat is particularly important.

The EU Water Framework Directive (2000/60/EC) is referred to and its primary objective which is to prevent further deterioration and to protect and enhance the status of aquatic ecosystems. This requires that river systems be protected on a catchment basis.

The Development Plan should refer to angling as a recreational sport and recognise its contribution to tourism and the provision of facilities which encourage angling.

Water Quality and Wastewater Treatment Infrastructure

Sufficient capacity must be available both within the wastewater network systems and downstream of wastewater treatment plants to ensure the ecological integrity of the ultimate receiving waters are protected

Aquatic Habitat Protection (including protection of Riparian Habitat):

A policy in relation to aquatic habitat protection should be included in the Development Plan. Protection has been on an ad hoc basis. Development can require modification and major disturbance to habitats and loss of riparian habitats along the river corridor. The Council under the terms of the EU Water Framework Directive (WFD) (2000/60/EC) is legally obliged to protect the ecological status of river catchments and channels. Riparian buffers should be sufficiently wide to protect the watercourses. Local authorities should address the need for riparian habitat protection. It is requested that the IFI are consulted on any development which could potentially impact upon aquatic ecosystems and riparian habitat.

River Crossing Structures:

Poorly designed river crossings can lead to loss of habitat and could have implications for fish species and could contravene the Water Framework Directive. Structures should be designed to have least impact on fish passage. IFI recommends that the Plan should include a clear policy on the use of clear span structures on fisheries waters and that they are consulted accordingly.

Stream Fragmentation

The Plan should include a clear policy on the prevention of river fragmentation and that they should be consulted on any such proposed developments.

Sustainable Urban Drainage:

Storm water management should be designed in accordance 'Nature-based solutions for the management of rainwater and surface water run-off in urban areas'

Invasive Species & Biosecurity

The Development Plan should include policies to ensure that developments do not lead to the spread of invasive species.



Water Conservation

The Development Plan is an opportunity to promote policies and awareness of water conservation this will ensure reliable water supplies in the future. Best practice should be promoted in respect of water conservation in all developments. Accomplishing water conservation and water use efficiency goals will require action by all water users.

Management Policies

The following mechanism should be considered for the management of the aquatic environment:

- River Corridor Management Areas
- Special Preservation Orders provided for specific habitats in need of protection e.g. an Aquatic Protection Order.
- Special Amenity Areas, identified for their potential as Linear Parklands along waterways.

In the context of the Plan, a watercourse could be assessed in relation to its existing aesthetic, amenity and recreational value. Watercourses are assets and can provide an attractive feature. Submission requests that the Development Plan provides for the maintenance and preservation of all waterways and riparian habitats.

A Sustainable Development Plan and the Environment

In determining the likely significant effects of plans or programmes, consideration should be given to potential significant impacts on: Water quality, Aquatic and associated riparian habitats, biological diversity, ecosystem structure and functioning. fish spawning and nursery areas, surface water hydrology, passage of migratory fish areas of natural heritage importance including geological heritage sites, sport and commercial fishing and angling as well as amenity and recreational areas

The Development Plan should:

- Be consistent with River Basin Management Plan(s) and comply with the requirements of the EU Water Framework Directive (WFD) (2000/60/EC).
- Include policies which preclude developments in areas where the wastewater infrastructure facilities necessary for development do not exist.
- Advocate a change from an acceptance of river corridor interference to an assumption against it.
- Promote the integration and improvement of natural watercourses in urban renewal and development proposals.
- Encourage Local participation in urban and rural renewal.
- Include provision for consultation with IFI on developments which may impact on the aquatic environment

Chief Executive Opinion on Issues raised:

The comments put forward by Inland Fisheries Ireland (IFI) are welcomed and the importance of this statutory body in its role in the protection of our rivers and aquatic environment and habitat is recognised. The need to maintain water quality is key to conservation of biodiversity and water dependant habitats and species is also acknowledged.

The new County Development Plan will continue to support initiatives which encourage the development of tourism throughout the County including those relating to angling.

Water Quality and Wastewater Treatment Infrastructure



The Council will liaise with Uisce Éireann in relation to the capacity of the water services infrastructure throughout the County, regard shall be had to the capacity of the County's Water Treatment Infrastructure when identifying additional lands for development.

Aquatic Habitat Protection (including protection of Riparian Habitat)

The role of the development plan in protecting the ecological status of river catchments and channels is acknowledged. The current County Development Plan promotes the importance of riparian strips in maintaining the ecological and environmental quality of watercourses. It is intended that the policy objectives and narrative text will be maintained and enhanced in the new plan as appropriate/relevant.

River Crossing Structures

It is acknowledged that river crossing structures have the potential for negative impact upon watercourses however such projects are subject to environmental considerations such as EIA and AA.

Stream Fragmentation

The new Plan will provide narrative text and associated policy objectives that seeks to avoid river fragmentation and to encourage the connectivity or the re-connectivity where possible.

Sustainable Urban Drainage

Sustainable urban drainage systems are designed to prevent pollution of streams and rivers and minimise the impacts of urban runoff. The new County Development Plan will continue to require that all new developments (including amendments/extensions to existing developments) incorporate 'Sustainable Urban Drainage Systems' as part of the development/design proposals.

Invasive Species & Biosecurity

The new County Plan will contain policy objective(s) and associated narrative text to prevent and control the spread of invasive species.

Water Conservation

Fresh water resources are increasingly becoming an issue of environmental and economic importance. The new County Development Plan will continue to encourage reduction in water consumption and will encourage the use of rainwater recovery systems.

A Sustainable Development Plan and the Environment

In all instances the new development plan will be consistent with River Basin Management Plan(s) and comply with the requirements of the EU Water Framework Directive (WFD) (2000/60/EC). The plan will be subject to Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment. Inland Fisheries will be consulted on any proposal which is likely to impact negatively on an aquatic environment.

A green infrastructures strategy will be prepared as part of the Draft Plan process it will draw attention to the importance of designated and non-designated sites, streams, river corridors, and green spaces to be protected and enhance opportunities for recreation and tourism and in adapting to climate change.

Chief Executive Recommendation:

Support initiatives which encourage the development of tourism throughout the County including those relating to angling.

Ensure that zoning of land aligns with the capacity of water and wastewater services.

To promote the importance of riparian strips in maintaining the ecological and environmental quality of



watercourses.

Provide narrative text and associated policy objectives that seeks to avoid river fragmentation and to encourage the connectivity or the re-connectivity where possible.

To continue to require that all new developments incorporate 'Sustainable Urban Drainage Systems'.

The new Plan will provide a policy objective and associated narrative text that seeks to prevent and control the spread of invasive species.

The new County Development Plan will continue encourage reduction in water consumption and will encourage the use of rainwater recovery systems.

The new development plan will be consistent River Basin Management Plan(s) and comply with the requirements of the EU Water Framework Directive (WFD) (2000/60/EC). And will be subject to Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment.

The new plan will be informed by a Green Infrastructure Strategy.

Submission Ref. No:

LH-C144-DPIP-176

Submitted By:

Kevin Enright

Summary of Main Issues Raised:

The submission sets out that proposals and plans for new railway infrastructure in Co. Louth have been in place for over 20 years but have not progressed (railway station in north Drogheda, reopening of Dunleer and Castlebellingham stations and a station at Dundalk south).

The submission outlines that parking capacity at the existing stations in Louth (Drogheda and Dundalk) are at capacity by 7.30am on weekdays and it appears that no provision is made for the anticipated increase in passenger numbers arising from the increased Enterprise service and Dart+ Coastal North. This is unsustainable from a social, economic and environmental position.

Outlines that the new Plan should include specific proposals for developing rail infrastructure in co-operation with other State bodies. Opportunity for the Council to take leadership by zoning land required for facilitate the delivery of the necessary infrastructure.

The submission sets out possible locations for a rail station in north Drogheda and Dundalk south and also sets out the constraints relating to the reopening of Dunleer station and the potential opportunities in Castlebellingham. All new stations must provide large car parks with sufficient space for expansion.

The submission notes that some Transport Planners have objected to new stations between Dundalk and Drogheda on the basis that there would demand for Enterprise services to stop at these stations. There is no basis for such an objection, and a solution could be to have intermediate stations for commuter trains only.

While it is unrealistic to expect new railway infrastructure to be delivered by 2033 however specific plans should be put in place to facilitate delivery in a realistic timeframe.

The submission also cites concerns regarding increased traffic volumes accessing the M1 Retail Park with congestion occurring on roads leading to the Hill of Rath and M1 Retail Park roundabouts. The submission sets out that a solution to this could be the provision of an additional road access to the M1 Retail Park and traffic lights at the Hill of Rath roundabout.



Chief Executive Opinion on Issues raised:

While the final decision new rail services is made at a national level by agencies including the National Transport Authority (NTA), Iarnród Éireann, and the Department of Transport, the importance of continued investment and upgrades to rail services in the further growth and development of Louth is recognised.

The provision of an additional road access to the M1 Retail Park and traffic lights at the Hill of Rath roundabout would be an operational issue. The current Development Plan includes a policy objective in support of investment and improvements to public road infrastructure (MOV 47) and the Draft Plan will continue to provide support for road improvements in the County to improve traffic flows and permeability and connectivity.

Chief Executive Recommendation:

To continue to provide a policy objective to support investment and improvements to the public road infrastructure in the County.

To include policy objectives in the Draft Plan that support improvements to connectivity and permeability and the implementation of active travel measures to provide increased opportunities for more sustainable forms of transport including public transport, walking and cycling.

To continue to promote a modal shift through supporting policy objectives and provide policy support for the implementation of the Local Transport Plan.

To promote and encourage rail usage and investment in rail infrastructure through supporting policy objectives and narrative in the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-177

Submitted By:

Dom Gradwell on behalf of Drogheda Vacancy & Dereliction Group

Summary of Main Issues Raised:

The submission sets out the issues that are currently being faced by Drogheda, namely lack of employment opportunities; lack of higher education institute appropriate to the population equivalent; lack of appropriate tourist accommodation; the amount of dereliction and vacancy within the town centre and its effect on the main thoroughfare; lack of sufficient sporting facilities and green spaces and the neglect of Drogheda's unique heritage buildings.

The submission asks the Council to promote Drogheda as a great place to live and to ensure that the catchment can deliver fully on its potential, not just become a highly populated commuter city.

Key questions/challenge for the Council: how to manage the town largest towns in the country (Dundalk and Drogheda) in an even-handed manner and how to manage the dramatic population growth in the Drogheda catchment area with the provision of sufficient levels of services and facilities to function effectively.

The submission sets out that there are a number of measures that the Council can implement/encourage that would help to address the current issues in Drogheda:

Living Cities initiative



The inclusion of Drogheda and Dundalk in the Living Cities Initiative is welcome. Important that the Council dedicate resources to encourage participation and work closely with stakeholders.

Use of Vacant Property for Community Use

Encourage the Council to engage with organisations and groups in the area to maximise the use of vacant Council owned property through initiative such as Community Recognition Fund.

Encourage Diversity in the Town Centre

Control the proliferation of certain types of uses in the town centre such as casinos, bookmakers, vape stores, nail bars, barber shops and phone shops. While there is an issue of vacancy in Drogheda, it is still important that the Council encourages a diversity of retail, culture and leisure uses in the main thoroughfare.

Implement Rules on Shopfronts

Decline in the standard of shopfronts in Drogheda in recent years. Implore the Council to enforce the rules set out in the Council guidance document 'Shopfront Design Guidelines'.

Continue the current momentum on Dereliction and Vacancy

Applaud efforts being made by the Council to deal with derelict and encourage the current momentum to be further enhance. Suggest using levies to provide greater resources to the team to achieve this.

Development a town centre performance space

The town lacks a dedicated venue for mid-range performances, and such a venue would breathe life into the nighttime economy in Drogheda. Suggest the reuse of the current library on Stockwell Street as a theatre style venue after the completion of the move of the library.

Pedestrianisation

In line with the above proposal for the redevelopment of the library on Stockwell Street, the submission proposes part pedestrianisation of the area from the junction at West Street to the entrance to the car park and two-thirds of the way down towards Leland Place.

They believe that the original cobbled street still exists under the tarmac, which could be removed to give the area a more historic feel. Businesses could be incentivised to set up in the area to turn it into an entertainment zoned e.g. like Monck Street, Wexford.

Entry Signage

Consider erecting welcoming signs on all approach roads into Drogheda to sell the area as a destination

M1 Signage

Meath & Louth County Councils should actively pursue improved signage along the M1 to promote the tourist attractions we have in the area e.g. Brú na Bóinne UNESCO World Heritage Site, Oldbridge House etc.

Develop a riverside public space

The Council should acquire Abbey Centre and develop a plaza area.

Laurence's Gate

The Council should apply pressure on the OPW to progress the long-promised works at Laurence's Gate.

Request that the Council remove all street furniture at the top of Laurence's Street and raise the paved thoroughfare to be level with the footpath to create a plaza area that could be used for public events.

Progress floating pontoon



Serious consideration should be given to the provision floating pontoon on the River Boyne as a tourism feature/attraction.

Develop a bike hire scheme for Drogheda – given the population of the area, it merits serious consideration.

Allocate lands and resources to encourage camper van tourism

Consideration should be given to the provision of an official campervan park facility in Drogheda given its tourism potential.

Invest in The Dale/The Mollies

This is an overlooked part of Drogheda and offers an opportunity for sensitive development to improve its potential as a quiet, retreat-style natural trail while celebrating historical connection to the visit of Oliver Cromwell in 1649.

Develop a town wall trail

Ask the Council to investigate partnering with the OPW and heritage stonework experts to prevent further decay of the town wall structures, to bring them up to safe standards and allow the town to be celebrated e.g. like the Freedom Trail in Boston, USA. The visible parts of the town wall at West Gate, Buttergate, St. Mary's Church of Ireland and Featherbed Lane should be earmarked immediately to salvage and improve their condition.

Reinstate Bandstand in Dominic's Park

Request that the Council reinstate a public performance space in the park to allow for outdoor events.

Illuminate Heritage Buildings

Undertake a programme to identify and illuminate history and iconic buildings in Drogheda to celebrate them all year round, not only during the Lú Festival.

Sports, Recreation and Green Spaces

Request that the importance of sports and recreation and green spaces is considered when land use zoning decisions are being made.

Chief Executive Opinion on Issues raised:

Living Cities Initiative

As part of the Budget for 2026 The Living City Initiative has been expanded to include Drogheda and Dundalk, offering significant tax incentives for refurbishing older buildings, converting "over the shop" spaces into homes, and revitalizing town centres by extending eligibility to properties built before 1975. This move aims to bring new life to these urban areas, support local enterprise, protect heritage, and boost housing, marking a major opportunity for regeneration and closer city status for Drogheda. The Draft Plan will support the implementation of the Living City Initiative in Dundalk and Drogheda.

Town Centre Regeneration/ Public Realm

Louth County Council have a dedicated team looking after town centre regeneration. This team will look at regeneration projects to stimulate enhancements within the town centre. The importance of a clean urban environment and the appearance and presentation of buildings, streets and signage is recognised and plays a vital role in attracting people to live, work and do business in the urban area of Drogheda.

Any plans to pedestrianise or part pedestrianise the town centre or to provide a town square as a recreational area/for events would be subject to specific public consultation process and there would be an opportunity to make a submission at that juncture.



In accordance with national, regional and local planning policy, the Council will continue to promote the development of vacant and under-utilised buildings and land. Incentivising and encouraging a vibrant and sustainable town centre for Drogheda is a key theme of the Plan and will be a key objective of the Council.

Louth County Council have already brought forward specific town centre projects tasked with regeneration and reducing the amount of vacancy and dereliction within Drogheda Town Centre e.g. Westgate Vision and Townscape Recovery Guide. An application for public realm works to the Westgate area has been granted by An Bord Pleanála, with the overall aim of the project to make the town centre a more attractive destination.

Tourism

It is acknowledged that the historic streets and town walls in the town centre are important features and assets which contribute to Drogheda's character and medieval past. Both Louth and Meath Council's will, in co-operation with Fáilte Ireland, continue to market Drogheda as a 'Destination Town', with the goal of increasing visitor numbers. The Draft Plan will support the progression of any projects or initiatives that will support improvements to or the regeneration of the town centre and the delivery of tourism accommodation and amenities.

The tourism potential of Drogheda is recognised, and the Draft Plan will ensure that heritage is promoted and protected to enable Drogheda to maintain its attractiveness as a tourist destination. Whilst the development of town centre performance spaces lies outside the scope of the Draft Plan the promotion of tourism as an economic driver in the town will be encouraged.

The River Boyne provides a focal point for the town, which has formed on either side of its banks. The Draft Plan will include relevant narrative and policy objectives regarding the utilisation and enhancement of the river and riverfront area for economic, recreational, and cultural uses.

The potential benefits of a pontoon on the River Boyne in Drogheda as a tourism asset in supporting jobs and developing water activities along the river are acknowledged. The Draft Plan will support the provision of such infrastructure in appropriate locations subject to compliance with the relevant planning and environmental criteria.

The Draft Plan can consider proposals for hostel and hotel accommodations at appropriate locations, subject to the relevant planning and environmental criteria being met.

Built Heritage

Laurence Gate improvement works: The Heritage Council provided funding for the preliminary public realm design concepts around Laurence's Gate in 2017 and while traffic has been redirected, there has not been a marked improvement in this space. This is a key project for Drogheda's public realm and a potential signature project to incorporate the medieval heritage into a high-quality public space. The points raised in submission in respect to the development of Laurence's Gate as an area of public realm are noted.

The importance of the regeneration and reuse of Protected Structures is recognised and there is provision for flexibility in terms of the implementation of development management guidelines.

The importance of the medieval, historic and archaeological value of Drogheda is recognised and will be set out within the Draft Plan.

The creative ideas proposed for lighting up of Drogheda's important landmarks are noted. Whilst the Plan would support initiatives and projects that would improve the public realm and attract visitor's specific events such as the illumination of landmarks falls outside the scope of the Draft Plan.

Sports & Recreational Facilities

The importance of community and sports facilities is recognised as an essential aspect in the creation of



sustainable, walkable and socially inclusive neighbourhoods within Drogheda. The Draft Plan will support the development of community and sports facilities in Drogheda subject to normal planning criteria.

The importance of recreation facilities is recognised. Both Louth & Meath Council's recognise the contribution recreational facilities make to meet the needs of Drogheda's residents. The Draft Plan will continue to support the development of recreation and sports facilities in Drogheda and will support any investment in the provision of new and existing facilities where a need has been identified.

Employment

The designation of Drogheda as a Regional Growth Centre in national and regional policy is a recognition of the strategic importance of Drogheda as a location for employment growth and economic development. The Draft Plan will support and facilitate economic investment and employment related development in the town by building on the strengths of the town, particularly its location along the Dublin-Belfast Economic Corridor and will seek to reduce the dependence on outbound commuting for employment.

Shopfronts

Shopfronts are one of the most important features in the character and perception of Drogheda's town centre. The Council are committed to promoting high quality shopfront design. The Draft Plan will seek to protect traditional and original shopfronts and ensure that any alterations do not detract from their overall integrity. The use of reproduction traditional style shopfronts on buildings ought to be avoided and instead a modern, high quality contemporary shopfront should be utilised. Applications for shopfronts shall be in accordance with the 'Shopfront Design Guidelines' for Louth County Council or any subsequent updated guidance.

Chief Executive Recommendation:

To support the implementation of various measures to counteract vacancy and dereliction throughout Drogheda urban area.

Provide policy objectives which support the provision of the Government's Town Centre First Strategy.

Provide policy objectives which support the implementation of the Living City Initiative in Dundalk and Drogheda.

To support better quality urban design and provide guidelines for shopfront design and public realm improvements.

To incorporate the findings of the Drogheda Local Transport Plan into the Draft Plan.

To support investment in sustainable transport infrastructure that will make walking, cycling or public transport more attractive and appealing, and facilitate accessibility for all, regardless of age, physical mobility, or social disadvantage.

Submission Ref. No:

LH-C144-DPIP-178

Submitted By:

Peter Shiels

Map showing land subject to Submission:



Figure 1: Extract from Dundalk Zoning map in the Louth County Development Plan 2021-2027 to illustrate the location of the lands in the context of the settlement boundary of Dundalk (Note: The red line denotes subject lands which are the subject of this submission).

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 3.02 hectares of land located at Dowdallshill, Newry Road, Dundalk, Co. Louth. The lands are currently zoned L1 Strategic Reserve and seeks them to be rezoned to A2 New Residential Phase in the current Louth County Development Plan 2021-2027 and Dundalk Local Area Plan 2024 – 2030.

Chief Executive Opinion on Issues raised:

Notwithstanding the above, the purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the new Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this submission at this stage.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then and to set out what zoning they wish to have considered on the lands in question.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.



Submission Ref. No:

LH-C144-DPIP-179

Submitted By:

Áine Walsh on behalf of Boyne Valley Walking

Summary of Main Issues Raised:

The submission relates to Recreation, Natural and Built Heritage, Tourism, Recreation, Economy and Employment.

The Boyne Valley Walking group created the 'Boyne Valley Camino', when they realised there was no long-distance, way marked trail. This has brought many people into the area and there are many opportunities to further develop this to enhance the town and the walking experience in the locality.

Boyne Valley Walking

Boyne Valley walking, co-ordinate walking festivals, organised walks, have created 4 mapped walks and the Boyne Valley Camino.

Local Authority to Maintain Boyne Valley Camino Signage

There are c.72no. signs along the Boyne Valley Camino. We would like the responsibility for the maintenance and upkeep of the signage to be taken over by Louth County Council.

The Camino route has already been altered as a result of the Obelisk being closed for a year. Details regarding 3 other potential alterations are provided.

Pill Boxes

Historical background to the Pill Boxes is outlined, it is requested that they are given protected structure status and made a feature.

Dereliction

Route in and out of Drogheda is lined with dereliction, giving a bad impression. Concerns raised regarding vacancy on Narrow West Street, strategies and policies should be devised to ensure owners renovate or surrender properties. A number of council owned buildings are not in use; this gives a bad example. Examples of other towns that have successfully tackled dereliction have been provided.

Examples of successful and potential renovation projects are provided within the submission.

Standard Street Signage/ Directional Signs

Need to be reviewed, upgraded, standardised, enhanced to help local and visitors navigate the town. LCC should support funding for conservation of old Ward signs. Milestones and jostle posts should be audited and protected.

Layers of Interest

The Boyne Valley Camino starts and finishes at St Peter's, there should be a vibrant town centre for people day and night. With cafes, bars, ice cream shops, restaurants, safe walking, safe parking, galleries, parks, seating areas, entertainment, public transport, good lighting and clean streets.

Walking and Cycling Access under the Bridge of Peace

Suggestion of a new footpath next to the apartments at the bridge of peace to connect Fr. Connolly Way out to Mill Lane.



Upgraded Walking Routes

The siting of road crossings and location of railings means that pedestrians have to cross numerous roads to get to their destination. Infrastructure has not been thought out from a walker's point of view.

Street Lighting

A review should be undertaken to ensure safety of path and road users. Routes between town centre and housing areas should be illuminated. Standard lighting designs are required and lights, should be LED or sustainable/solar powered, down lighting is preferred.

Bins

Requested that Local authority provides appropriately designed bins e.g. solar powered and automatic close.

Deposit Return Scheme Bins

Local Authority should work with Re-turn and standalone DRS machine which offer credit, system needs to be extended to public space.

Public Toilets

There is a lack of public toilets along the Boyne Valley Camino – the implementation of some public toilets that are maintained year-round would be welcome.

Coffee Cups

Implementation of town wide reusable coffee cup scheme examples of existing and proposed initiatives are provided.

Building Height

Tall buildings should be sited in appropriate locations i.e. low-lying areas with no impairment on views e.g. Scotch Hall/Marsh Road area. The high rise at the Bridge of Peace completely blocks views and destroys the skyline, the height is out of context.

All new buildings should have a high eco rating.

Former quarries on the Old Slane and North Road are a haven for wildlife reference is made to, 'Other Nations – Biodiversity at the Old Cement Quarry, Drogheda Co. Louth' and the species found therein. The Issues Paper refers to habitat management.

Drogheda Tidy Towns are lobbying for this area to be designated for biodiversity and nature. Area could be used for school trips with minimal interventions, allowing it to survive as a green lung in an otherwise built-up area. The area is part of the Camino route.

Examples of urban roosts i.e. areas where biodiversity should be encouraged, are provided. Reference is made to the 'All Ireland Pollinator Plan'.

Suitable trees should be incorporated into new road plans.

The River Boyne

The River Boyne is tidal in Drogheda, is an SPA, SAC and Ramsar site this should be treated with respect ensuring protection of species who live and visit it. Flooding should be investigated, understood and mitigation measures put in place. The Westgate Vision looks for the town to re-orientate towards the river. The ramparts and board walk to Oldbridge is a great river walk resource. We would encourage more walking / cycling trails which are respectful of nature.



Ancient Riparian/Alluvial Woodlands

Boyne River Trust work should be supported regarding the protection of these woodlands.

Leisure Facilities

The diversification of Drogheda's green spaces could include access to new activities and small sports facilities.

Louth Nature Trust

The Little Terns conservation project in Baltray should be supported by Louth County Council.

Views

Certain locations should be designated views. Drogheda has great typography which provides elevated views, examples are Millmount, Highfield Hill, Grove Hill, Mount St Oliver, top of Peter Street, the steps to the viaduct side of the train Station and others.

Boyne Valley Walking join with other groups under the umbrella group of Boyne Valley Trails. Drogheda is a 'backdrop' to frame walks.

Drogheda's Heritage

During developments like the Dale and other projects in Drogheda, robust collaboration surrounding wildlife corridor protection should be considered.

Chief Executive Opinion on Issues raised:

It is acknowledged that Drogheda serves a wide hinterland.

The responsibility of signage maintenance falls beyond the remit of the County Development Plan.

A review of the Record of Protected Structures (RPS) is currently being undertaken by Louth County Council in conjunction with the review of the County Development Plan. There will be an opportunity for submissions to be made during the review period to request that 'Pill boxes' be added at the relevant RPS, at that juncture.

The challenges facing Drogheda town centre with regard to vacancy and dereliction are acknowledged. In response to these challenges Louth County Council has initiated a range of projects that will seek to re-invigorate the town centre, improve occupancy and enhance the public realm.

Both Louth and Meath County Council acknowledge the importance of creating a town which is accessible and inclusive for all. The County Development Plan will continue to support policies surrounding the investment and maintenance of public footpaths and cycleways to improve safety and connectivity.

Both the Louth County Council encourage re-use and recycling; this will be carried forward in the County Development Plan.

To assist in ensuring compact growth and to support more sustainable patterns of development, the County Development Plan will identify areas that are likely to be suitable for buildings of height, in all instances regard will be given to the context of the existing built environment.

The County Development Plan will support sustainable building practices which reduce carbon emission at both construction and operational phase. The ecological value of the former quarries along the Old Slane and North Road and, the Boyne River is fully recognised. The Plan will include a section on Drogheda's green infrastructure and policy objectives will be provided on how it can be protected and enhanced. Planting of native trees will also be encouraged in suitable locations.

An update to the Strategic Flood Risk Assessment will be carried out in conjunction with the County Development Plan, in order to meet the objectives of proper planning and sustainable development,



justification tests will be carried out as required.

Chief Executive Recommendation:

To further strengthen connectivity and protection policies in Drogheda and continue a scheme of regeneration and town-centre first development to ameliorate Drogheda town centre.

Submission Ref. No:

LH-C144-DPIP-180

Submitted By:

Office of the Planning Regulator (OPR)

Summary of Main Issues Raised:

The OPR submission welcomes the publication of the Issues Paper and the Council’s commencement of the review of the County Development Plan.

Note: The regional assemblies are now required to initiate a review of the Regional Spatial and Economic Strategy (RSES). This process is likely to run concurrently with the review of your County Development Plan. It will be essential therefore that Louth County Council (Planning Authority) works with the Eastern Midland Regional Assembly (EMRA) to ensure effective coordination between regional and local policy.

The Office has set out some comments to consider in formulating the Draft County Development Plan.

Consultation Strategies

The Office commends the Planning Authority for the strategies used to inform the public about the review of the County Development Plan which includes five in-person evening public workshops relating to the development plan process and the use of social media to provide further information and updates.

Core Strategy and Settlement Strategy

The formulation of the core strategy in line with section 10 of the Act is the most significant element in the new Plan. The revised NPF and the RSES, any relevant Specific Planning Policy Requirements (SPPRs) under section 28 of the Act and any National Planning Statements published under section 25 of the 2024 Act, will be key determinants in making the core strategy.

The Planning Authority will also be aware of the Housing Growth Guidelines which identify a new annual housing growth requirement for County Louth of 1,677 between 2025-2034 and 1,195 between 2035-2040. When zoning land for residential development, Policy and Objective 2 of the Housing Growth Guidelines requires an additional provision of up to 50% above the specified housing growth requirements. This headroom is intended to ensure that development plans provide an adequate supply of residentially zoned land to facilitate housing delivery.

The Office advises that a significant proportion of the county’s future population growth and housing targets should be allocated to the Regional Growth Centres of Drogheda and Dundalk consistent with NPO 15 of the NPF and RPO 3.1 of the RSES, on lands that can be activated within the plan period to provide for sustainable communities.

Compact Growth and Zoning

Compact growth is one of the National Strategic Outcomes of the NPF, with a target of at least 30% of all new homes that are targeted in settlements, within their existing built-up footprints and ensure compact and sequential patterns of growth.



The Planning Authority should prioritise compact growth and development within the two Regional Growth Centres of Dundalk and Drogheda.

New housing should be delivered in areas that are well serviced by social and physical infrastructure. A Settlement Capacity Audit should inform any land use zoning objectives. Planning Authorities should distinguish between lands that are serviced and those that are serviceable.

Lower Tier Plans

The Office highlights that on the commencement of part 3, chapter 6 of the 2024 Act relating to urban area plans, priority area plans and coordinated area plans, Section 19 of the 2000 Act will be replaced, and land use zonings will only be considered as part of the county development plan preparation process.

The Office advises the Planning Authority to identify in the Draft Plan those settlements for which it is intended to prepare an urban area plan, priority area plan or coordinated area plan, in order of priority. As recognised by the RSES, the preparation of a joint urban area plan for Drogheda and its environs to be prepared by Louth and Meath County Council is a priority.

The Office acknowledges and welcomes that work has already commenced on the preparation of the Drogheda urban area plan with respect to the necessary environmental assessments and that a Local Transport Plan (LTP) is currently being prepared by both Louth and Meath planning authorities in collaboration with the National Transport Authority (NTA).

Economic Development and Employment

County Louth is well positioned along the Dublin-Belfast Economic Corridor providing excellent transport links to both cities via the motorway, national roads and inter-city rail line.

The Draft Plan should consider how it can prioritise employment and economic potential of the county and support the effective planning and development of large centres of population and employment along this economic corridor, particularly the Regional Growth Centres of Drogheda and Dundalk, together with recognising the cross-border network opportunities for regional development at these locations also.

Transport

The Issues Paper recognises the importance of Louth's extensive transportation network, with excellent road and rail links, ports, and its close proximity to airports. Louth is well positioned along the Dublin-Belfast Economic Corridor with the introduction of hourly services between Dublin and Belfast at key parts of the day further improving rail connectivity in the county.

There are a number of key projects in the pipeline that will directly benefit the county including the DART+ Coastal North Project.

The Office advises that specific objectives and policies should be included in the Draft Plan to further reduce the reliance on the car and promote the use of sustainable modes of transport thus achieving reductions in the greenhouse gas emissions and energy use.

The Office notes that there are several active travel projects that are being advanced in the county which will seek to improve walking and cycling infrastructure and promote sustainable transport thereby aligning with NPO 36, NPO 37, NPO 60 and NPO 93 of the NPF.

Infrastructure

The Office advises the Planning authority to work proactively with Uisce Éireann to progress projects that deliver infrastructure for the county's settlements and support development in strategic development areas consistent with the NPF and RSES.



Urban Regeneration

The NPF recognises that the regeneration and rejuvenation of towns and villages of all types and scale can play a role in making stronger urban places and contribute to compact growth.

The Office strongly advises that very clear, targeted measures for further regeneration throughout the county are incorporated into the Draft Plan.

Rural Housing and Land Activation Measures

Important to include appropriate policies and objectives to manage the related urban generated growth by ensuring that single houses in the rural areas are based on a demonstrable economic or social need to live in the rural area in accordance with RPO 4.80 of the RSES. The continuation of a car-dependant pattern of development is contrary to the mandatory requirements for sustainable settlement and transportation strategies to reduce energy demand objectives under section 10(2)(n) of the Act.

It is important that the County Development Plan provides a strong policy framework to proactively address issues of town/village decline and compact growth while protecting against urban generated housing in open countryside. Land activation measures should be prioritised in various settlements to alleviate pressure on the open countryside through the provision of a desirable alternative to one-off housing for those who would like to reside close to the facilities, services and amenities available in rural towns and villages while maintaining ties to the wider rural community.

Strategic Flood Risk Assessment

The Planning Authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the County Development Plan, consistent with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The Planning Authority should ensure that it has regard to the detailed requirements and provisions of these guidelines, including the staged approach to flood risk assessment and in particular, the application of the sequential approach and the requirement to carry out the Plan Making Justification Test (Justification Test).

Climate Action and Energy

The Office acknowledges and welcomes the Planning Authority's Climate Action Plan 2024-2029 (CAP) which will further enhance County Louth's ability to lead, engage and coordinate the response to the ongoing climate crisis and provide opportunities to implement climate mitigation.

The Office also recognises and welcomes Dundalk as County Louth's chosen Decarbonising Zone which will be the county's pilot location to test and implement a range of climate mitigation and adaptation measures at a local level. The County Development Plan should include supporting policies and objectives in relation to same.

The Planning Authority will need to ensure that the County Development Plan incorporates comprehensive policies and objectives that promote renewable energy developments at appropriate locations to address the national objectives more generally and, more specifically, the renewable energy targets for County Louth when published, in order to achieve a climate neutral economy by 2050 in accordance with NPO 67, NPO 70 of the NPF and RPO 6.23 of the RSES.

Education, Social and Community Amenities

The County Louth Local Economic and Community Plan 2024-2029 and Louth Traveller Accommodation Programme 2019-2024 should be considered to provide for the co-ordinated spatial planning of housing and community services for the county.

NPF identifies access to quality childcare, education and health services under NSO 10. Population growth should be aligned with investment in childcare and education facilities on well-located sites within or close to the



existing built-up areas.

The Planning Authority should consult with Forward Planning Section of the Department of Education and the Louth County Childcare Committee to determine the requirement for additional educational and childcare provision having regard to the emerging core strategy and associated housing growth requirements.

Implementation and Monitoring

The submission sets out a number of suggestions in relation to implementation and monitoring including the SMART approach, the forthcoming OPR Practice Note PN06 Development Plan Monitoring, setting out specific provisions for monitoring the implementation of objectives in the Plan and implementing approaches to measure and monitor compact growth to align with increased digitisation of the planning system.

Summary

The submission advises the planning authority to take particular account of the following in the preparation of the County Development Plan:

- Climate Action Plan & objectives of the NPF & RSES.
- Joint Urban Area Plan / Coordinated Area Plan for Drogheda to be progressed with Meath County Council as a priority.
- Housing Growth Guidelines should inform the housing growth requirements of the Core Strategy for County Louth
- Population growth should be directed under the proposed settlement Strategy to Regional Growth Centres of Dundalk & Drogheda.
- Further distribution of housing growth must be evidence based to the other settlements in the settlement hierarchy and align with Development Plan Guidelines and RSES.
- Prepare a settlement Capacity Assessment along with an Infrastructure Capacity Assessment for all residential zoned land identifying enabling infrastructure.
- Residential zoning in towns and villages should be consistent with core strategy and with national and regional policy on compact growth, infrastructural capacity and the sequential approach to development.
- An infrastructure capacity assessment should also be carried out for enterprise and employment zoned lands. The approach to zoning for enterprise and employment uses which should reflect the economic strategy of the County Development Plan and be evidence based.
- Policies and objectives should ensure that the benefits of existing and planned public transport investment are maximised as well as indicate how modal share targets are to be achieved over the plan period.
- An evidence-based approach should be followed in the development of rural housing policies and maps to ensure consistency with NPO 28 of the NPF and to support the regeneration and rejuvenation of rural villages and towns.
- Need to prepare a Renewable Energy Strategy and to develop a policy framework to support renewable energy particularly solar and wind energy consistent with the RSES and NPO 74 of the NPF.
- Emphasis should be placed on the implementation and monitoring of County Development Plan objectives including housing and supporting infrastructure delivery ensuring consistency with Government priorities.

Chief Executive Opinion on Issues raised:

The Chief Executive acknowledges the requirement for the Development Plan to be consistent with national and



regional policy.

It is noted that the review of the Regional Spatial and Economic Strategy for the Eastern and Midlands Region is likely to run concurrently with the review of the Louth County Development Plan. The Chief Executive will ensure that the Forward Planning Team will liaise closely with the Eastern and Midlands Assembly (EMRA) in the preparation of the Draft Plan.

The Draft Plan will include a list of lower tier plans to be prepared in the County. The preparation of a Joint Plan with Drogheda will continue to be a priority.

The housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft County Development Plan. The distribution of this housing will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a ‘Settlement Capacity Audit’ to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Draft County Development Plan Review and was ongoing at the time of writing.

Climate action shall continue to permeate all aspects of the new Plan.

The Draft Plan will be consistent with national and regional planning policy, and the Chief Executive recognises the importance of National Planning Objective 18(b) of the NPF which seeks to reverse rural decline by creating serviced sites in small towns and villages for self-built homes. The Draft Plan will support and facilitate rural regeneration through the provision of policy objectives in relation to same.

The importance of its strategic location along the Dublin-Belfast Economic Corridor will continue to drive growth and the Draft Plan will seek to support the continued growth of both Dundalk and Drogheda as Regional Growth Centres and provide a policy framework for the settlements to ensure they will be able to realise their economic and employment potential and develop into centres of scale that can facilitate population and economic growth.

The Draft Plan will support the progression and delivery of key transport projects in the County including DART+ Coastal North. The Plan will also support the delivery of any projects listed in the Dundalk Local Transport Plan and the Joint Local Transport Plan for Drogheda (currently under preparation).

The Draft Plan will identify the challenges facing town and village centres and will include policy support for urban regeneration projects that will assist in reducing vacancy and creating more attractive and liveable spaces in the urban core of settlements throughout the County.

To continue to provide for Policy Objectives and associated narrative text which support the concept of ‘Town Centre First’ and promote compact development and reduce reliance on car-oriented development.

The Council will continue to engage with the Department of Education in relation to school provision throughout the County.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional



policy and guidance.

To include relevant policy objective(s) to continue to support the growth and expansion of Drogheda and Dundalk, as designated Regional Growth Centres, in a sustainable manner.

To include a policy objective supporting the preparation of a Joint Plan for Drogheda with Meath as a priority.

Incorporate the housing allocation for Louth as provided for in the 'NPF Implementation: Housing Growth Requirement Guidelines' into the Core Strategy of the Draft Plan.

To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

To include policy support for the recently published housing plan 'Delivering Homes, Building Communities 2025-2030'.

To include relevant policy objective(s) to support and facilitate rural regeneration such as identifying opportunities for serviced sites within settlements.

To review all existing lands zoned for residential use to take account of current land uses, with consideration being given to the likelihood of housing being delivered on said lands.

To support the implementation of a policy of compact growth in accordance with the National Strategic Outcomes in the National Planning Framework

Submission Ref. No:	LH-C144-DPIP-182
Submitted By:	Trevor Kirwan

Summary of Main Issues Raised:

The submission requests a review of Local Needs guidelines and sets out the following justification for this request:

- Review local needs qualifying criteria as they relate to people who have deep, long-standing ties to the community but currently do not qualify to build in the rural area if they live within the boundary of defined settlement.
- The submission sets out their situation: lived in Clogherhead all their life, seeking to build on a site 2km away which they have owned for 13years, long-standing family ties to Clogherhead, attended school in the rural area of Clogherhead and involved in local sports in the rural area outside Clogherhead. However, as Clogherhead is classed as an 'urban area', it excludes local people from building outside the settlement boundary.
- Consider that while Clogherhead has grown, it remains a village with strong rural characteristics and the planning policy should reflect this and should support families willing to building on their own land.
- The criteria for determining genuine local need should be broadened, giving greater recognition to long-standing community ties and provide a more flexible and inclusive policy to better reflect the realities of rural in Louth.
- Review the classification of Clogherhead as an urban area to ensure fairer application of rural planning policies.

Chief Executive Opinion on Issues raised:

The settlement hierarchy for County Louth is prepared in line with the evidence-based growth and settlement



strategy and policy requirements contained in national and regional policy. The focus of the NPF growth strategy is on compact growth, with development directed to existing settlements to prevent sprawl and unsustainable growth in the rural area.

Clogherhead was classified as a Self-Sustaining Town within the LCDP 2021-2027 in line with the Settlement Strategy requirements contained within the Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031.

The Chief Executive notes the concerns in relation to local needs qualifying criteria and the impact on the current criteria on applicant's who have lived within the boundary of defined settlements.

The Draft Plan will review all settlement designations and policies in relation to growth both within the existing settlements as well as reviewing the qualifying criteria and policy provisions in relation to rural housing. The Draft Development Plan will continue to be required to align with national and regional policy and guidelines.

Chief Executive Recommendation:

The Draft Plan will include a Core Strategy and Settlement Hierarchy for the County and policy guidance in relation to housing and population targets which will be in prepared in accordance with the Core Strategy and Settlement Hierarchy of the Draft Plan.

Review policy relating to the qualifying criteria for one-off rural housing which will be informed by national and regional guidance.

Submission Ref. No:

LH-C144-DPIP-183

Submitted By:

Kilsaran Concrete Unlimited Company

Summary of Main Issues Raised:

The submission provides a history of the company and its operations and sets out that the long-term role of the quarry should be a key consideration in the Louth County Development Plan 2027–2033.

The Importance of Aggregates

The submission sets out that a supply of aggregates are required to meet the County's needs for:

- **Housing** e.g. Target of 1,677 housing units by 2034.
- **Energy** e.g. Utilising both land and sea to meet the growing demands of the county.
- **Transport** e.g. Dart+ Coastal North Project, Narrow Water Bridge project.
- **Water** e.g. Adequate water and wastewater infrastructure to meet the needs of future development.
- **Education** e.g. DkIT partnering with Queens University Belfast to establish University College in Dundalk.
- **Health** e.g. Healthcare facilities to meet the needs of the ageing population.
- **Agriculture** e.g. Protecting rural character.
- **Industry** e.g. Pro-business environment and investment destination due to location on the Dublin- Belfast Corridor.

Louth's unique identity lies in its location as a key corridor to Northern Ireland. To realise Louth's growth potential, local aggregate reserves are essential. However, planning delays and supply chain issues threaten



housing delivery and infrastructure development. With limited high-quality aggregate resources, safeguarding future access is critical to meet demand and support national strategies such as Project Ireland 2040 and Delivering Homes, Building Communities 2025–2030.

The Irish Concrete Federation (ICF) estimates that Project Ireland 2040 will require about 1.5 billion tonnes of aggregates to meet its targets. The Delivering Homes, Building Communities 2025–2030 initiative aims to build over 300,000 new homes by 2030. According to an RPS study, a typical three-bed semi-detached house needs 300 tonnes of aggregates, meaning Louth’s target of 1,677 homes annually (2025–2034) will require roughly 503,100 tonnes per year. Currently, aggregate replenishment is lagging consumption, creating a risk for housing and infrastructure delivery. Reliable access to high-quality aggregates is essential for achieving national plans like Project Ireland 2040 and housing strategies. Protecting raw material supply chains is critical for Ireland’s future development.

Policies

The current Louth County Council Development Plan 2021-2027 list a range of policies (ENV 41-47) within section 11.4.2 *Extractive Industry*. They recognise that the county contains a ‘variety of natural resources such as raw materials critical to the construction industry’.

A Strategic Approach to the Protection of Aggregate Reserve

A national coordinated approach is needed to safeguard land with finite aggregate reserves amid competing land-use pressures. County Development Plans must include measures to ensure replenishment of aggregates for local and regional needs. The ICF warns of emerging shortages in sand and gravel in eastern and midland regions as reserves diminish. Louth’s current Development Plan (2021–2027) acknowledges that extraction can only occur where reserves exist.

For the 2027–2033 Plan, the Council should:

- Introduce stronger controls on development near proven deposits.
- Designate Strategic Reserve Areas with significant aggregate resources and assess nearby development applications which may limit future extraction.
- Recognise strategic sites like Gallstown Quarry and other high-potential areas.

This approach will secure raw materials for infrastructure and housing, reduce fuel usage, construction costs, and CO₂ emissions by ensuring local access.

Industry stakeholders support enhancing Policy Objective ENV 43, with the suggested wording “*to protect areas of strategic reserves, prohibiting development that would hinder the efficient or effective recovery of the County’s aggregate resources.*”

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the important function and role that the quarrying, concrete and aggregate sector have on the county, which is fundamental in delivering key infrastructure and development for the county and wider country.

As noted within the submitters response, the LCDP 2021-2027 includes a dedicated narrative and policy provisions for the extractive industry. The Chief Executive also notes the national, regional and local targets for housing and infrastructure projects that require delivery to progress Ireland to delivering sustainable economic growth and meet population projections.

The bullet points as noted above will be examined in detail, as it is accepted that the county possesses a finite amount of natural resources, and relevant policy provisions, narrative, and land zonings will be formulated



accordingly. Existing policies will also be reviewed and updated accordingly.

Chief Executive Recommendation:

Review the existing policies within the LCDP 2021-2027 and have regard to the aforementioned bullet points in the submitters response, develop policy objectives, narrative and zonings to ensure the secure and reliable supply of raw materials for development within the county and wider region.

Submission Ref. No:

LH-C144-DPIP-184

Submitted By:

Eunice O'Neill

Summary of Main Issues Raised:

Submission seeks that Blackrock be designated as a strategic reserve given its environmental sensitive location, coastal vulnerability and distinctive village character.

Sensitive Location

Blackrock is located adjacent to the Dundalk Bay Special Protection Area (SPA) and Special Area of Conservation (SAC), which are protected under the EU Birds and Habitats Directives. The mudflats, wetlands, intertidal zones, and associated bird habitats form part of the ecological network that supports these Natura 2000 sites. Any development in or near these areas' risks undermining the ecological integrity and conservation objectives of the SPA and SAC, contrary to the Habitats Directive and Appropriate Assessment obligations.

Environmental Objectives

The Louth County Development Plan 2021-2027 contains clear objectives to protect coastal landscapes, maintain biodiversity, safeguard Natura 2000 sites, and preserve the character of established settlements. Blackrock's unique village identity, heritage value, and coastal setting are directly aligned with these objectives.

Overdevelopment of Sites

Overdevelopment, particularly high-density or profit driven development, would conflict with Plan policies on settlement pattern, landscape protection, and sustainable coastal management.

Flooding

Blackrock is an area of coastal flood risk and is subject to the impacts of storm surges, tidal flooding, and projected sea-level rise. The Planning System and Flood Risk Management Guidelines (DoEHLG, 2009) state that high-density or inappropriate development in such areas is contrary to proper planning and sustainable development. Increasing residential density in flood-prone or climate-vulnerable coastal zones is inconsistent with the principles of climate-resilient planning and the County Development Plan's Climate Action objectives.

Local Infrastructure

Local infrastructure capacity is also limited. Existing transport routes are constrained and already experience congestion during peak times. Community facilities, utilities, and services are not designed to absorb large-scale housing expansions without significant adverse impacts on the quality of life for existing residents.

Recommendations

The submission requests that Blackrock and its environs be recognised as an area requiring strict protection, and that it be designated as a strategic reserve to ensure that coastal landscapes, biodiversity, and community



identity are safeguarded for future generations. Sets out that large-scale or inappropriate development in this area that would be contrary to the proper planning and sustainable development of the locality and would undermine both national and local policy objectives.

Chief Executive Opinion on Issues raised:

Sensitive location

Blackrock has a sensitive location in respect of its coastal location close to two protected European Natura sites. There is a strong policy framework in the Plan supporting the protection and conservation of European and other biodiversity sites. The Louth County Development Plan 2021–2027 contains clear objectives to protect coastal landscapes, maintain biodiversity, safeguard Natura 2000 sites, and preserve the character of established settlements.

Overdevelopment of Sites

The Dundalk Local Area Plan, which was adopted on the 6th March 2025, included Blackrock-Haggardstown area within its settlement boundary and also recognises the contribution of the Blackrock area in facilitating residential and employment related development and the future potential of the town. The Draft County Development Plan will be prepared having regard to the Dundalk LAP.

The Chief Executive notes the concerns in relation to overdevelopment of sites. Securing densities appropriate to achieve sustainable and compact growth, particularly in Regional Growth Centres like Dundalk is mandated by national, regional and local planning policies. The Sustainable Residential and Compact Settlement Guidelines (DHLGH, 2024) set out the recommended densities, and the Draft Plan will provide policy support and guidance in relation to densities and compact growth. The assessment of the suitability of a proposed development is undertaken by the Development Management section and is subject to all other planning considerations.

Flooding

The Chief Executive recognises the importance of flood risk management in the plan preparation process. A Strategic Flood Risk Assessment will be carried out in conjunction with the Draft Plan, to meet the objectives of proper planning and sustainable development, and justification tests will be carried out as required. The most recent flood mapping data will be used to inform the SFRA.

The Draft Plan will recognise the importance of the Flood Relief Schemes within the County and will include policy objectives supporting the progression and implementation of these projects.

Community Infrastructure

The distribution of the housing allocation in the core strategy of the Draft Plan will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development.

Chief Executive Recommendation:

To carry out a Strategic Flood Risk Assessment (SFRA) for the County which will be prepared in accordance with the requirements of 'The Planning System and Flood Risk Management Guidelines' (2009).

To support the implementation and delivery of the Dundalk, Blackrock Flood Relief Scheme.

To incorporate the housing allocation for Louth as provided for in the 'NPF Implementation Housing Growth Requirement Guidelines' into the Core Strategy of the Draft Plan.



To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

To include relevant policy objective(s) to continue to support the growth and expansion of Dundalk (including Blackrock), as a designated Regional Growth Centre, in a sustainable manner.

Submission Ref. No:

LH-C144-DPIP-185

Submitted By:

An Taisce – The National Trust for Ireland

Summary of Main Issues Raised:

Overarching Comments

Implementation

The Draft Plan should include robust targets, actions and measures to achieve the implementation of policies contained therein. By setting targets, corrective action can be taken if they are not being met.

Underlying Premise of the New Plan

The new CDP should establish a planning and land-use framework that delivers public goods, meets societal needs, and promotes long-term social and environmental wellbeing. Development must ensure that people can live well within the principles of justice, intergenerational equity, and sustainability. Kate Raworth's Doughnut Economics framework is recommended.

Climate Crisis

Transition to a decarbonised society is a key planning policy for County Louth and it is imperative that the new CDP takes a lead role in its delivery. Reconciliation of the forthcoming CDP against the carbon budgets will therefore be required.

Climate Act Obligations on Public Authorities

Compliance with Section 15 of the Climate Action and Low Carbon Development Act 2015 and other Climate Act obligations needs to be demonstrated throughout the new CDP. The should CDP contain a specific assessment of the Plan in this regard.

Just Transition

There is a need to move towards decarbonisation and away from fossil fuels and emissions-intensive industries. Ensuring a just transition should therefore be a guiding principle in the new CDP

Flooding

Flood relief schemes should be ecologically sensitive. Catchment level measures should be considered, deepening river channels is not always successful and consideration should be given to allowing flooding of agricultural land holdings.

Biodiversity Crisis

Biodiversity loss crosscuts all sectors and areas. It is recommended that the protection, restoration and enhancement of biodiversity play a central role in the Plan. Numerous reports and studies have found the severe decline in Ireland's biodiversity. The management of surface and ground water in accordance with the provisions of the Water Framework Directive (WFD) and Groundwater Directive will be a challenge. The new CDP has a role to play in protecting and enhancing biodiversity.



Specific and targeted objectives and measures on reversing biodiversity loss and ecosystem restoration need to be included. The new CDP should be aligned with the new National Biodiversity Action Plan and EU Nature Restoration Law, and the relevant recommendations of the Citizens' Assembly on Biodiversity Loss.

People and Place: Sustainable Settlement

It is crucial the CDP drives compact, serviced neighbourhoods which reduce car dependency, and contains provisions for the development of the 15-minute city. The prioritisation of future development in Louth's towns towards efficient, compact, walkable, and serviced locations in accordance with the sequential approach and existing infrastructural capacity is imperative. Land should not be zoned if it is not serviceable within the Plan period. The CDP should incorporate and enhance the seven location test standards for new housing in urban areas as outlined in the National Spatial Strategy 2002.

Reconciling Home Construction with Climate Obligations

The CDP should assess how the level of home construction needed to address the housing crisis can be facilitated while staying within the limits of our emissions reduction obligations. Mandatory life-cycle carbon measurement or mandatory measurement of embodied carbon in construction should be considered.

Settlement Patterns and Wellbeing

The new CDP should recognise the links between spatial planning and health and wellbeing as well as importance of well-connected places, active travel, etc. To realise this, CDP policies and objectives regarding compact settlement, integrated land use and transport planning, etc. are crucial. Revitalisation of rural towns should also be addressed.

Transport, Connectivity and Movement

Integrating Land Use and Transport

The fact that compact growth and sustainable mobility policies are not always translating to better planning applications and decisions must be addressed in the new CDP.

Achieving a Modal Shift

With regard to new roads infrastructure priority focus should be given to:

- Reallocating road space and reconfiguring junctions for bus priority measures.
- Ensuring there are safe parallel routes for active travel users (e.g. with greenways or cycleways or high-quality segregated facilities).

Policy objectives should include:

- Inclusion of the findings of the All-Island Strategic Rail Review.
- Provision of high-quality interchanges to allow for intermodal journeys involving bikes and public transport.
- Requirement for active travel/cycle infrastructure audits for all major housing and developments.
- Requirement for all significant residential/employment developments to include well located, high quality, secured, sheltered and high-capacity bicycle parking.
- A plan for clear signposting to all bus and train stations within towns.

Detailed and specific targets and timelines for achieving a modal shift should be included.

Water and Energy

Water

A specific objective is to compliance with the EU Water Framework Directive (WFD).



Energy

CDP should contain an objective that all planning and development of renewables must be sustainable, compliant with national, European and international legal obligations and recognise the intertwined nature of the climate and biodiversity crises.

Though the planning for the regional renewable electricity capacity allocations as required by the Revised National Planning Framework is only beginning, new CDP should consider how it will address this as well as the national territory mapping for renewables as required by the Recast Renewable Energy Directive (REDIII).

No further permissions should be granted for fossil fuel-based energy production. Robust public engagement is essential

Rural Development

Plans often include objectives for the development of rural areas in a sustainable manner that is aligned with climate and biodiversity objectives and for promoting sustainable agriculture, forestry, etc. rigorous application is required. The new CDP should include targeted policies to curtail the unsustainable spread of one-off dwellings in the countryside, particularly for urban-generated demand.

Natural and Built Heritage

A review of all existing land zoning provisions is required to ensure the protection of the setting of archaeological monuments and complexes under the Valletta Convention, and of landscape generally under the European Landscape Convention.

The new CDP also needs be informed by the National Landscape Character Assessment, the National Inventory of Architectural Heritage, and the associated inventory of Historic Gardens and Designed Landscapes. The CDP should also focus on conservation and adaptive reuse of Louth's vacant heritage building stock. Heritage buildings at risk of endangerment should be monitored.

Tourism

Longer area-based stays should be encouraged rather than a high-volume car trips and drive-through tourism. Such goals should include:

- Increasing the access to public transport, walking and cycling options from key tourist destinations and accommodation hubs.
- Increasing and improving the options for car-free, long-stay trips.
- Locating new accommodation and tourist facilities in areas with existing services, infrastructure and transport links to amenities; and
- Making tourist areas less focused on private car use and more accessible for public transport, walking and cycling.

Any tourism project should not have an indirect or cumulative adverse impact on the quality and character of the host location and wider area.

Strategic Environmental Assessment

The Strategic Environmental Assessment (SEA) Directive 2001/42/EC requires that an environmental assessment is carried out for the CDP.

Article 10 of the SEA Directive sets out provisions for the monitoring of a plan or programme subject to SEA and the obligation for remedial action where unforeseen adverse effects arise.

A proper interpretation of Article 10 of the SEA Directive requires that the SEA monitoring process be based on quantitative, audited data and that qualitative data be provided on an ongoing basis during the lifetime of the



plan or programme.

The SEA Environmental Report should contain clearly identified, timetabled and targeted mitigation measures; effective monitoring proposals in all areas; and a legal implementation regime to take remedial action where adverse effects are identified through monitoring.

Chief Executive Opinion on Issues raised:

The Chief Executive welcome the comments and guidance from the An Taisce and recognises the importance of our natural environment and the need to safeguard and protect it from negative factors. Our natural environment not only provides biodiverse habitats for plants and species but provides a valuable resource to our own health and wellbeing. The Council recognises that Ireland, and the wider world, has been experiencing sustained extreme weather events and that our climate has been gradually warming in temperature, and understands our role in relation to the Climate Action and Low Carbon Development Act 2015.

The current LCDP 2021-2027 contains a range of narratives, policy objectives, zonings, and a suite of environmental reports which seek to protect and enhance our natural environment, mitigate and adapt to climate change, and protect more integrate land use and transport. The above comments, guidance, legislation and sources are of great benefit to the Council and will be used to inform the drafting of the new Plan, and which will permeate across every chapter. Louth County Council will seek to implement this range of information and recommendations as key sources within the new Plan.

The Draft Plan will be accompanied by the necessary environmental reports including Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

Chief Executive Recommendation:

To consider the recommendations set out in the submission when preparing the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-186

Submitted By:

Niamh McParland

Map showing land subject to Submission:

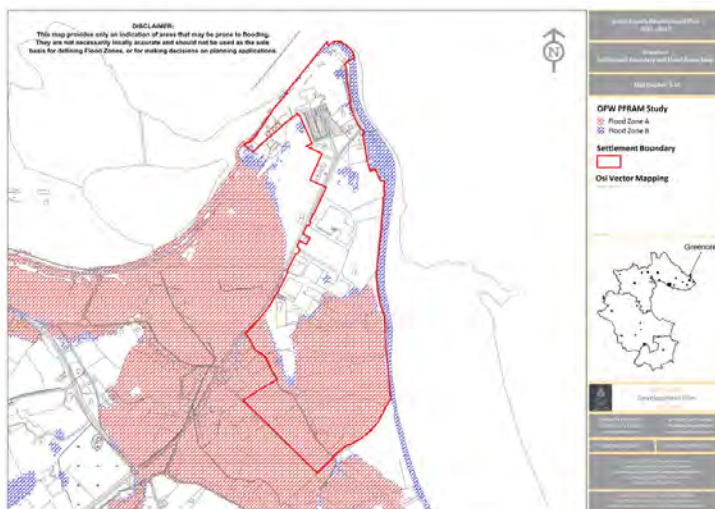


Figure 1: Copy of Greenore settlement boundary map the Louth County Development Plan 2021-2027.

Summary of Main Issues Raised:

The submission sets out that the settlement boundary of Greenore should remain the same as the size settlement is sufficient.

The submission also sets out that coastal erosion prevention measures, such as a rock armour scheme, should be considered for the southern end of the Greenore settlement boundary. The coastal barrier wall at this end is badly damaged and requires support. This should be included in the next development plan.

Chief Executive Opinion on Issues raised:

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan.

In relation to the settlement boundary of Greenore, the Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the future growth of the settlement over the Plan period. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the settlement boundary of Greenore in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

The Chief Executive recognises the importance of flood risk management and the need for coastal erosion protection measures. A Strategic Flood Risk Assessment (SFRA) for the County will be prepared as part of the Draft Plan in accordance with the requirements of 'The Planning System and Flood Risk Management Guidelines' (2009). The Draft Plan will have regard to the findings and recommendations of the Strategic Flood Risk Assessment and will also recognise the importance of Flood Relief Schemes and Coastal Protection Works



and will include policy objectives supporting the progression of such schemes within the County.

Any future Flood Relief Schemes or Coastal Protection Works will be subject to a separate public consultation process.

Chief Executive Recommendation:

To examine the level of development in rural nodes including Greenore, taking account of the level of services currently available, the landscape in which the settlement is located, the availability of water services infrastructure, and the quality of the local road network.

Undertake a Strategic Flood Risk Assessment (SFRA) for the County in accordance with the requirements of 'The Planning System and Flood Risk Management Guidelines' (2009), using the most up to date flood data.

Include relevant policy objectives based on flood data to support the implementation of flood relief schemes and coastal protection works in the County.

Submission Ref. No:

LH-C144-DPIP-188

Submitted By:

Dunleer Sustainable Energy Community

Summary of Main Issues Raised:

Executive Summary

Proposal is to address the increasing CO2 emissions in County Louth by actively engaging local communities, with a primary emphasis on transport-related challenges. Information is provided regarding CO2 emissions and private car usage in Louth. The proposal is to advance local shifts towards sustainable transport options. The submission outlines the three initiatives of a programme to reduce private transport use and what it will achieve. It is stated that the approach aligns with the Climate Section of Louth County's Development Plan 2021–2027 and the Climate Action Plan CAP 23.

Delivering on National and Local Objectives:

The acceleration programme will employ best practices and implement several climate change action plans focusing on the three principal components of the Climate Action Plan CAP 23.

Background to Dunleer Sustainable Energy Community (DSEC):

Background to the Dunleer Sustainable Energy Community is provided and also groups working in collaboration. A table is provided outlining Actions to Date, the Energy Information Programmes and Impact.

Louth Transport Acceleration Programme Details

The purpose of the programme is outlined and how it is intended to:

(1) Enhance Transport Services namely by improving electric bus services, reopening Dunleer station, expanding bicycle rental, as well as train and bus upgrades.

(2) Inform and inspire by helping people make smarter choices about energy. Workshops were held and information from various academic institutions was utilised. It is planned to expand workshop content and deliver to/engage more community groups.

Resources required:



The necessary resources for improving the transport network will be identified by the national and local authorities responsible for these services. The proposed delivery of information workshops is outlined.

Louth County Development Plan

Reference is made to the Chapter 12 Climate Action in the Louth County Development Plan. Policy Objectives CA 7 & 8 are referred to and also the need to reduce CO2 emissions.

Climate Action Plan CAP 23 published in December 2022 by the Department of the Environment Climate Action and Communications

Chapter 15 focusing on Transport states “it will be guided by five key principles, which will be embedded across the measures identified. 1. Systems Innovation; 2. Just Transition; 3. Accelerated Implementation; 4. Communication and Citizen Engagement; 5. Enhanced Governance, particularly at local authority level.” The Climate Action Plan aims to reduce emissions by 2030 through sustainable transportation. Reference is made to the Louth Transport Acceleration Programme and the Climate Action Plan 2023, Annex of Actions.

Dunleer Town Centre First Masterplan & Ardee 2040 Masterplan

Ardee and Dunleer are key towns in Mid-Louth. Ardee is implementing its 2040 Masterplan. Dunleer is implementing the Government’s Town Centre First Policy. Dunleer’s plan prioritises reducing fossil fuel use and improving travel integration, with support from the initiatives of the Dunleer Town Team.

Border and West Regional Mentor service of the SEAI Sustainable Energy Community Network.

70% of work commutes are made by private car, and 31% of households own two or more vehicles. If one vehicle in each of the 16,000 households with multiple cars was replaced with an electric vehicle, it would result in a reduction of 272,935 tonnes of CO2, representing a 36% decrease.

150 people responded to a Survey Monkey on Transport and the results are outlined

Feedback from Key Organisations and Business

After publishing the document feedback was received from a range of groups. A summary of the feedback is provided:

- As fuel prices rise, commuters are facing significantly higher weekly expenses on car transport.
- Concerns about fuel security means workers will consider alternative modes of transportation.
- Travel within County Louth relies heavily on private cars.
- The current public transport system is inadequate for workers.
- Poor transport is an obstacle to attracting and retaining skilled employees.
- The Dublin-Belfast Economic Corridor is identified as a vital zone for economic expansion.
- Public transport terminals need to be close enough to main employment centres.
- GAA clubs across the county could help promote the necessary changes in travel behaviour.

Chief Executive Opinion on Issues raised:

The elected members of the Council formally adopted the Louth Climate Action Plan (LCAP) 2024 – 2029 on the 19th of February 2024. This is a five-year plan that sets out a pathway for Louth County to formally decarbonise. It deals with Climate Adaptation and Mitigation and presents a unified approach to climate action for the whole county.

The LCAP aims to support Ireland’s transition to Net Zero and achieve a climate-neutral economy by no later than 2050. This plan is a five-year plan to outline the actions which will be taken by the Council to support the national policy on Climate Change.

The plan will guide the Council in how it works across its services and functions and our partnerships with



government agencies, businesses, communities, public sector, and other stakeholders, to help deliver on national climate obligations at the local level. Part of the Plan will focus on public responsibility and highlight areas where the individual, groups can participate.

Climate action refers to a wide range of efforts taken by individuals, communities, organisations, and governments to address climate change and its impacts. It involves measures aimed at both mitigating the causes of climate change and adapting to the changes that are already occurring. Climate action encompasses various strategies and initiatives designed to reduce greenhouse gas emissions and build resilience in the face of a changing climate.

The Council welcomes its submission on reducing transport emission which broadly aligns with the Council's own Climate Action Plan. The LCAP includes both mitigation and adaptation responses to Climate change.

Mitigation efforts include transitioning to renewable energy sources, improving energy efficiency, adopting sustainable land-use practices, and promoting eco-friendly transportation methods. Climate action provides an opportunity to engage communities in decision-making processes, ensuring that the benefits and burdens of environmental policies are distributed equitably and that vulnerable populations are adequately supported.

Shifting towards a green economy can diversify economic sectors, reducing reliance on industries that contribute significantly to greenhouse gas emissions. These opportunities highlight the interconnectedness of climate action with various aspects of societal well-being, demonstrating that addressing climate change can bring about positive and transformative changes across multiple facets of life in County Louth.

Community groups can make a significant impact by:

- Supporting individuals to participate by reducing their carbon footprint, supporting clean energy initiatives, and advocating for policies that prioritise sustainability. The actions outlined in this plan contribute to overall local, regional, national and global efforts.
- Engaging people at the grassroots level and driving local action.
- Promoting public transportation, cycling, and carpooling can reduce carbon emissions, as can initiatives to improve pedestrian infrastructure
- Local Agriculture: Support local, sustainable agriculture and community gardens, reducing food transportation emissions.

Businesses can promote Sustainable Transportation:

- Promote carpooling, biking, walking, or the use of public transportation among employees. Offer incentives for those who choose eco-friendly commuting options.
- Telecommuting and Remote Work: Encourage telecommuting and remote work options to reduce commuting emissions and lower the need for office space.
- Advocacy and Partnerships: Join or support industry associations and initiatives focused on sustainability and climate action. Advocate for policies that support climate-friendly practices.

Key priorities include:

- Implement the LCAP including objectives for Dundalk decarbonisation zone.
- Develop and implement the Regional Electric Vehicle Charging Strategy 2024- 2029.

Chief Executive Recommendation:

To continue to engage with local communities to help deliver the climate action objectives as set out in the Louth Climate Action Plan.

Submission Ref. No:

LH-C144-DPIP-189

Submitted By:

Alison Dunne

Map showing land subject to Submission:

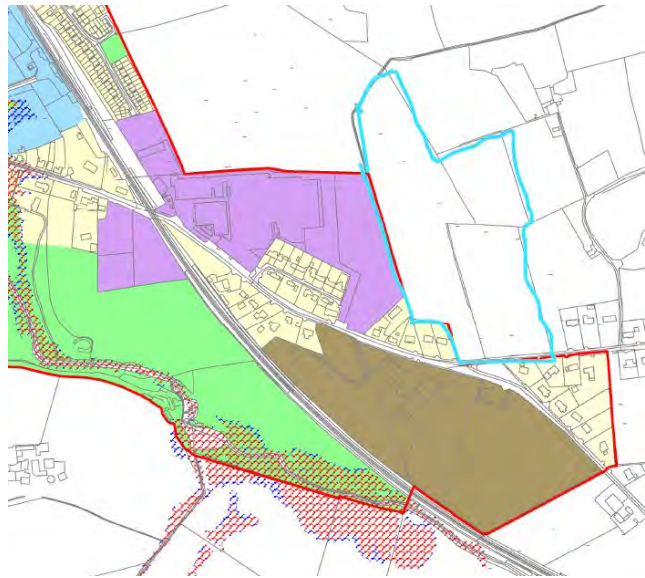


Figure 1: Map included as part of submission (lands in question outlined in blue).

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 22ha of land (outlined in Blue in Figure 1 above) from agriculture (currently zoned Rural Policy 2) to Residential.

The submission sets out a rationale for the rezoning request including situated across the road from a local school, new roundabout nearby which has been constructed to facilitate additional traffic, lands are in close proximity to Dunleer and associated amenities.

Chief Executive Opinion on Issues raised:

The lands subject to this submission are currently outside of and immediately adjacent to the settlement boundary of Dunleer as shown in Figure 1 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy. Any amendments to defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in black in Figure 2 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft



Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-191

Submitted By:

Electricity Supply Board (ESB)

Summary of Main Issues Raised:

Introduction

ESB supports the vision outlined in the Strategic Issues Paper and acknowledges the challenges in creating sustainable communities.

Overview of ESB Strategy

ESB’s overall strategy is outlined in terms of: Generation Transmission and Distribution, Networks, Roll out of EV infrastructure, Telecoms and Telecommunication Infrastructure.

Planning Policy and the Draft County Development Plan

ESB emphasises the need for secure, reliable and efficient energy infrastructure to enable housing, economic growth, and climate goals. Rising electricity demand, requires major grid expansion and resilience improvements. ESB welcomes the County Development Plan’s role in reducing GHG emissions and supports Louth’s ambition to achieve net zero by 2050.

Infrastructure is recognised as a key enabler of sustainable growth, and ESB advocates for strong CDP policies prioritising the delivery of energy infrastructure solutions to address current capacity constraints and accommodate the anticipated increase in demand.

Electricity Transmission & Distribution

Both the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) contain progressive policies promoting the development of energy infrastructure. ESB is proactively assessing network needs in Louth to plan reinforcements, upgrades and new infrastructure for residential, commercial, and industrial growth. ESB urges early coordination with Louth County Council to identify and zone sites for key infrastructure like 110/38kV substations.

The County Development Plan 2027–2033 must protect existing utilities and actively support the delivery of strategic energy infrastructure.

Transmission and Distribution

The NPF recognises that new energy systems and transmission grids will be necessary for a more distributed, renewables focussed system. Policy Objectives IU50-56 provide a strong foundation for supporting the delivery of energy projects, and it is recommended they are retained.

Section 10.10.1 affirms the commitment to developing a secure and reliable transmission network.

Furthermore, the plan advocates for the safeguarding of strategic route corridors, as well as the enhancement



of electricity networks to strengthen all-island energy infrastructure and interconnection capacity. It also recommended that IU79-81 are retained.

Medium and Low Voltage Distribution Network

ESB Networks reviewed the Medium and Low Voltage (MV/LV) network in County Louth to support decarbonisation and adoption of Low Carbon Technologies (heat pumps, solar PV, EV charging). Details are provided regarding Louth's substations and the need for upgrades. The Draft Plan should incorporate robust policy objectives supporting the reinforcement of the MV/LV network.

ESB requests close coordination with Louth County Council to identify and zone sites for key electricity infrastructure.

Generation & Renewables

The NPF sets regional renewable electricity capacity targets to accelerate onshore wind and solar development in line with the Climate Action Plan 2025. These targets will be integrated into Regional Spatial and Economic Strategies (RSES) and translated into county-level plans. ESB is committed to supporting government climate objectives by increasing renewable energy.

Louth has a clear path to play in the development of renewable energy, and the provision of such alternative energy resources should be considered and supported on suitable sites. The development of a Renewable Energy Strategy should be an important objective of the Draft Plan. A commitment in the existing LCDP 21 -2027 to produce a Renewable Energy Strategy was never enacted upon. Therefore, ESB strongly suggests the following policy:

“To produce a Renewable Energy Strategy for County Louth within one year of adoption of the revised Regional Spatial and Economic Strategy for the Eastern and Midlands Region, to include the Regional Renewable Energy Electricity Capacity Allocation for County Louth, during the lifetime of this Development Plan. This strategy shall have regard to ‘A Methodology for Local Authority Renewable Energy Strategies’, (SEAI) and shall be compliant with the requirements of SEA & Habitats Directive.”

Onshore Wind Energy

The Eastern and Midlands Region has been allocated 25% of Ireland's onshore wind capacity under the National Planning Framework, reflecting its key role in renewable energy development. Details are provided regarding renewable energy provision. The EU's RED III Directive aims to accelerate clean energy, reduce fossil fuel reliance, and streamline the permitting process.

ESB support the approach taken by Louth County Council in preparing Map 10.1 – *Areas suitable for Wind Development*, as part of the LCDP 2021-2027.

It is essential that the Louth County Development Plan 2027–2033 fully integrates and facilitates the allocation of renewable energy generation capacity as set forth in the Regional Renewable Energy Strategy developed by the Eastern & Midlands Regional Assembly.

Offshore Wind & Marine Renewables

ESB positions offshore wind and marine renewables are key drivers in Ireland's transition to net zero. County Louth is well suited for significant offshore wind development. Policy Objectives IU 61 and IU 62 should be retained. Alongside the inclusion of policies which support offshore wind generation projects and associated onshore infrastructure.

Solar

Details are provided regarding Louth's suitability for Photovoltaic (PV) systems. ESB support the continuation of existing Policy Objectives IU 65 and IU 66. However, to suitably facilitate the efficient development of Solar



Farms in County Louth, a map, similar to Map 10.1 – *Areas suitable for Wind Development*, for Solar Developments is required

Therefore, the Planning Authority should grant permissions for longer than the standard five-year period. ESB also request that permissions are granted with a lifetime up to a maximum of 40 years.

Energy Storage Systems

Details are provided regarding the merits of Energy Storage Systems (ESS),

ESB plan to develop a pipeline of large-scale battery projects, as well as additional renewable enabling technologies.

ESB would welcome the inclusion of specific policies supporting the crucial role of Energy Storage Systems in grid stability. ESB propose that the wording below be incorporated into the new CDP to promote the delivery of Storage Solutions-

“Energy Storage Systems such as batteries, green hydrogen storage, along with grid stability services, are some of the technologies being explored that will be essential to smoothing out the natural variability that occurs in renewable energy sources and to provide electricity at times of peak demand”.

Hybrid Renewables and Repowering/Life Extensions

By developing hybrid renewables plant consisting of wind, solar and battery exporting from a common point of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved on. ESB support the continuation of Policy Objective IU 63.

As recognised in the Draft CDP, County Louth is exceptionally well served by the grid with cross border 275kV lines, existing 220kV transmission lines providing a high-capacity path for power to the east of Ireland. For these reasons, there is a strong argument for giving hybrid renewables and repowering/life extensions of plant favourable consideration in suitable locations in County Louth.

Demand Management

Considering the potential of generation from offshore windfarms proposed for Louth and the North South Interconnector bringing power from North Ireland via Louth 220kV Station, there may be an excess of electricity supply relative to demand in County Louth. Examples of demand-side management opportunities for Louth are provided.

Telecommunications

The provision of high-quality telecommunications infrastructure is a key element to attracting investment and sustaining economic growth in Louth.

Sustainable Transport & Electric Vehicles

ESB welcome all initiatives to increase the rate of provision of charging points for electric cars, details are provided regarding same and electric vehicle target are outlined. It is stated that building the EV charging network to support the growth of EVs is required.

In this regard, ESB acknowledges the existing provisions within the current LCDP 2021-2027, in sections 7.6.2 ‘*Electric Vehicles*’, and 13.16.9 ‘*Charging Points for Electric Vehicles*’ and request that these are updated to meet the *Climate Action Plan 2025 targets*. Specifically, ESB recommends strengthening the electric vehicle (EV) parking policy within the CDP to better facilitate the adoption and expansion of EV infrastructure in line with national and EU directives.



Conclusion

ESB request the Draft County Development Plan includes clear policies in relation to:

- Protect Strategic Energy Infrastructure.
- Enable Flexible and Evidence-Based Planning.
- Facilitate Renewable Energy Development.
- Commit to a County Renewable Energy Strategy.
- Support Long-Term Solar PV Deployment.
- Promote Telecommunications Infrastructure.
- Advance Sustainable Transport and EV Infrastructure.
- Support Grid Flexibility, Hybrid Renewables and Demand Management.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of the Council's role in facilitating a smooth transition from fossil fuels to renewable energy formats to comply with European, national, regional and local legislation, policies and targets.

The Chief Executive notes the comments from ESB regarding its suitability to provide a range of renewable energy generating sources both on land and sea. The Draft Plan will have cognisance to this, by implementing a wide range of policy objectives to ensure a smooth transition in line with Statutory obligations. A review of existing policies will occur to assess their effectiveness, while taking note of a wide range of other factors including community impact, rural impact, alongside a range of other environmental considerations.

The above comments are noted, including the recommendations to be included within the Draft Plan.

Chief Executive Recommendation:

Review existing energy and telecommunication policies to assess their effectiveness in meeting current statutory obligations, while having regard of a wide range of other factors including community impact, rural impact, alongside a range of other environmental considerations. Use such information to develop new policy objectives, narrative, maps, and land zonings which seek to include the above recommendations which are deemed appropriate.

Submission Ref. No:

LH-C144-DPIP-192

Submitted By:

Finn Design Partnership on behalf of Seamus Rogers

Map showing land subject to Submission:

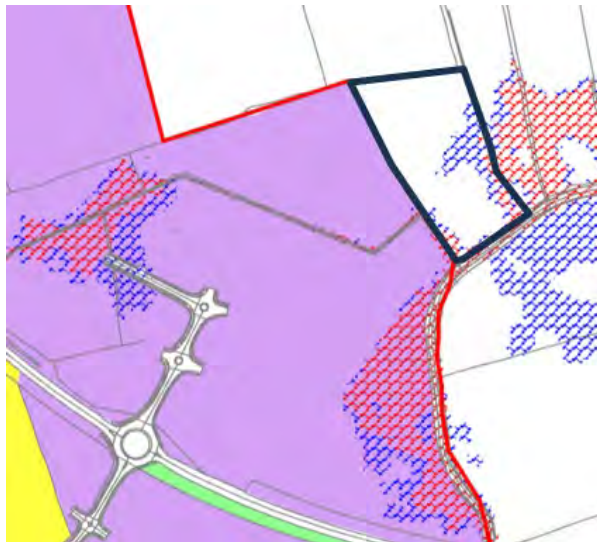


Figure 1: Extract from Ardee Zoning and Flood map in the current Louth County Development Plan 2021-2027 to illustrate the lands subject of this submission (lands in question outlined in black).

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 7 acres (2.8ha) of land (outlined in black in Figure 1 above) at Riverstown, Ardee. The lands are currently zoned Rural Policy Zone 2.

The submission sets out the following rationale for the rezoning request:

- The lands form part of a single field (16.7acre) of which 9.7acres are currently zoned E1 General Employment.
- The rezoning of the lands would follow the existing natural and physical boundaries of the land.
- Access to the remaining area of unzoned land is limited.
- Current agricultural zoning limits the potential contribution to the local economy, and the rezoning would provide further opportunities to create jobs and enhance the economic vitality of the area.
- The lands can be served by existing infrastructure and services.

Chief Executive Opinion on Issues raised:

The land subject of this submission is located to the north of the N33 and are currently outside of and immediately adjacent to the settlement boundary of Ardee as shown in Figure 1 above.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet anticipated growth including lands required for economic development. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan.



The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in black in Figure 1 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-193

Submitted By:

Brady Hughes Consulting on behalf of Lorrac Developments

Summary of Main Issues Raised:



Figure 1: Aerial image included as part of the submission identifying the lands in question.



Figure 2: Illustrating the settlement boundary of Philipstown as per the Louth County Development Plan 2021-2027. The settlement boundary is outlined in red and the lands subject of the submission are identified with a blue star for ease of reference.

Summary of Main Issues Raised:

The submission is made on behalf of Lorrac Developments, and sets out the following points for consideration when preparing the new Plan:

Under the S.28 Guidelines, Louth County Council are required to plan for 1,677 new homes per annum to 2034, significantly above the previous target as well as a required headroom of 50%. Policy Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Small Towns, Villages and the Rural Area:

In the Louth County Development Plan 2021-2027 the combined population of the designated Small Towns and Villages, Rural Nodes and the Rural Area equated to 32% of the population of the county. The entire housing allocation (within the current CDP) for County Louth from 2021-2027 is 6,524, with the Small Towns and Villages allocated 719 (11%) of this figure. Should Louth County Council apply the proportional allocation to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom (required to address potential non-activation of lands), there will be a target delivery of 276 new homes per annum in the small towns and villages, rural nodes and the rural area for the next 10 years.

If growth in Louth is to continue in accordance with National and Regional planning policies, it will be necessary to identify additional lands to meet the housing targets for the county within the NPF. It would be more appropriate to locate additional houses in Small Towns and Village, and/pr Rural Nodes, rather than isolated one-off houses in the open countryside.

Suggested Response

The submission requests that the planning authority include for increased housing supply across all settlement categories. Many rural nodes in the county have the capacity to absorb additional housing in line with the core strategy.

Philipstown enjoys the benefit of a primary school, GAA Club with excellent facilities and a significant employer (Philipstown Engineering). The settlement has public water mains network but does not have a wastewater



treatment plant. Settlements such as Philipstown have a role to play in respect to population growth and providing an alternative to one-off houses dispersed in the countryside.

The Minister's direction and the Plan review present an opportunity for the Council to support the development of serviced sites schemes in Small Towns & Villages and Rural Nodes.

The submission further requests that the planning authority consider extending the settlement boundaries of rural nodes such as Philipstown along with the small towns and villages and to introduce appropriate policy objective supporting additional housing delivery in rural settlements like these.

We would encourage a proactive approach with respect to identification of suitable lands in settlements of all sizes with a view to aligning local delivery mechanisms with national objectives thus ensuring a sustainable, serviced, and plan-led housing strategy for the county at all settlement levels.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of Rural Nodes such as Philipstown within the overall settlement hierarchy for the county.

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether or not additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to their lands if necessary.

As noted above, the Draft Plan will be consistent with national and regional planning policy, and the Chief Executive recognises the importance of National Planning Objective 18(b) of the NPF which seeks to reverse rural decline by creating serviced sites in small towns and villages and rural nodes for self-built homes. The Draft Plan will support and facilitate rural regeneration through the provision of policy objectives in relation to same.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional policy and guidance.

To incorporate the housing allocation for Louth as provided for in the 'NPF Implementation Housing Growth Requirement Guidelines' into the Core Strategy of the Draft Plan.



To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

To include relevant policy objective(s) to support and facilitate rural regeneration such as identifying opportunities for serviced sites and to support the delivery of additional housing within settlements.

Submission Ref. No:

LH-C144-DPIP-194

Submitted By:

Hermione Duffy

Summary of Main Issues Raised:

The submission relates to the Haggardstown and Blackrock village and is set out under the following headings:

Population Growth: Alleviating the pressure points in the area that have occurred due to the rapid growth in the parish should be a priority.

The type of housing provided should reflect the demographic, environment and demand e.g. families, downsizing families, older people, retirement. Low-density housing as opposed to high-density housing.

Concerns set out in relation to safety of cyclists along the R172 and also the dangerous junction along the Dublin Road at Sexton's.

Community & Facilities:

Community facilities in Haggardstown and Blackrock are under severe pressure. Raynoldstown village needs to have its own community centre/ school/ commercial units constructed as soon as possible. The infrastructure to service these facilities requires to be put in place to allow these essential facilities to develop.

Transport and Connectivity:

The community is car centric and predominantly travel by car. Improving safety for cyclists along the R172 should be considered in the new Plan. Provision of a train station in Haggardstown could also be considered to avoid commuters having to navigate into the town at peak times.

Environment:

A new Greenway from soldiers point to the south would be a good long term amenity project. Submission is aware of coastal works that are proposed as flood defences to Dundalk.

There needs to be more support for protecting the built heritage on the villages and towns and access for funding should be made easier.

Climate Action and Sustainability:

Concerns raised about the WWTP at Cockle hill and the possible pollution of Blackrock beach. Testing of water should commence asap.

Conclusion: There is a need for joined up thinking between all the infrastructure providers e.g. Uisce Éireann, Louth County Council and they should allow consultations with the local community.

Chief Executive Opinion on Issues raised:

The Dundalk Local Area Plan was adopted in March 2025 and was prepared under separate legislation to the County Development Plan. Policy Objective MOV 3 contained in the Dundalk LAP 2025 – 2031 seeks to implement the Dundalk Local transport Plan and its projects as set out in Table 8.2 and 8.3 of this Plan.



The Council acknowledge that the Haggardstown, Blackrock area has experienced considerable population growth and residential construction is ongoing in the area which will result in a further increase in the population. The creation of a sustainable community involves the provision of requisite services, amenities, and facilities to meet the needs of the local population.

It is recognised that at present there is a deficiency in local services and social and community infrastructure to serve the new residential population in the Haggardstown area. The Dundalk LAP 2025 zoned an area for Community facilities to allow for neighbourhood facilities to address the community facilities deficit that existed in this location.

Raynoldstown Village:

The continued build out of these lands is supported with local services, community facilities and open spaces to be provided in tandem with residential accommodation. It is noted however that the Raynoldstown Village area is currently lacking in a community building to meet the needs of the residential population.

The Dundalk LAP 2025 has included relevant policies:

- Requirement that a neighbourhood centre with associated community uses has commenced construction prior to no more than 1,000 units in Raynoldstown Village being occupied. Planning permission shall also be granted for a community building. This building shall be designed to ensure flexibility as to its future use.
- support sustainable neighbourhoods and residential developments in Dundalk that facilitate the provision of the required neighbourhood infrastructure such as schools, recreational amenities, community facilities, healthcare and childcare facilities and a suitable mix of housing at an appropriate density in accordance with the 'Sustainable Residential Development and Compact Settlements Guidelines' (DHLGH, 2024).
- To support the development of new education facilities and the improvement/expansion of existing facilities for all including those with special education needs. Where feasible, multi-educational campuses will be encouraged.
- To support and encourage the provision of community and social infrastructure facilities to serve existing and future residents, and to encourage shared/dual use of existing and future facilities.

The Draft Plan will look at the development of the Louth Coastal Way Dundalk to Blackrock Greenway which is currently a policy objective of the Dundalk Local Area Plan 2025 – 2031. This Greenway will provide a traffic free movement corridor enabling the protection and enhancement of biodiversity, as well as providing a local and regional tourism asset. Consideration will be given to the development of the Louth Coastal Greenway in conjunction with the Dundalk Blackrock flood alleviation scheme.

The Chief Executive notes the environmental concerns surrounding Blackrock beach. The operation of the Wastewater Treatment Plants is the responsibility of Uisce Éireann the Council. It is noted that Uisce Éireann are investing in infrastructure to address issues of non-compliance operational issues and increase capacity in the wastewater infrastructure. The Draft Plan will support the protection and enhancement of designated sites including Dundalk Bay and will include policy objectives relating to same.

Chief Executive Recommendation:

To liaise and work in partnership with Uisce Éireann in identifying, prioritising and progressing the implementation of water and wastewater projects including the Blackrock WWTP and include policy objectives in the Draft Plan relating to same.

To continue to support the provision of social community infrastructure and promote safe and sustainable neighbourhoods throughout the Plan area.

To support the implementation of the Dundalk Local Transport Plan and the projects identified therein.

To support the implantation of the Louth Climate Action Plan 2024-2029.

To liaise with the Department of Education in relation to the requirement for additional schools in Dundalk, including Raynoldstown Village.

Submission Ref. No:

LH-C144-DPIP-195

Submitted By:

Finn Design Partnership on behalf of Seamus, John & Shane Rogers

Map showing land subject to Submission:

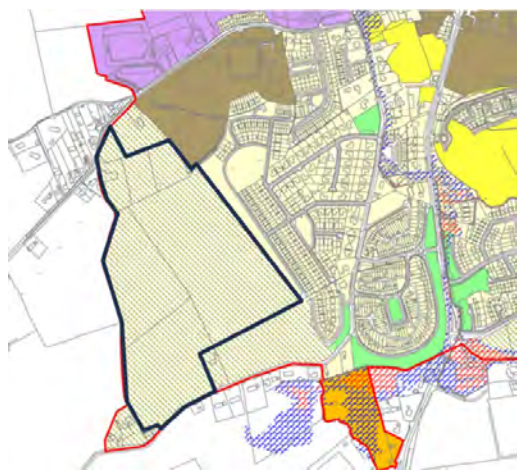


Figure 1: Extract from Ardee Zoning and Flood map in the current LCDP 2021-2027 to illustrate the lands subject of this submission (lands in question outlined in black – Not to scale).

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 48 acres (19.4ha) outlined in Blue in Figure 1 above, from L1 Strategic Reserve to A2 New Residential Phase 1.

The submission sets out the following rationale for the rezoning request:

- The lands form part of a significant land bank that adjoins the Rockfield Residential Estate.
- The NPF suggests that more land needs to be zoned for housing.
- There is a deficit of land in Ardee to meet the housing requirements, both in terms of zoned land and the amount of land available for development.
- The land offers the opportunity to follow a sequential approach that complements the established neighbourhoods.
- The land is fully serviced, easily accessible and available for immediate development.

Chief Executive Opinion on Issues raised:

The purpose of the pre-Draft consultation is to identify strategic issues that will inform the policy objectives and



the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on the requested rezoning of the lands outlined in black in Figure 2 at this stage of the plan review process.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-196

Submitted By:

National Transport Authority (NTA)

Summary of Main Issues Raised:

The Louth County Development Plan should include land use policies/objectives with the following guiding principles:

- Urban generated development, prioritising development in/contiguous with existing urban areas over less accessible locations.
- Sequential residential development in urban areas, to prioritise lands most accessible by walking, cycling and public transport and Brownfield sites.
- Offices and retail uses should be in central locations of urban areas.
- Central locations in towns should be permeable for walking, cycling and public transport and hence ensure delivery of town centres that are attractive, vibrant, safe to work live and shop.
- Maximise population living close to services etc to maximise walking, cycling and public transport.
- New developments should be permeable for walking and cycling and provide for filtered permeability while restricting through trips by private car and established areas should be retrospectively fitted to improve walking and cycling.
- Density and location of employment development should maximise walking and cycling.
- Trip destinations should be located to maximise potential to be accessed by walking, cycling and public transport.
- Maintain strategic transport function of roads as per national policy.
- Non-residential development should be subject to maximum parking standards.
- Where the highest density of development occurs, car parking on an area wide basis should be capped.
- Condition travel plans in major employment and school developments and carry out as per National Transport Authority guidance.

Movement at Inter-Settlement level

The NTA submission recommends that an assessment of inter-settlement travel patterns across the county and to key settlements in neighbouring counties including Dublin city is undertaken, to better understand travel patterns and associated transport infrastructure and services requirements.

Movement at Settlement Level – Local Transport Plans (LTP)



NTA recommends that the Drogheda Local Transport Plan is finalised in 2026 and in line with the suite of Area Based Transport Assessment documents.

It is intended that LTPs:

- Maximise the opportunities for the integration of land use and transport planning.
- Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context.
- Plan for the efficient movement of people, goods and services within, to and from the Plan area.
- Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed based on existing transport assets; and
- Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.

Planning for Bus Service Provision

The County Development Plan should recognise the importance of bus service to the community and should facilitate their improvement through supportive land use policies and design.

The County Development Plan should include a policy to support and develop public transport routes throughout the County.

It should also take cognisance of the opportunities presented by investment currently being committed to the improvement of bus infrastructure and services. Policy support for the Connecting Ireland programme is also recommended.

NTA requests the Council includes a policy to ensure that public transport infrastructure is considered as part of any significant residential or commercial development.

Provision of Public Transport Services in Rural Areas

The NTA submission requests that the Council acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns.

The NTA will develop and expand the Local Link Rural Transport Programme in the following manner:

- Seek further integration with other public transport services, including HSE and school transport.
- Ensure fully accessible vehicles operate on all services.
- Enhance the customer experience.
- Increase patronage among children and young people; and
- Encourage innovation in the service.

Strategic Road Network

The submission reinforces the following from the National Planning Framework (NPF):

National Policy Objective 74 seeks to “Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes”.

National Strategic Outcome 2 of the NPF indicates the need for “Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements”.

The NTA recommends that development objectives should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012).

Parking Standards

Car Parking: The NTA recommends that car parking provision for non-residential land uses should be stated as



maximum standards rather than minimum requirements. In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.

Cycle Parking: Submission advises that cycle parking should be appropriately designed into the urban realm and new developments to ensure that adequate facilities are provided. The submission advises that the Development Plan should include specific policies on cycle parking in the urban realm and in private developments.

Accessibility

The submission notes that the NPF recognises that social inclusion can be improved in the transport sector through, among other things, universal design. The NTA submission recommends that enabling universal access and facilitating and promoting universal design should be a key consideration in the County Development Plan

National Transport Authority Guidance Documents

The NTA submission recommends that the preparation of the Development Plan is informed by the following NTA guidance, available on the NTA website:

- The Cycle Design Manual.
- Permeability Best Practice Guide.
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities.
- Workplace Travel Plans: A Guide for Implementers.
- Planning Cities and Towns for Successful Bus Services.
- Toolkit for School Travel; and
- Guidance Note and Pilot Methodology on Area Based Transport Assessment (NTA/TII).

Development Plan Indicators – Mode Share

Submission recommends that the County Development Plan includes sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators.

Chief Executive Opinion on Issues raised:

As part of the development plan review process a Local Transport Plan (LTP) is presently being prepared for Drogheda. In addition, a LTP was prepared as part of the preparation of 2025-2031 Local Area Plan. The outputs of the LTP include both a walking and cycling strategy which will seek to create a comprehensive high-quality pedestrian and cycle network in the town, in order to initiate a permanent shift away from private car use. This will assist in greatly improving sustainable movement between residential areas and key destinations including schools and should consequently alleviate some concerns regarding parking and congestion.

In recognition of the need to continue to improve rural transport in the County the Council will include policies supporting improvements to the Rural Transport Programme which is co-ordinated by the National Transport Authority.

The Council will also consider the Guiding Principles for the Integration of Land Use and Transport in the Regional Spatial and Economic Strategy in respect to non-residential developments.

Policies relating to national roads and motorways will have regard to the Spatial Planning and National Road Guidelines. The Council has finalised the Dundalk Local Transport Plan (LTP) and is progressing with the LTP for Drogheda. Further engagement will be held with the NTA and TII to ensure an integrated approach to transport planning is in place. The Council will formulate transport policies in conjunction with the NTA to develop public



transport routes throughout the county and to ensure that new residential neighbourhoods have adequate public transport facilities available within a 15-minute walk of these homes.

Chief Executive Recommendation:

To include policies that support improvements in connectivity and permeability between places and increased opportunities for more sustainable forms of transport including walking, cycling, and public transport throughout the County.

To promote the creation of more compact settlements through the consolidation of development in established urban areas and the regeneration of under-utilised Infill and Brownfield lands.

To include policies to support the implementation of Local Transport Plans for Dundalk and Drogheda.

To seek by condition Transport Mobility Plans for large companies seeking extensions/new developments who employ large amount of people within the County.

Submission Ref. No:

LH-C144-DPIP-198

Submitted By:

McCutcheon Halley Chartered Planning Consultants
on behalf of Greenore Port Unlimited

Summary of Main Issues Raised:

Background to Greenore Port

Background to Greenore Port provided.

Issues Raised by submission

(i) Land Use Zoning

Zoning at the port should be flexible to take account of the port operations and its strategic importance to the local economy. There is a requirement to have a port specific objective included that provides a degree of clarity for potential investors, regulatory bodies and the public and that provides certainty that allows for any future expansion and operation use of the Port.

Greenore is Ireland’s only privately owned commercial port, and that its importance to the local and regional economy is such that it justifies having a site-specific zoning.

(ii) Renewable Energy

Greenore Port is well positioned to support Ireland’s transition to a low-carbon economy and to serve as a critical node for both offshore and onshore renewable energy development. It has the capacity to support operations & maintenance, and logistics for onshore renewable energy projects such as wind turbines and solar PV.

The submission requests that the Draft plan include specific objectives which facilitate port-led investment in renewable energy infrastructure. This request aligns with specific national and regional policy frameworks

Facilitating Greenore Port’s expansion and renewable-energy infrastructure will directly support national energy security, the decarbonisation of maritime and energy logistics, and Ireland’s 2030 and 2050 climate targets, while also promoting regional economic growth, employment, and investment opportunities.



(iii) Economic Development and Employment

Greenore Port is a hub for diverse bulk cargoes. This cargo diversity underpins regional supply chains and employment and provides the Port with a strong operational base for future growth and diversification. This submission requests that the Draft Plan include objectives supporting port-centric employment lands, logistics, warehousing, and ORE-related enterprises, and that it explicitly facilitates the Port's future growth and expansion.

Greenore has obtained a Central Statistics Office (CSO) main-port destination status in (2025). This designation recognises Greenore as a strategic economic asset for County Louth and the wider Eastern and Midlands region. Greenore Port is currently looking into developing a LoLo and a RoRo facility.

The Draft Plan should adopt a forward-looking approach that:

- Recognises Greenore Port as a strategic maritime and logistics hub.
- Supports the principle of future diversification of port operations, including emerging cargo types.
- Facilitates port-centric employment and enterprise growth.
- Provides sufficient spatial and policy flexibility to allow the Port to respond to national supply chain needs and commercial opportunities as they arise.

Heritage and Environmental Sensitivity

Greenore Port recognises the historic and architectural significance of Greenore village and is committed to supporting heritage protection measures.

The submission requests that the development plan include a performance-based policy approach that allows for functional port expansion where heritage impacts are minimised and mitigated. Such an approach would enable the Port to modernise and grow to meet national and regional economic, logistics, and offshore renewable energy objectives, while respecting and enhancing the village's historic character.

Flood Risk and Climate Resilience

Greenore Port acknowledges the Office of Public Works (OPW) Carlingford & Greenore Flood Relief Scheme and supports its implementation. Greenore Port seeks to engage with OPW, Louth County Council to ensure flood defence design are compatible with current operations and planned expansion, protecting both port functionality and public safety.

Chief Executive Opinion on Issues raised:

Policy Context

Project Ireland 2040: This is the government's long-term overarching strategy to make Ireland a better country for its entire people. It is predicated on the proper alignment of investment priorities and capital expenditure with a carefully considered and defined strategy. In this Project, the National Marine Planning Framework (MNPF) is a parallel document to the National Planning Framework which sets out spatial targets for Ireland's Marine Area.

National Planning Framework, 2018-2040

This document, under Section 1.3, indicates that high-quality international connectivity is crucial for overall international competitiveness and addressing opportunities and challenges from Brexit. In relation to ports, it highlights investment in them through the National Ports Policy.



National Policy Objective 39 advocates the support of the sustainable growth and development of the maritime economy. Ireland's port and shipping services play an important role as enablers of economic growth and that they are critical infrastructure for international trade with over 90% of international trade moving by sea. Ports also serve as logistic and distribution hubs. It states that: "port infrastructure involves development on both land and the marine area (foreshore) and often in proximity to areas of environmental importance and protection, and diverse eco-systems". Ireland depends on the quality and efficiency of our ports"; and "to maintain economic growth, we must be capable of delivering additional port capacity in a timely and predictable manner".

National Maritime Planning Framework (NMPF) 2021

The NMPF is intended as the marine equivalent to the National Planning Framework to enable the Government to set a clear direction for managing our seas, clarify objectives and priorities and direct decision makers, users and stakeholders towards strategic, plan-led, and efficient use of our marine resources.

Future Framework for Offshore Renewable Energy Policy Statement 2024

Includes 29 key actions to develop Ireland's long-term, plan-led approach to offshore wind. The guiding principles of the policy include the protection of maritime environment and biodiversity, affordability of energy, an equitable return to communities, alignment of policy and infrastructure, inspiring confidence for investment, emphasising technological innovation, illuminating opportunities for return to the state and prioritising stakeholder and public engagement.

Policy Statement on the facilitation of Offshore Renewable Energy by Commercial Ports in Ireland 2021

Key recommendation out of the assessment was that multiple port facilities in Ireland will be required for ORE (offshore Renewable Energy). The policy statement published to encourage all ports to actively engage with potential development opportunities. Louth County, with its considerable coastal extent presents significant opportunities for economic development in servicing offshore wind developments.

The Climate Action Plan 2024 – 2029 through Action Number SRM 7 will "support local level renewable energy and micro generation projects within county Louth and cooperate with neighbouring regions where opportunities are identified.

The existing County Development Plan (Chapter 5 of the plan refers to Economy and Employment) and refers to Marine Opportunities including Ports.

Policy Objective EE 25 is to align the policy objectives of the Plan with the Maritime Spatial Plan, while policy objective EE 26 supports the growth of the maritime economy, the balancing of competing demands for available space and the encouragement of co-location and co-existence of activities and infrastructure.

Policy Objective EE 27 recognises that the port facilities at Drogheda, Greenore, Dundalk, and Clogherhead are an important economic resource and seeks to support any improvements or expansion to these Port facilities and the consolidation of Dundalk Port, subject to the preparation of a Master Plan and appropriate environmental considerations.

Louth County Council have granted planning permission to Greenore Port Unlimited Company in 2024 for a development comprising of Operation and Maintenance (O&M) Facilities which will serve as the support base for future offshore wind arrays in the Irish Sea.

Land Use Zoning

The Draft Plan will recognise the importance of Greenore Port and its location within a Rural Node settlement. Rural nodes are characterised by clusters of residential properties with limited local services and facilities. The boundary of Greenore Rural Node includes Greenore Port is included within the development envelope of



Greenore.

The requirement for land zonings be assigned for rural nodes is noted however Louth County Council have been able to allow appropriate port related developments within Greenore Port over the years without the need for site specific assigned land use zonings. The Council will review this policy context for Ports under the Economic and employment section of the Draft Plan given the CSO main port status designation awarded to Greenore Port for handling 1 million tonne of goods for the last three consecutive years.

Heritage and Environmental Sensitivity

Greenore Port has recognised that any development proposed requires to sensitively designed and planned to ensure that Greenore's natural and built heritage is protected. Any proposals will be required to submit an architectural assessment to determine any impacts that may arise due to the development and highlight any potential effects this might have on the site and surrounding area, which includes an Architectural Conservation Area (ACA) and numerous protected structures.

Greenore has substantial architectural heritage in the vicinity of the port, and any development proposal must be designed to minimise visual impacts on the nearby historic village of Greenore. The continued development of port activities at Greenore requires new and improved facilities over time, however these proposals require careful management to ensure that the industrial heritage value of Greenore is maintained.

Flood Risk and Climate Resilience

The Louth Climate Action Plan (LCAP) indicates that coastal flooding is projected to see an increase in sea levels of 0.24 meters by 2050, so coastal flooding is set to be magnified and become more frequent. This together with coastal erosion will increase coastal flooding with rising sea levels.

Action number NEGI 11 in the LCAP sees to progress Flood defences schemes Dundalk-Ardee Flood relief and Drogheda & Baltray flood relief scheme whilst having appropriate regard to environmental protection requirements associated with flood resilience development.

The Carlingford - Greenore flood defence scheme is not noted in the LCAP 2024 – 2029 but is a development objective of the current Louth County Development plan. Louth County Council will engage with OPW to reach agreement upon a timeline for its construction. The submission seeks that all flood defence schemes should be compatible with future operations and planned expansions of the port.

Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this rezoning proposal at this stage.

Chief Executive Recommendation:

To recognise the importance of Greenore Port in facilitating and enabling economic growth in the County and wider region by the international connectivity it provides.

To review the current designation of Greenore Port in the Rural Node of Greenore and whether a land use zoning for the Port would be required.

To include a narrative in the Draft Plan acknowledging the architectural and built heritage in the vicinity of Greenore Port and the need for any development at the Port to be sensitive to its surrounding environment.



Submission Ref. No:

LH-C144-DPIP-205

Submitted By:

McGill Planning Ltd on behalf of Cairn Homes Properties Ltd

Summary of Main Issues Raised:

Introduction

The submission provides a summary of operations of Cairn Homes and states that they forward to collaborating with Louth County Council under the new Development Plan to help achieve the County's vision and deliver sustainable communities.

Submission

County Louth has experienced significant growth, with population increasing by 8% and housing stock by 7%. Dundalk and Drogheda have similarly grown by 10.5% (43,112) and 7.8% (40,956) respectively and together represent over 60% of the County's population.

National and regional policy frameworks, including the National Planning Framework the Regional Spatial and Economic Strategy (RSES), position Drogheda and Dundalk as Regional Growth Centres strategically located along the Dublin-Belfast Economic Corridor. They are targeted to reach 50,000 population each by 2031, achieving "city scale" through compact, sustainable development and strengthened urban structures to attract investment and act as regional economic drivers.

Core Strategy

The Pre-Draft Strategic Issues Paper emphasises the Core Strategy as central to Louth's spatial development, aligning local objectives with national and regional policy. Its primary focus is on residential development, ensuring sufficient zoned and serviced land to meet housing needs. In July 2025, the Department of Housing, Local Government and Heritage (DHLGH) issued new guidelines under Section 28 of the Planning and Development Act 2000, setting increased housing growth targets for local authorities.

For Louth, housing targets have risen by at least 22%, with the Core Strategy expected to deliver 1,677 new homes annually up to 2034. Furthermore, the Guidelines require a 50% headroom which further increases this figure.

Over the next decade, Louth must deliver 25,000+ new homes, with Drogheda and Dundalk providing the majority in line with national and regional policy. The Core Strategy for the next Development Plan must incorporate this 50% increase and ensure sufficient, unimpeded residential zoned land in both towns.

Currently, Dundalk and Drogheda account for 75% of housing allocation (4,894 of 6,524 units in the 2021–2027 Plan). Under new NPF targets, each town will need to deliver 625–938 units annually, totalling up to 9,377 units each by 2034. At an average density of 25 units per hectare, this requires zoning 250–375 hectares (514–773 acres) per town to meet future housing needs.

Dundalk

Currently the Dundalk Local Area Plan 2025-2031 has zoned a total of 278ha of land for housing delivery. While current zoned land appears broadly aligned with revised NPF housing targets, it does not account for the additional 50% provision required under new guidelines.

Of the 278ha zoned, 28% (78.8 ha) is zoned A3 New Residential Phase 2, which faces significant development restrictions under Policy DS7, requiring most A2 lands to be developed first.

Given that the 2025 Dundalk LAP predates the NPF First Revision and Implementation Guidelines, it must be updated alongside the new Core Strategy. Crucially, the LAP Variation should:



- Remove phasing/tiering restrictions on A2 and A3 lands, as these are serviced/serviceable and capable of development during the lifetime of the Plan.
- Facilitate additional residential zoning of Strategic Reserve lands to achieve the required 375ha for housing delivery under revised targets.

Drogheda

It is understood that a Draft of the Joint Local Area Plan for Drogheda (prepared by Louth County Council and Meath County Council) will be published in the coming months with the new LAP to replace the previous Drogheda Borough Council Development Plan 2011-2017.

According to the Core Strategy of the Louth County Development Plan 2021-27 there are currently c.304.8 ha of zoned residential land in the town. 270 ha of this is zoned 'New Residential Phase 1' with the remainder comprising brownfield and infill lands (34.8 ha). There are no Phase 2 zoned lands.

As with Dundalk, it will be critical that all of these residential zoned lands are carried forward into the new LAP and without any new phasing/tiering restrictions applied. Furthermore, additional lands will need to be zoned for New Residential in order to provide the necessary quantum to meet the new NPF targets inclusive of the 50% 'additional provision'.

Conclusion

Cairn Homes plans significant investment in Louth to deliver sustainable communities in Drogheda and Dundalk, supporting the Government's Housing Plan target of 300,000 units by 2030. The State is committing €28.2 billion for infrastructure, including water, wastewater, and energy, to enable housing delivery.

The Planning Authority must ensure a critical mass of serviced or serviceable zoned land is available during the period of the next Development Plan. However, given the long timeline for adopting a new County Development Plan (2027), Louth County Council must act now by:

- Review and vary the current Core Strategy to incorporate new housing targets for the remaining two years of the current plan.
- Zone additional lands through a Variation to the Dundalk LAP and the forthcoming Drogheda Joint LAP.

Chief Executive Opinion on Issues raised:

The Section 28 Guidelines – NPF Implementation: Housing Growth Requirements were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is

advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

The comments in relation to Dundalk and Drogheda have been noted.

Chief Executive Recommendation:

Incorporate the housing allocation for Louth as provided for in the ‘NPF Implementation: Housing Growth Requirement Guidelines’ into the Core Strategy of the Draft Plan.

Carry out an analysis of land use zonings in each settlement to identify the capacity of zoned lands for residential development to meet the allocation provided for in each settlement in the Core Strategy of the Draft Plan.

Submission Ref. No:

LH-C144-DPIP-208

Submitted By:

Brady Hughes Consulting on behalf of Olan McNeece

Summary of Main Issues Raised:



Figure 1: Aerial image included as part of the submission identifying the lands in question.



Figure 2: Aerial image illustrating the submission lands (outlined in yellow) and the settlement boundary of Baltray as per the current CDP 2021-2027 (outlined in red).



Figure 3: Site layout of permission referenced within submission (Reg Ref 07/1398 – permission for 1no. dwelling and outline for 2no. dwellings. Only 1no. dwelling constructed).

Summary of Main Issues Raised:

The submission is made on behalf of Olan McNeece, a developer with interests in lands adjacent to Baltray, and sets out the following points for consideration when preparing the new Development Plan for County Louth:

Background

The lands, shown in Figure 1 above, were partially developed by the submitter. The lands were included within the settlement boundary of Termonfeckin-Baltray Local Area Plan 2003 and permission was granted for 1no. dwelling and outline permission for 2no. dwellings (site layout plan shown in Figure 3 above). Only one dwelling was constructed due to the global financial crisis at the end of 2007 and the lands were then de-zoned.

The lands and surrounding field represent and infill opportunity within an existing residential cluster that is fully serviced.

National Planning Context

Section 5.1 of the Revised NPF sets out why rural places matter and the regeneration, repopulation and development of rural towns and villages is a key focus of the NPF.

The NPF Implementation: Housing Growth Requirements (July 2025) provides the basis for ensuring that the revised NPF takes effect within the planning system in a plan-led manner as required by the Act and react to the need for development plans to be updated to reflect the requirements of the NPF in relation to housing.

Under the S.28 Guidelines, Louth County Council are required to plan for 1,677 new homes per annum to 2034, significantly above the previous target as well as a required headroom of 50%. Policy Objective 1 of the Guidelines requires that these new targets be reflected in revised core strategies and settlement-level allocations. This means that Louth's County Development Plan should be providing for an 82% increase in housing allocation across all settlements.

Small Towns, Villages and the Rural Area:

In the Louth County Development Plan 2021-2027 the combined population of the designated Small Towns and Villages, Rural Nodes and the Rural Area equated to 32% of the population of the county. The entire housing allocation (within the current CDP) for County Louth from 2021-2027 is 6,524, with the Small Towns and Villages allocated 719 (11%) of this figure. Should Louth County Council apply the proportional allocation to the revised NPF Implementation figure of 1,677 per annum plus 50% headroom (required to address potential non-



activation of lands), there will be a target delivery of 276 new homes per annum in the small towns and villages, rural nodes and the rural area for the next 10 years.

If growth is to continue in accordance with National and Regional planning policies, it will be necessary to identify additional lands to meet the housing targets for the county within the NPF. It would be more appropriate to locate additional houses in Small Towns and Village, or on serviced sites in clusters, rather than one-off houses or un-serviced land in the open countryside.

Suggested Response

The submission requests that the Planning Authority consider all options for the delivery of housing on land that has access to public services. This, together with the NPF housing targets will result in the expansion of existing settlement boundaries of small towns and villages like Baltray and Termonfeckin and rural nodes, where appropriate.

The new Development Plan should facilitate developer-led serviced site schemes in line with National and Regional policies. This could be delivered through the creation of a zoning objective at appropriate locations that would allow for the development of a serviced site scheme to cater for self-builders as a viable alternative to one-off housing in the open countryside.

If necessary, areas that have services and capacity to absorb more low-density housing outside, but close to, existing settlements should be included within the relevant settlement boundary, albeit disconnected. There is precedent for this approach e.g. Collon and Clogherhead.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the importance of the Small Towns and Villages within the overall settlement hierarchy for the county.

The Section 28 Guidelines 'NPF Implementation: Housing Growth Requirements' were published in July 2025. There is a requirement under these Guidelines for a 'Settlement Capacity Audit' to be carried out to determine if there are sufficient zoned and serviced lands available to meet the projected housing requirement provided for in the Guidelines (inclusive of headroom) for the remainder of the Development Plan period. This Settlement Capacity Audit is separate to the Development Plan Review and was ongoing at the time of writing.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft Plan. The distribution of this housing allocation will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development. A review of land use zonings will be carried out for each settlement to determine whether additional lands would be required to be zoned to facilitate the delivery of the housing allocation for each settlement. This will be published in a Settlement Capacity Audit for the County as part of the Draft Plan.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the land zonings and/or settlement boundaries in the Draft Plan and to lodge a submission at this stage of the process in relation to their lands if necessary.

Chief Executive Recommendation:

To review the settlement hierarchy and core strategy for the county in line with relevant national and regional



policy and guidance.

To incorporate the housing allocation for Louth as provided for in the 'NPF Implementation Housing Growth Requirement Guidelines' into the core strategy of the Draft Plan.

To review the existing capacity and land zoning requirements of settlements in line with the core strategy.

To include relevant policy objective(s) to support and facilitate rural regeneration such as identifying opportunities for serviced sites within settlements.

Submission Ref. No:

LH-C144-DPIP-210

Submitted By:

Meath County Council

Summary of Main Issues Raised:

Welcomes the commencement of the review of the Louth Development Plan and the opportunity to engage in the consultation process. The vision for Louth is acknowledged. Meath County Council recognises the importance of collaboration with adjoining Local Authorities in the achievement of cohesive development and efficient delivery of services.

Status of the Meath County Plan is outlined. The review of the current Meath County Development Plan for 2027-2033 is ongoing with the Draft Plan anticipated to be on display in Q3 of 2026. Comments in respect of Issues Paper are outlined below:

Drogheda

Drogheda is a regional Growth Centre. The Southern Environs of Drogheda lies within the jurisdiction of Meath County Council. As a result of a High Court Order A2 New Residential Phase 2 were amended to 'WL White Lands'. The Department published the '*NPF Implementation: Housing Growth Requirement*' guidelines in July 2025.

The Guidelines have allocated a new annual housing growth requirement of 2,942 units + 50% additional provision to County Meath. Meath County Council are currently in the process of assessing the Meath County Development Plan 2021-2027, against the requirements of the Section 28 Guidelines. In accordance with both the High Court Order and Section 28 Guidelines, Meath County Council intends to incorporate these new housing targets and zone an appropriate quantum of lands in the county for the remaining period of the current Meath County Development Plan 2021-2027. It is anticipated that a variation will be published in Q1 of 2026.

Drogheda Joint Local Area Plan

The Pre-Draft Issues Papers for the Drogheda Joint Local Area Plan (LAP) was published in January of 2024; 153 submissions were received and a comprehensive report on the submissions was subsequently published. The plan has been delayed for several reasons however Meath County Council looks forward to working together with Louth in determining the next steps of the Joint Plan making process.

Dublin – Belfast Economic Corridor

The Dublin to Belfast Corridor plays a critical role in supporting economic growth and competitiveness. National Policy Objective 57 and Section 4.7.2.1 of the Meath County Development Plan 2021-2027 are quoted. Meath County Council remains committed to supporting population and economic growth along the Dublin- Belfast Economic Corridor in line with national and regional policies. The submission suggests that a specific policy and supporting body text be included in the Louth County Development Plan in this regard.



Boyne Valley Greenway (Drogheda – Mornington)

Section 4.28.5 of the Meath County Development Plan 2021-2027 recognises the importance of greenways and outdoor recreational activities. Policy Objective BLMD OBJ 11 from the Meath County Development Plan is quoted. The Mornington Drogheda section of the Greenway was refused by An Bord Pleanála. The Council remain committed to obtaining all relevant assessments and consents. Request that Louth County Council incorporate a similar objective to BLMD OBJ 11 in the next Louth County Development Plan.

Environment

It is important that both Local Authorities have the same high standards regarding the protection of the environment, there should be a high level of consistency therefore cognisance should be taken of the policies and objectives of the Meath County Development Plan 2021-2027.

Landscape Character

The Meath County Development Plan 2021-2027 contains a Landscape Character Assessment for the County. The area adjacent to the Louth County boundary consists of four Landscape Character Areas: North Navan Lowlands, Rathkenny Hills and Upland Area, Boyne Valley River Corridor and Estuary and Coastal Landscape. These designations should be considered in the context of development proposals in Louth having regard to cross border visual impact. It is requested that the Development Plan be cohesive with the landscape character areas in County Meath, specifically along the county boundary line.

Nature Designations

Chapter 8 of the Meath County Development plan lists 13 Natura Sites within County. There are four Natura 2000s sites located along the Meath-Louth County border. Planning Authorities are required to ensure that an Appropriate Assessment of the implications of proposals on designated nature conservation sites (Natura 2000) is undertaken. Cross county co-operation regarding these sites will continue to be essential.

Brú na Bóinne UNESCO World Heritage Site

In 2024, Meath County Council varied the Meath County Development Plan 2021-2027. Part of this variation involved a mapping correction to Map 8.1 Brú na Bóinne World Heritage Site map in Volume 3 of the Meath County Development Plan 2021-2027. Meath County Council respectfully asks for Louth County Council to include the updated Brú na Bóinne boundary in the new County Development Plan.

Chief Executive Opinion on Issues raised:

The comments from Meath County Council are welcomed and the Chief Executive is looking forward to continuing to work in collaboration to achieve sustainable cohesive development and efficient delivery of services.

Drogheda

It is acknowledged that the Meath County Development Plan may need to be varied to provide additional residentially zoned land having regard to the High Court Order and the Section 28 Guidelines '*NPF Implementation: Housing Growth Requirements*'.

Drogheda Joint Area Plan

The Chief Executive is also committed to working with Meath County Council to ensure a cohesive approach to the future development of Drogheda. This will continue to be reflected in the narrative text and policy objectives of the new plan.

Dublin – Belfast Economic Corridor



The Chief Executive would concur that the Dublin- Belfast Economic corridor is a key driver for population, economic growth and competitiveness in the Regional Growth Centres of Dundalk and Drogheda and in the wider region. The new Louth County Plan will continue to provide narrative text and policy objectives which fully recognised and support the Dublin-Belfast Corridor.

Boyne Valley Greenway (Drogheda – Mornington)

The provision of greenways is supported by National, Regional and Local planning policy. The Chief Executive considers that greenways are essential pieces of infrastructure that provide a valuable recreational amenity that promotes an active and healthy lifestyle and are important tourism assets. The Draft Development Plan will continue to support the progression of greenway projects in the County, taking account of the social, community, economic, and tourism benefits this infrastructure can bring to an area. The Chief Executive will continue to work in conjunction with Meath County Council in progressing the Drogheda to Mornington section of the Boyne Greenway.

Environment

County Louth boasts a rich natural environment, which contributes substantially to the County's character, identity and sense of place, in addition to the well-being and the quality of life of those living in and visiting the County. The current County Plan contains a suite of policy objectives throughout the document which assist in ensuring the protection, maintenance and enhancement of a high-quality environment, the new Plan will continue to emphasis environmental protection.

Landscape Character

One of its core objectives of The National Landscape Strategy (NLS) 2015-2025 is to develop a National Landscape Character Assessment which would provide consistency on how to characterise and connect with the landscape. It is fully supported in both the National Planning Framework (NPF) and the Eastern and Midland Regional Spatial and Economic Strategy (EMRSES). Upon publication of the National Landscape Character Assessment, a review of Louth landscape character areas shall be carried out. The visual impact of any development proposal will be fully assessed and shall have regard to the landscape character of the surrounding area including Meath.

Nature Designations

Meath's rich array of European sites are acknowledged and Appropriate Assessment (AA) of plans and projects likely to affect European Sites will continue to be undertaken.

Brú na Bóinne UNESCO World Heritage Site

Louth County Council will include the updated Brú na Bóinne boundary in the new County Development Plan.

Chief Executive Recommendation:

To provide narrative text and policy objectives which support a joint plan for Drogheda.

To continue to provide narrative text and policy objectives which fully recognised and support the Dublin-Belfast Corridor.

To continue to provide policy support for the delivery of the greenway projects in the County in the Draft County Development Plan 2027-2033 and to review all policy objectives relating to greenways in the 2021-2027 County Development Plan.

To continue to provide narrative text and policy objective which ensure the protection, maintenance and enhancement of a high-quality environment.

Include an updated Brú na Bóinne boundary in the Draft Plan.



Submission Ref. No:

LH-C144-DPIP-212

(refer to 213 & 218)

Submitted By:

Irish Concrete Federation (ICF)

Summary of Main Issues Raised:

ICF requests that, in developing its new County Development Plan, the Council considers the findings of ICF's recent (May 2025) publication 'Essential Aggregates – An Evidence-Based Assessment to Inform Ireland's Planning Policy'. A report was commissioned to examine current replenishment rates of authorised aggregate reserves in Ireland. The submission outlines the findings of the Report.

It is stated that Aggregates are a finite resource and can only be accessed where they physically exist. ICF is currently engaging with Government on the need for a National Policy Statement to facilitate the long-term sustainable supply of essential aggregates, which can be implemented at regional and local planning level.

It is stated that County Development Plans must include specific provisions to ensure that replenishment of authorised aggregate reserves is sufficient to meet local needs.

Planning policy for aggregates must reflect the following:

- i. Aggregate materials (stone, sand and gravel) are a strategic national resource, essential for the future development of Ireland.
- ii. The targets and objectives of 'Housing for All', 'Project Ireland 2040' and the 'Climate Action Plan' will require an adequate and steady supply of aggregates over the long term.
- iii. Addressing Ireland's significant infrastructure deficits in the areas of housing, health, transport, and electricity will depend on the provision of a stable supply of aggregates of the required quality.
- iv. Aggregates can only be accessed where they occur and that the location of an aggregates deposit, is determined by geology.
- v. Access to high-quality aggregates is essential to reducing construction costs and carbon transport emissions.
- vi. Competing pressures on land use will make it increasingly difficult to find suitable extraction locations.
- vii. Important reserves of aggregates must be identified and protected from development that might prejudice their utilisation.
- viii. Increasing secondary (recycled) aggregates will eventually help to reduce demand, but unlikely to meet a significant proportion of demand in the short term.
- ix. Our island status, makes security of supply a critical issue.
- x. The planning system needs to ensure that the replenishment rate of authorised aggregate reserves is sufficient.
- xi. Aggregates should be extracted in a sustainable manner, compatible with the protection of the environment, heritage and the quality of life of residents.

Policy Context:

National Planning Framework (April 2025) outlines the importance of extractive industries and that the planning system has a key role in identifying and protecting natural resources, subject to the protection of the environment etc. and in accordance with EU policies.



Chief Executive Opinion on Issues raised:

The Chief Executive recognises the important function and role that the quarrying, concrete and aggregate sector have on the county, which is fundamental in delivering key infrastructure and development for the county and wider country.

The Council acknowledges that a satisfactory balance is required between the needs of the building industry and the need to protect the environment. The creation of a National Policy Statement to facilitate the long-term sustainable supply of essential aggregates, is a matter of National Government and lies outside the remit of the Chief Executive to address.

Within County Louth – there are areas of high to very high potential for crushed rock deposits which are focused on the Cooley peninsula and an area from Collon to Clogherhead which is identified as having high potential. The Council recognises the unique importance of these areas in terms of environmental, archaeological and historical value.

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.

It is accepted that the County possesses a finite number of natural resources, and relevant policy provisions, narrative, and land zonings will be formulated accordingly. Existing policies will also be reviewed and updated accordingly.

Chief Executive Recommendation:

To review the existing policies within the LCDP 2021-2027 and have regard to the publication ‘Essential Aggregates – An Evidence based assessment to inform Ireland’s Planning Policy’, develop policy objectives, narrative and objectives to ensure the secure and reliable supply of raw materials for development within the County and wider region.

Submission Ref. No:

LH-C144-DPIP-213

(refer to 212 & 218)

Submitted By:

SLR Environmental Consulting (Ireland) Ltd on behalf of Roadstone Limited

Summary of Main Issues Raised:

Roadstone have a quarry property asset located at Collon.

Submission is accompanied by the following documents:

- Essential Aggregates Providing for Ireland's Needs to 2040 and,
- Essential Aggregates - An Evidence Based Assessment to Inform Ireland's Planning Policy.

Planning Context:

National Planning Framework (NPF 2040)

Submission outline's the purpose of NPF and relevant National Strategic Outcomes. Narrative text is quoted in relation to aggregates and minerals. The submission also refers to NPO 30 and 50.



It is stated that the Regional Spatial and Economic Strategy (RSES) supports the circular economy and encourages a reduction in waste. The Strategy also outlines the importance of Drogheda Port. The submission refers to RPO 6.7 and 4.12.

Essential Aggregates – Providing for Ireland’s Needs to 2040

The objective of the document is to highlight to the Government the need for a National Policy Statement to facilitate the long-term sustainable supply of essential aggregates, which can be implemented at regional and local planning level thereby ensuring the sustainable supply of aggregates for Project Ireland 2040 and beyond.

The document provides further detail on the role of locally supplied aggregates in supporting the demand for new homes, new schools, and better infrastructure. The key findings and suggestions for inclusion in the national planning policy are outlined. It is requested that the Council have regard to these when drafting the new Plan and that specific provisions are included to ensure that the replenishment of authorised aggregate reserves is sufficient to meet local needs.

Louth County Development Plan Policies - Local Policy Context:

Strategic Objectives S01 & S02 of the County Development Plan are outlined. Reference is also made to the importance of Drogheda Port in terms of importing and exporting local materials reference is made to Policy Objectives MOV 52 and SS9. Narrative text from the County Development Plan is provided with respect to the rural economy and the extractive industry, this is supported by Policy Objectives ENV 42 and 43.

Roadstone Ltd. want to ensure that any aggregate resources and any future proposals on the subject lands, are supported with appropriate policies and objectives within the new County Development Plan.

Settlement & Housing

The submission acknowledges that County Louth has a growing population. This continued growth confirms the need for additional services and housing.

The extractive industry provides the necessary raw materials for most of the building and infrastructure development in Ireland. Not only homes but also roads, motorways, schools, hospitals, colleges, factories, water and sewerage systems.

Due regard should be given to the fact that the county has significant but finite mineral resources, and it should be the aim of the proposed CDP to safeguard areas of significant resources from incompatible developments.

Rural Development

Aggregate resources are not evenly distributed across the Country or County and can only be worked where they occur naturally. They are essentially a finite resource, once extracted they will not be replaced. The revised Plan should ensure that the extraction of aggregates can take place in suitable locations where the resource exists.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the important function and role that the quarrying, concrete and aggregate sector have on the county, which is fundamental in delivering key infrastructure and development for the county and wider country.

Louth County Council acknowledges that a satisfactory balance is required between the needs of the building industry and the need to protect the environment.

The creation of a National Policy Statement to facilitate the long-term sustainable supply of essential aggregates, is a matter of National Government and lies outside the remit of the Chief Executive to address.



Within County Louth there are areas of high to very high potential for crushed rock deposits which are focused on the Cooley peninsula and area from Collon to Clogherhead which is also identified as having high potential. The Council recognises the unique importance of these areas in terms of environmental, archaeological and historical value.

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.

It is accepted that the county possesses a finite amount of natural resources, and relevant policy provisions, narrative, and land zonings will be formulated accordingly. Existing policies will also be reviewed and updated accordingly.

Chief Executive Recommendation:

To review the existing policies within the LCDP 2021-2027 and have regard to the publication ‘Essential Aggregates – An Evidence based assessment to inform Ireland’s Planning Policy’, to develop policy objectives and narrative text to ensure the secure and reliable supply of raw materials for development within the county and wider region.

Submission Ref. No:

LH-C144-DPIP-215

(refer to 221, 224, 301, 340 & 363).

Submitted By:

Patrick Smyth

Summary of Main Issues Raised:

As part of the County Development Plan review, the submission highlights the importance of requiring comprehensive construction coordination frameworks in planning policy. The plan should stipulate that developers must engage proactively with all stakeholders including TII, Irish Rail, and public utility providers to ensure safe and efficient infrastructure delivery.

Construction traffic and heavy equipment movements can damage roads. Early engagement with TII and the Council’s Infrastructure Department must therefore be a statutory condition of permission. Likewise, consultation with Irish Rail should be mandatory where works occur within 1km of any railway alignment or bridge.

Utilities such as ESB, Uisce Éireann and Eir must be included in a single co-ordinated plan to avoid service disruption, accidental strikes, or contamination issues.

Embedding these standards in the County Development Plan will ensure construction projects are delivered safely, sustainably and in full compliance with national best practice.

Chief Executive Opinion on Issues raised:

The LCDP 2021-2027 currently requires the submission of a management plan of construction sites for any major planning application. This plan must include hours of operation, construction/phasing programme, traffic management, noise and dust mitigation measures, details of any construction lighting and the management of construction and demolition waste.

As part of the Development Management process, a range of statutory bodies are consulted in relation to a scheme, including those within the response, who may require the attachment of conditions such as bonds for

roads, keeping roads clear of debris, road management plans.

The above comments have been noted and will be considered in the preparation of the Draft Plan.

Chief Executive Recommendation:

Review existing policy provision, having regard to the above submission, which will inform the development of new policy objectives and narratives in the Draft Plan.

Submission Ref. No:

LH-C144-DPIP- 216

Submitted By:

SLR Environmental Consulting (Ireland) Ltd on behalf of Belgard Estates Limited

Map showing land subject to Submission:



Figure 1: Map included as part of submission illustrating subject lands (outlined in red).

Summary of Main Issues Raised:

Belgard Estates Limited hold lands in the townland of Mell zoned E1 General Employment.

1.0 Basis of Submission

National Planning Framework (NPF 2040) (Revised April 2025)

Submission specifically mentions National Strategic Outcomes 3, 5, 6 and 9. It states that Ireland 2040 includes both a vision and strategy which is underpinned by a series of National Policy Objectives and that the following are relevant; National Policy Objectives 14, 20, 57.

Regional Spatial and Economic Strategy for the Eastern Midland Region(RSES)

The principal purpose of the RSES is to support the implementation of the NPF. Submission specifically mentions Regional Strategic Outcome 1 and the desire to target significant growth in Regional Growth Centres, including Drogheda. Details are provided regarding the cross-boundary coordination along the Dublin - Belfast Economic Corridor and the Eastern Corridor extending to Rosslare Europort. The RSES supports a feasibility study for high-speed rail between Dublin and Belfast and enhanced rail services on the south-eastern line to include the extension of DART services to Drogheda. It is stated that the objective for Drogheda 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. In terms of employment opportunities, the RSES describes that Drogheda shall promote further employment growth based on the attractiveness of its assets and the quality of life offering for workers and residents. The Mill and Drogheda Institute of Further Education (DIFE) are mentioned. The submission states that the following Regional Policy Objectives (RPO)s are relevant to Drogheda RPO 4.11, RPO 4.13, RPO 4.14, RPO 4.18.

Louth County Development Plan 2021-2027

The submission provides population figures and highlights the Policy Objectives which relate to regional growth centres and population targets; CS10, CS11, CS12 and CS13. The site to which this submission pertains is located within the northern environs of Drogheda where there is extensive land bank of employment, residential, and community zoned lands. The submission references Policy Objectives SS11 and EE37.

Pre-Draft Issues Paper

The Pre-Draft Issues Paper notes that submissions with respect to zoning of land cannot be addressed at this stage. In relation to the submission site, Belgard Estates Ltd. want to ensure that the existing use and zoning on the subject lands, is continued within the new County Development Plan, unless otherwise requested by Belgard Estates during the next stage of this plan review process. The following areas are considered important in ensuring that existing and any future proposed developments on these lands are feasible under the Louth County Development Plan 2027-2033: Regeneration, Movement and Water Services Infrastructure and Utilities.

Chief Executive Opinion on Issues raised:

The purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this submission at this stage.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-217

Submitted By:

SLR Environmental Consulting (Ireland) Ltd on behalf of Murrough Holdings Limited

Map showing land subject to Submission:

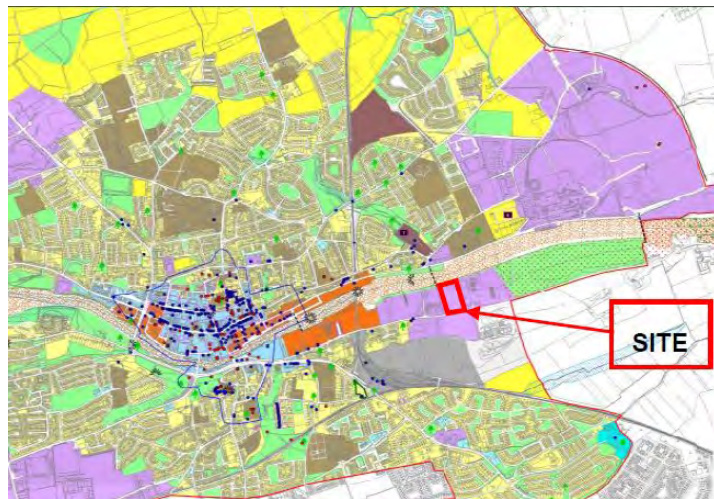


Figure 1: Map included as part of submission illustrating subject lands (outlined in red).

Summary of Main Issues Raised:

Belgard Estates Limited holds property on the southern bank of the River Boyne zoned E1 General Employment.

2.0 Basis of Submission

National Planning Framework (NPF 2040) (Revised April 2025)

Submission specifically mentions National Strategic Outcomes 3, 5, 6 and 9. It states that Ireland 2040 includes both a vision and strategy which is underpinned by a series of National Policy Objectives and that the following policies are relevant to the submission; National Policy Objectives 14, 20, 57.

Regional Spatial and Economic Strategy for the Eastern Midland Region (RSES)

The principal purpose of the RSES is to support the implementation of the NPF. The submission specifically mentions Regional Strategic Outcome 1 and the desire to target significant growth in these Regional Growth Centres, including Drogheda. Details are provided regarding the cross-boundary coordination along the Dublin-Belfast Economic Corridor and the Eastern Corridor extending to Rosslare Europort. The RSES supports a feasibility study for high-speed rail between Dublin and Belfast and enhanced rail services on the south-eastern line to include the extension of DART services to Drogheda. It is stated that the objective for Drogheda 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. In terms of employment opportunities, the RSES describes that Drogheda shall promote further employment growth based on the attractiveness of its assets and the quality of life offering for workers and residents. The Mill and Drogheda Institute of Further Education (DIFE) are mentioned. The submission states that the following Regional Policy Objectives (RPO)s are relevant to Drogheda RPO 4.11, RPO 4.13, RPO 4.14, RPO 4.18.



Louth County Development Plan 2021-2027

The submission provides population figures and highlights the Policy Objectives which relate to regional growth centres and population targets; CS10, CS11, CS12 and CS13. The submission references Policy Objectives SS11 and EE37.

Pre-Draft Issues Paper

The Pre-Draft Issues Paper notes that submissions with respect to zoning of land cannot be addressed at this stage. In relation to the submission site, Murrough Holdings Ltd. want to ensure that the existing use and zoning on the subject lands, is continued within the new County Development Plan, unless otherwise requested by Murrough Holdings Ltd during the next stage of this plan review process. The following areas are considered important in ensuring that existing and any future proposed developments on these lands are feasible under the Louth County Development Plan 2027-2033: Regeneration, Movement and Water Services Infrastructure and Utilities.

Chief Executive Opinion on Issues raised:

The purpose of the pre-Draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this submission at this stage.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission at that time.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-218

(refer to 212 & 213)

Submitted By:

SLR Environmental Consulting (Ireland) Ltd on behalf of Irish Cement Limited

Summary of Main Issues Raised:

Irish Cement has several property assets within the Meath County Council administrative area, near the Meath-Louth administrative border, namely Donore Quarry and Platin (cement works and quarry).

Submission is accompanied by the following documents:

- Essential Aggregates Providing for Ireland's Needs to 2040 and,
- Essential Aggregates -An Evidence Based Assessment to Inform Ireland's Planning Policy.

Planning Context:

National Planning Framework (NPF 2040)



Submission outline's the purpose of NPF and relevant National Strategic Outcomes. Narrative text is quoted in relation to aggregates and minerals. The submission also refers to NPO 30 and 50.

It is stated that the Regional Spatial and Economic Strategy (RSES) supports the circular economy and encourages a reduction in waste. The Strategy also outlines the importance of Drogheda Port. The submission refers to RPO 6.7 and 4.12.

Essential Aggregates – Providing for Ireland's Needs to 2040

The objective of the document is to highlight to the Government the need for a National Policy Statement to facilitate the long-term sustainable supply of essential aggregates, which can be implemented at regional and local planning level thereby ensuring the sustainable supply of aggregates for Project Ireland 2040 and beyond.

The document provides further detail on the role of locally supplied aggregates in supporting the demand for new homes, new schools, and better infrastructure. The key findings and suggestions for inclusion in the national planning policy are outlined. It is requested that the Council have regard to these when drafting the new Plan and that specific provisions are included to ensure that the replenishment of authorised aggregate reserves is sufficient to meet local needs.

Louth County Development Plan Policies - Local Policy Context:

Strategic Objectives SO1 & SO2 of the County Development Plan are outlined. Reference is also made to the importance of Drogheda Port in terms of importing and exporting local materials reference is made to Policy Objectives MOV 52 and SS9. Narrative text from the County Development Plan is provided with respect to the rural economy and the extractive industry, this is supported by Policy Objectives ENV 42 and 43.

Roadstone Ltd. want to ensure that any aggregate resources and any future proposals on the subject lands, are supported with appropriate policies and objectives within the new County Development Plan.

This submission would like to make the following considerations to be considered in reviewing the LCDP:

- To further develop and increase our use of the port and provide greater economic benefit to the area.

Drogheda Port

Louth's advantageous position along the Dublin-Belfast Economic Corridor offers considerable benefits for investment, owing to its superior connectivity, access to skilled talent, and robust infrastructure.

The region enjoys proximity to both capital cities, a substantial population catchment area with a skilled workforce, and a well-developed transport network, which includes the M1 motorway and rail services, thereby enhancing access to markets, ports, and airports.

The submission outlines potential improvements to Drogheda Port.

Settlement & Housing

The submission acknowledges that County Louth has a growing population. This continued growth confirms the need for additional services and housing.

The extractive industry provides the necessary raw materials for most of the building and infrastructure development in Ireland. Not only homes but also roads, motorways, schools, hospitals, colleges, factories, water and sewerage systems.

Due regard should be given to the fact that the county has significant but finite mineral resources, and it should be the aim of the proposed CDP to safeguard areas of significant resources from incompatible developments.

Rural Development

Aggregate resources are not evenly distributed across the Country or County and can only be worked where



they occur naturally. They are essentially a finite resource, once extracted they will not be replaced. The revised Plan should ensure that the extraction of aggregates can take place in suitable locations where the resource exists.

Chief Executive Opinion on Issues raised:

The Chief Executive recognises the important function and role that the quarrying, concrete and aggregate sector have on the county, which is fundamental in delivering key infrastructure and residential development for the county and wider country.

The Council acknowledges that a satisfactory balance is required between the needs of the building industry and the need to protect the environment.

The creation of a National Policy Statement to facilitate the long-term sustainable supply of essential aggregates, is a matter of National Government and lies outside the remit of the Council to address.

Drogheda Port is an important asset to the town and surrounding area due to the connectivity it provides to international markets and the employment it creates. The Draft Plan will include a narrative and associated policy objectives that support the ongoing investment and expansion of Drogheda Port, subject to compliance with the relevant planning and environmental criteria. The Draft Plan will continue to promote the sustainable growth of the port facility and surrounding lands.

It is accepted that the county possesses a finite amount of natural resources, and relevant policy provisions, narrative, and land zonings will be formulated accordingly. Existing policies will also be reviewed and updated accordingly.

Chief Executive Recommendation:

To review the existing policies within the LCDP 2021-2027 and have regard to the publication 'Essential Aggregates. An Evidence based assessment to inform Ireland's Planning Policy', develop policy objectives and narrative text to ensure the secure and reliable supply of raw materials for development within the county and wider region.

To seek to ensure that Drogheda Port can operate effectively and provide strategic support to the local and regional economy.

Submission Ref. No:

LH-C144-DPIP-219

Submitted By:

Ellen Mathews of Drogheda Vacancy and Dereliction Group

Summary of Main Issues Raised:

Submission welcomes the opportunity to engage as part of the Louth County development Plan public consultation process. The Drogheda Vacancy & Dereliction group (DVD) were set up in 2023 concerned about the alarming rise in vacancy and widespread dereliction in the town.

Dereliction & Vacancy

The DVD seeks to continue the positive and constructive engagement with Louth County Council to address dereliction and support a vibrant town.



The Draft Plan should recognise the need for change specifically regarding the policies and approach to Drogheda. A specific Drogheda rejuvenation plan is required like Balbriggan, Limerick 2030 and Westport 2000. Evidence based data should be compiled on the extent of dereliction, vacancy and shop types in the town centre.

The loss of key players like Marks and Spencer, Dunnes Stores on West Street, Hallmark, Kieran's Butchers and Mc Kenna Man clothes shop indicate the extent of town centre decline taking place.

New policy approaches must be taken to halt this decline.

Drogheda's Population Growth

Drogheda's population growth and demographics coupled with its strong potential for heritage, tourism, retail and experiential offerings presents a challenge for sustainable regeneration. The existing town centre has a high level of vacancy and dereliction which is at variance with the town's two busy retail parks on the outskirts of Drogheda. The northern environs are delivering low density suburban housing which is at odds with national policy which promotes higher densities along public transport corridors and are less car dependant.

The increase in the town population presents a challenge where a critical population mass creates and Drogheda now needs urgently to address the issues placed by the neglected town centre.

Town Centre Issues

Poor quality shopfront design has further compounded the attractiveness of the town centre. A dedicated town centre Officer or Architect is required to be employed to address these matters.

The 15-minute city or 20-minute neighbourhood, popularised in many European and UK city policies, could become a cornerstone in the Louth County Development plan 2027-2033.

The Draft Plan should implement policies that diversify and support town centre living, short-term stays, holiday and weekend stays, housing for older persons, students and apprentices and family-oriented housing projects. This must be a long-term vision for Drogheda.

The proliferation of certain shop types; vape shops, pound stores, betting shops, casinos etc have become the dominant theme on Drogheda's streets.

The Council's positive and proactive progress with the Derelict Sites Register should be further supported in the new development plan's policy. An office- based presence in Drogheda town centre is required. The powers available within the Compulsory Purchase Order process should be used to address the lack of activity taken by vacant property landowners.

Drogheda's Future Policy context

The failure of the joint Local Area Plan to make meaningful progress is failing the people of Drogheda. The new Plan should deliver specific policies to deliver on cross county issues; these include the arterial routes into the town, suburban retail nodes, and delivering of parks and playgrounds.

The severing of Drogheda from its natural hinterland to the south where much of the suburban development falls under the jurisdiction of Meath County Council must be corrected. The Louth/Meath local authority jurisdiction function areas can lead to inertia and inaction, such as the lack of playground in the south suburban area of Drogheda despite the large number of housing estates in the area. The housing developments of Wheaton Hall, Bryanstown or along the Dublin Road before Colpe Cross require an amenity external recreational space for families and children.

Active Travel Projects

The hard car dominated routes into the town have been reviewed by Active travel bodies and others. There is a



need for Drogheda to become a modern pedestrian-friendly, sustainable town.

Measures for supporting cyclists, pedestrians, buggy and wheelchair user to use the streets and footpaths should be prioritised and implemented.

Small scale interventions such e.g.

- The railings impeding the pedestrians rather than assisting at the junctions of Bryanstown traffic lights and the Dublin Road and at the train flyover on the Dublin Road.
- The pedestrian crossing, located in Meath CC, at the T-junction between Beamore Road and the Cross route should be better designed to make it safer.
- The entrance to the dairies (formerly Glanbia on the Dublin Road), which prioritises articulated trucks and tankers exiting and entering over the many pedestrians that walk that route from Drogheda and train station.
- The roundabouts at Colpe Cross which serve primarily the motorist, forcing pedestrians down dead-leg roads and leave them waiting for a break in traffic to make a dash across the road.
- A review of all walking routes into and out of the town to install dished kerbs, blister paving, remove impediments to pedestrians passing, install safe crossings at appropriate locations to reduce the number of circuitous routes pedestrians must take to have to cross a road safely.

Chief Executive Opinion on Issues raised:

Drogheda – is a Growth Centre

The designation of Drogheda as a Regional Growth Centre in national and regional policy is a recognition of the strategic importance of Drogheda as a location for employment growth and economic development. Louth County Council will in cooperation with Meath County Council review their development plans having regard to National and Regional policies/ principles as set out in the NPF and RSES which will be transposed into the Louth and Meath County Development Plans.

With regards to the Development Plan Review, the housing allocation provided for in the Housing Growth Requirement Guidelines will be incorporated into the Core Strategy of the Draft plan. The distribution of this housing will take account of a range of factors including the settlements designation in the settlement hierarchy, recent patterns of development, infrastructure availability/constraints, availability of social and community infrastructure, and the general capacity of the settlement to absorb development.

Vacancy/Dereliction

The concerns in relation to vacancy and dereliction in Drogheda are acknowledged and the Draft County Plan will support the regeneration and urban renewal of Drogheda. As part of the Government's Town Centre First Strategy several initiatives and schemes have been implemented to assist in regenerating the town centre and bringing vacant buildings back into use. This includes the introduction of planning exemptions for the conversion of certain types of vacant commercial property into residential use and a Vacant Property Grant that provides a grant for the refurbishment of vacant properties into residential use.

Legislation has also been introduced that would allow a Local Authority to introduce a temporary abatement of rates for vacant properties. Whilst the management and implementation of these initiatives is outside the remit of the Draft Plan support will be provided for them in the policy framework of the Plan.

Louth County Council have a dedicated team looking after town centre regeneration. This team will be tasked with preparing a specific Drogheda rejuvenation plan in consultation with traders and the public on the extent of interventions required to halt the extent of dereliction, vacancy within the town centre. This team will look at regeneration projects to stimulate enhancements within the town centre. The importance of a clean urban



environment and the appearance and presentation of buildings, streets and signage is recognised and plays a vital role in attracting people to live, work and do business in the urban area of Drogheda.

Incentivising and encouraging a vibrant and sustainable town centre for Drogheda is a key theme of the LCDP and will be a key objective of the Council. Louth County Council have already brought forward specific town centre projects tasked with regeneration and reducing the amount of vacancy and dereliction within Drogheda Town Centre e.g. Westgate Vision and Townscape Recovery Guide. An application for public realm works to the Westgate area has been granted by An Coimisiún Pleanála, with the overall aim of the project to make the town centre a more attractive destination.

While the appointment of a dedicated town centre Officer or Architect for Drogheda town centre to address town centre developments lies outside the scope of the Draft plan, this approach can be adequately addressed through the development management process or creation of appropriate town centre policies which align with the 'Town Centre First' policy framework of the plan.

Town Centre Improvements

The aim of revitalising towns and urban areas is strongly reflected in the objectives and priorities of the National Planning Framework. There is a focus on improving towns and delivering more compact settlements by prioritising population, residential and employment growth on infill and brownfield lands and in areas close to services and amenities.

The Town Centre of Drogheda will seek to support the expansion or diversification in the range of uses in the town centre, particularly in vacant or under-utilised buildings and spaces, that takes account of the changing nature of retail and the need to provide shoppers and visitors with an 'experience' that will encourage them back on a regular basis. Such uses include the provision of a mix of shopping, leisure, office, and residential uses in an attractive and family friendly environment. This approach will ensure that the town centre can adapt to change in the retail sector and is consistent with the Government's Town Centre First policy.

Living Cities Initiative

As part of the Budget for 2026 The Living City Initiative has been expanded to include Drogheda and Dundalk, offering significant tax incentives for refurbishing older buildings, converting 'over the shop' spaces into homes, and revitalising town centres by extending eligibility to properties built before 1975. This move aims to bring new life to these urban areas, support local enterprise, protect heritage, and boost housing, marking a major opportunity for regeneration and closer city status for Drogheda. The Draft Plan will support the implementation of the Living City Initiative in Drogheda and Dundalk.

Shopfronts

Shopfronts are one of the most important features in the character and perception of Dundalk's town centre. The Council are committed to promoting high quality shopfront design. The Draft plan will seek to protect traditional and original shopfronts and ensure that any alterations do not detract from their overall integrity. Applications for shopfronts shall be in accordance with the 'Shopfront Design Guidelines' for Louth County Council or any subsequent updated guidance.

Active Travel

A Transport Plan is currently being prepared for Drogheda where both Louth and Meath Council's will be engaging with the relevant stakeholders including the National Transport Authority, Irish Rail, and Transport Infrastructure Ireland. This will provide a policy framework for transport related developments in the town including the potential requirement for a train station in the north Drogheda area. The Transport Plan will also seek to promote more sustainable modes of travel including walking, cycling in addition public transport. A list of potential projects that would make active travel or public transport a more attractive or viable alternative to



the car will be included in the Transport Plan.

Active travel projects and measures for Drogheda have begun and an Active Travel Part 8 Scheme for the Rathmullan Road and Marley's Lane have been approved. It will provide a high-quality segregated pedestrian and cycling infrastructure to improve safety and promote active travel to and from Drogheda Town Centre.

Sports & Recreational Facilities

The importance of community and sports facilities is recognised as an essential aspect in the creation of sustainable, walkable and socially inclusive neighbourhoods within Drogheda and would accord with the 15-minute or 20-minute neighbourhood concepts which are in place in many European cities. The Draft Plan will support the development of community and sports facilities in Drogheda subject to normal planning criteria. The Council will review existing housing developments of Wheaton Hall and Bryanstown or along the Dublin Road to determine whether there is sufficient external recreational space for families and children.

Chief Executive Recommendation:

To support the implementation of various measures to counteract vacancy and dereliction throughout Drogheda urban area including the Living City Initiative.

Provide policy objectives which support the provision of the Government's 'Town Centre First Strategy'.

To support better quality urban design and provide guidelines for shopfront design and public realm improvements.

To refer to the national policy requirements for Drogheda which require collaboration between Meath and Louth Council as referenced in the submission.

To support provision of new sports facilities where there is an identified need and encourage multi use.

To incorporate the findings of the Drogheda Local Transport Plan into the Draft County Development Plan.

To support investment in sustainable transport infrastructure that will make walking, cycling or public transport more attractive and appealing, and facilitate accessibility for all, regardless of age, physical mobility, or social disadvantage.

Submission Ref. No:

LH-C144-DPIP-221

(refer to 215, 224, 301, 340 & 363)

Submitted By:

Paul Lane Jr

Summary of Main Issues Raised:

The opportunity to make a submission is welcomed.

Urge that stronger policies regarding construction management and inter-agency co-ordination are adopted.

Future developments in Louth must prepare a detailed Construction Environmental Management Plan, that is fully integrated with utility providers, Transport Infrastructure Ireland and Iarnród Éireann. The Construction Environmental Management Plan should demonstrate how construction activities will protect public roads existing infrastructure and nearby rail assets.

The Plan should also require that no large-scale projects should be approved without evidence of early liaison with Irish Water, ESB Networks and telecommunications operators to prevent conflict with underground and



overhead infrastructure.

By embedding these requirements into the Development Plan the Council will promote transparency, efficiency and safety during all stages of construction.

Chief Executive Opinion on Issues raised:

Chapter 13, Section 13.7 of the current County Plan states that a Construction Management Plan will be required for any major planning permission for residential, community, employment or infrastructure related development. Whilst Section 13.16.2 requires that any development in the vicinity of existing rail lines shall comply with the setbacks and construction requirements of Iarnród Éireann, the National Transport Authority, Transport Infrastructure Ireland, and any other relevant stakeholders. The Chief Executive would concur that developers should be encouraged to engage with relevant stakeholders prior to the submission of any planning application. The narrative text in relation to Construction Management Plans will be reviewed as part of the Plan process.

Chief Executive Recommendation:

Review narrative text in relation to submission of construction management plan and to include text which encourages early engagement with relevant stakeholders prior to submission of a planning application.

Submission Ref. No:

LH-C144-DPIP-224

(refer to 215, 221, 301, 340 & 363).

Submitted By:

Paul Lane

Summary of Main Issues Raised:

As part of the Plan review, I wish to highlight the importance of requiring comprehensive construction coordination frameworks in planning policy. The plan should stipulate that developers must engage proactively with all stakeholders; TII, Irish Rail, and public utilities providers to ensure safe and efficient infrastructure delivery.

Construction traffic and heavy equipment movements can damage roads. Early engagement with TII and the Council's Infrastructure department must therefore be a statutory condition of permission. Likewise, consultation with Irish Rail should be mandatory where works occur within 1km of any railway alignment or bridge.

Utilities such as ESB, Irish Water and Eir must be included in a single co-ordinated plan to avoid service disruption, accidental strikes, or contamination issues.

Embedding these standards in the CDP will ensure construction projects are delivered safely, sustainably and in full compliance with national best practice.

Chief Executive Opinion on Issues raised:

The Louth County Development Plan 2021-2027 currently requires the submission of a management plan for the construction of any major planning applications. This plan must include hours of operation; construction/phasing programme, traffic management, noise and dust mitigation measures, details of any



construction lighting and the management of construction and demolition waste.

As part of the Development Management process, a range of statutory bodies are consulted regarding a scheme, including those within the response, who may require the attachment of conditions such as bonds for roads, keeping roads clear of debris and traffic management plans.

The above comments have been noted and will be considered in the preparation of the Draft Plan.

Chief Executive Recommendation:

Review narrative text in relation to submission of construction management plan and to include text which encourages early engagement with relevant stakeholders prior to submission of a planning application.

Submission Ref. No: LH-C144-DPIP-225

Submitted By: Fáilte Ireland

Summary of Main Issues Raised:

The Objective of this Submission

The objective of this submission is to increase the policy coverage in the new Development Plan to ensure a meaningful framework is established for the enhancement of tourism in the County, and the wider region, during the Plan period. Fáilte Ireland’s vision is provided.

Vital that tourism is at the centre of the Louth County Development Plan 2027-2033. A successful tourism sector also creates significant benefits for many other sectors.

2. Strategic Issues Paper

County Louth has a strong tourism base which is primarily founded on unspoiled natural environment and a wealth of historic towns and archaeological sites such as those in the Cooley Peninsula, Boyne Valley, Monasterboice and Mellifont Abbey, amongst others. The County is strategically located along the Belfast-Dublin economic corridor.

The Tourism chapter should be retained in the new development plan and under pinned by Louth’s Tourism Strategy

Details are provided regarding the government’s Shared Island project. The Shared Island Destination Project on the Cooley Peninsula and Carlingford Lough will see a network of trailheads, trails and water access points delivered across the region, increasing connectivity between tourism assets and complemented by delivery of a cross-border Destination Experience Strategy to promote the region. The investment will harness the benefits of the Narrow Water Bridge as a linchpin for sustainable tourism and recreation activity around the whole Carlingford Lough area.

3. Suggestions for the New Development Plan

The submission provides a comprehensive list of items to be included with the tourism chapter along with proactive policies and objectives.

4. Additional Tourism Considerations are outlined:

- To acknowledge and recognise tourism as a key economic driver for the County which supports job creation and sustains communities.



- Support the development of quality & diverse accommodation offerings
- Support the growth of facilities for camper vans and 'Aires' in suitable and sustainable locations.
- Proactive planning policies including provision of supporting infrastructure such as visitor car parking, toilets etc.
- Support sustainable travel in the tourism sector by the promotion of public transport use and by undertaking enhancements to overall accessibility thereby making the County easier for visitors to navigate.
- Integrate the County's transport and tourism strategies to promote increasingly sustainable travel patterns among visitors to the County.
- Full realisation of the economic potential of increased visitor revenue and increased dwell time with high quality tourism infrastructure.
- Support and enhance the digital capability needs of the tourism industry through telecommunications infrastructure enhancement provision.
- Protection and enhancement of the tourism resource with information and interpretation provided and resources carefully managed and protected.
- The need for electric charge points has also become evident and there is an opportunity to grow Ireland's Ancient East as a sustainable destination by adequate provision of these.
- Support 'park & ride' facilities in known congestion spots in partnership with relevant stakeholders.
- Support enhancements to coastal access and infrastructure to enhance the visitor experience in outdoor recreation along the coastline and at beaches.
- Align Flood defence solutions/mechanisms with the tourism destinations needs and support infrastructure.
- Consider the potential of 'Oriel' as a place as a cultural driver for the County.

Tourism Amenities and Assets Maps

The new development plan should clearly set out tourism policies and objectives and include maps in the Development Plan.

Renewable Energy Strategy

To review and update their Renewable Energy Strategies. Provide a map which identifies areas suitable and unsuitable for the siting of energy infrastructure.

Landscape Character Assessment

The National Landscape Strategy 2015-2025 should inform the new development plan process. To achieve a more specific protection for tourism assets, the plan process should consider reviewing objectives protecting the integrity of key tourist amenities from negative visual and landscape impacts.

Chief Executive Opinion on Issues raised:

The Chief Executive welcomes the submission from Fáilte Ireland. The County has much to offer as a tourist destination, particularly its unspoilt natural environment, a rich and varied natural and built heritage, and man-made attractions. The Chief Executive will continue to work in collaboration with Fáilte Ireland to further develop Louth's tourism potential and will provide policy objective(s) which support cross border tourism.

The new County Development will continue to have a standalone a Chapter dedicated to Tourism and the 'I1 Tourism and Leisure' zoning shall be retained though it should be noted that tourism projects may also be permissible in other zonings, subject to normal planning criteria.

Chapter 6 of the current Louth County Development Plan shall be reviewed and updated having regard to the 'Suggestions' and 'Considerations' outlined in this submission. This Chapter will also be informed by the 5-year

Tourism Strategy (2025 – 2030) for County Louth.

All policies objectives and narrative text in relation to Renewable Energy will be reviewed and updated accordingly.

Chapter 8, Section 8.10.1 of the current County Development Plan relates to Landscape Character Assessments and Policy Objectives NGB 23, 24 and 25 relate to the preservation of the uniqueness of a landscape character so that development does not unduly damage or detract from the character of a landscape or natural environment. The text and associated policy objectives pertain to all types of development.

Chief Executive Recommendation:

Continue to support the development of tourism in County Louth and provide narrative text/policy objective(s) which support cross border tourism projects.

Review and update the Tourism chapter having regard to the ‘Suggestions’ and ‘Considerations’ outlined in this submission. This Chapter will also be informed by the 5-year Tourism Strategy for County Louth (2025–2030).

Review and update policy objectives and narrative text in relation to renewable energy.

Continue to provide narrative text and policy objectives in relation to landscape character and protection of same in relation to all development including those that are tourism related.

Submission Ref. No:

LH-C144-DPIP-226

Submitted By:

Stephen Little & Associates Chartered Town Planners
& Development Consultants on behalf of Castlethorn

Map showing land subject to Submission:

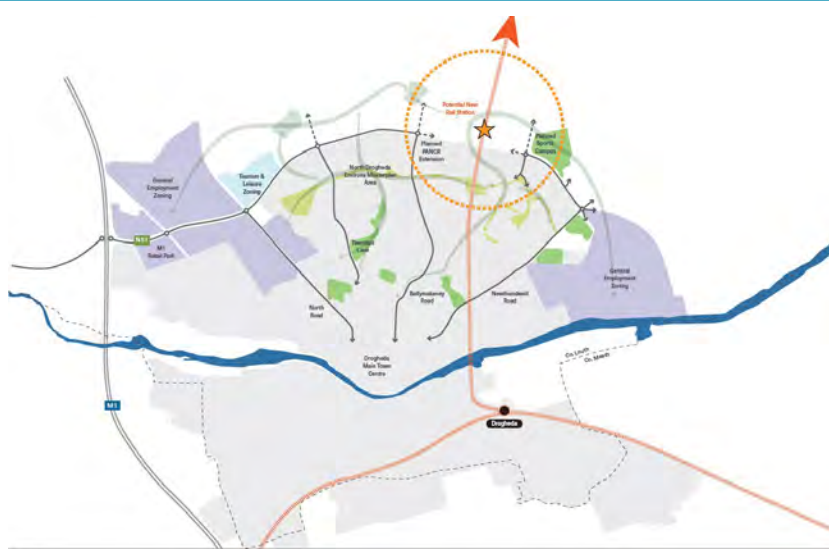


Figure 1: Map included as part of submission indicating the general location for a potential new rail station.



Summary of Main Issues Raised:

Introduction

Submission relates to the strategic potential for the Council to optimise the investment in infrastructure in North Drogheda by considering strategic lands for expansion and the creation of new residential led communities.

Issues Paper Themes

Core Strategy

The lands provide an opportunity for consolidation, compact growth and sustainable land use and transport planning. There is an opportunity to provide for a new railway station to the north thereby facilitating a sustainable mode of transport, making efficient use of infrastructure provided and delivering compact growth.

Settlement and Housing

The Housing Growth Requirements (July 2025) identifies that in Louth, there is a requirement of 1,677 units per annum between 2025-2034 and 1,195 units between 2035 and 2040. The Planning & Development Act 2024 provides for an expansion of Development Plan period from six years to ten years and that this provision is expected to be commenced in 2026. The minimum requirement for new homes in Louth would increase to 22,986 units.

The submission refers to the population growth in the Eastern and Midlands Region and Drogheda's role as a Regional Growth Centre. NPO 10, 15 and 95 for new residential development zoning, in the context of Transport Orientated Development and sustainable mobility are relevant.

Transport Orientated Development (TOD) is influential in deciding where development should occur. A new railway line could be located on the submission lands and it's critical that an adequate quantum of land is identified to ensure a robust pipeline of residentially zoned lands.

Eastern & Midlands Regional Spatial & Economic Strategy

Three cross cutting themes and objectives pertaining to growth in Drogheda are outlined. Under the RSES, it is envisaged that Drogheda would reach a target population of 50,000 people by 2031. The opening of a new rail station in the North Drogheda Environs area, would open a significant swathe of undeveloped lands and enable the development of a compact, rail-based settlement at this location.

Socio-Economic Rationale for Expanded Housing Delivery within the North Drogheda Environs.

Table provided demonstrates key findings that support the promotion of the strategic expansion of new transport-oriented, residential development lands in the northern environs of Drogheda.

Achievement of Compact Growth within and adjacent to the Built-Up Footprint along the Northern Rail Corridor

The lands are located adjacent to the Port Access Northern Cross Route (PANCR) and the rail line. The line is subject of Railway Order consent for the DART+ Coastal North expansion. The submission states that there is a significant, strategic opportunity for compact, transport-oriented development at the submission lands. Irish Rail are examining their rail network to determine where new stations could be located. The lands are positioned to build on the locational advantage of their proximity to significant high capacity and frequency public transport provision (existing and planned), to the existing environmental and social infrastructure.

Lands that can deliver Transport – Orientated Development.

Definition of Transport Orientated Development and key elements provided. Submission states that the concept



of Transport Oriented Development is embedded in Government policy.

Plan-led Development Opportunity

Chief Executives have been invited to consider opportunities for TODs and potential candidates for designation of Urban Development Zones (UDZ).

Reasons are provided as to why part of the submission lands centred around the future railway station would be a candidate site for UDZ designation; it is stated that the remaining lands may be better suited to a Local Area Plan. The scale of housing delivery will require both the expansion of existing settlements and the creation of new sustainable communities.

Lands north of the PANCR are well positioned to deliver sustainable sequential development, in the short term and more significant medium to long term, plan-led development aligned with the roll out of the DART+ Coastal North. There is the potential for a new rail station to be developed at lands between the Ballymakenny and Termonfeckin Roads along the existing rail corridor, just north of the line to be substantially upgraded under DART+ Coastal North.

The lands are serviced or serviceable with immediate capacity for thousands of homes within the next five years and with thousands more centred around a new rail station for delivery in the medium term.

The lands comprise of a mixture of Tier 1 'Serviced' and Tier 2 'Serviceable land'. The Office of the Planning Regulator has stated in several cases that it can be appropriate, in the interests of supporting compact growth and sequential development, to zone both serviced and serviceable lands within the plan period, to ensure a sufficient quantity and flexible landbank of zoned housing lands to meet housing growth requirements. Examples are provided. The lands would fall into both the Tier 1 and Tier 2 category.

Roads and footpaths

Details are provided regarding delivery of PANCR. The Council are currently seeking funding for the section which would provide for an underpass under the Dublin to Belfast Railway line.

Foul drainage network

Details are provided regarding the North Drogheda Trunk Foul Sewer Drainage project. There will be sufficient capacity to cater for those lands east of the railway. The foul water pumping station will have spare capacity for about 1000 units. Lands east of the railway line can be catered for in the existing foul sewer network. The existing drainage infrastructure serving the lands to the west of the railway line have some spare capacity (possibly up to 1,000 units).

Water supply network

A new large diameter watermain has recently been installed as part of the PANCR Phase 1. Phase 2 of the PANCR is due to commence shortly which will see a further section of the watermain installed from Termonfeckin Road back to Aston Village. New and existing water supply infrastructure is available to service the subject lands.

No Other Significant Challenges or Impediments to Housing Development

No legal challenges or impediments are envisaged.

Chief Executive Opinion on Issues raised:

The Chief Executive acknowledges the benefits of a new rail station in the north Drogheda area to serve the growing population in this part of the town. As part of the Draft Plan policy objectives will be included supporting engagement and consultation with relevant stakeholders including Iarnród Éireann, the Department of Transport, and the National Transport Authority to examine the feasibility and progressing proposals for a



train station in the North Drogheda Area. The references to the DART+ Coastal North Project in the submission are noted. The Chief Executive also recognises the benefits of this project in improving the connectivity and frequency of train services between Drogheda and Dublin. It is noted however that the DART+ Coastal North Project as currently proposed terminates at MacBride Train Station in Drogheda. If a new train station is to be delivered in North Drogheda input and collaboration from all stakeholders in the DART+ Coastal North Project would be required in order to ensure connectivity to DART services from the North Drogheda area can be facilitated.

The references to focusing TOD around a future rail station are noted. The Draft Plan will support the implementation of the TOD and the Council will continue to work with relevant stakeholders, including government departments, in identifying appropriate sites and progressing projects on same.

The importance of having sufficient residential lands available to meet both current and future housing supply is accepted. Since the completion of Phase 1 of the PANCR in Q1 2024 has enabled the delivery of a significant quantum of housing on lands served by this road. As part of the preparation of the Draft Plan an examination of the capacity of the remaining lands available in the North Drogheda area, and the likelihood of these lands being built out will be carried out. This analysis will be carried out in the context of the housing allocation provided for Louth in the 'NPF Implementation Housing Growth Requirements' Guidelines, inclusive of headroom, and ensuring there are sufficient lands available in Drogheda to meet the housing demand in the Regional Growth Centre during the next plan period and beyond.

When zoning any additional residential land regard shall be had to the Development Plans - Guidelines for Planning Authorities (July 2022) or any updated guidelines. And any other relevant Guidelines published under Section 28 of the Planning and Development Act 2000 (as amended) including the 'NPF Implementation Housing Growth Requirements' thereby ensuring there is sufficient zoned land in Drogheda to meet the New Annual Housing Growth Requirements. In all instances the Council will facilitate the creation of a sustainable '10-minute neighbourhoods' by supporting the provision of a range of community facilities and services. As part of the assessment of the potential requirement for additional zoned lands in the North Drogheda area, one of the considerations that will be taken into account will be the capacity of the Port Access Northern Cross Route to carry additional traffic generated from the additional land use zonings and the associated impact on this additional traffic on traffic movements and junctions in the North Drogheda area.

Chief Executive Recommendation:

The Draft Plan will support the completion of the PANCR and the continued build out of the residential lands in the north Drogheda area, including associated social and community facilities and physical infrastructure to enable the development of these lands.

An examination of the potential requirement for additional lands in Drogheda (and the wider County) will be carried out, in the context of the housing allocation provided for Louth in the 'NPF Implementation Housing Growth Requirements' Guidelines, inclusive of headroom.

To include policy support in the Draft Plan to examine the feasibility of and to support the delivery of a new train station in the North Drogheda area.

To include policy support for the delivery of Transport Oriented Development Projects in the County in association with the relevant stakeholders.



Submission Ref. No:

LH-C144-DPIP-229

Submitted By:

Iarnród Éireann (Irish Rail)

Summary of Main Issues Raised:

Iarnród Éireann welcomes that the issues paper has included 'Climate Action and Energy' and 'Sustainable Movement' as key challenges.

Iarnród Éireann consider that the following high-level measures should be supported by the Development Plan:

- Priority should be given to Public Transport and Active Travel schemes.
- Continue to support the expansion of heavy rail as a high-capacity high frequency mode choice in Louth through the DART+ and Enterprise Fleet Replacement Programmes.
- Promote Transport Orientated Development (TOD).
- Support the development of projects recommended as part of the All-Island Strategic Rail Review (AISRR).
- Support ongoing investment in rail infrastructure.
- Support an integrated, user friendly, and highly connected public transport network.

Importance of long-term planning and vision in the Development Plan are outlined.

The existing Iarnród Éireann rail network plays an important role in the public transport provision in Louth. The Northern line pass through the county, providing DART and commuter rail services which connect into our Intercity rail services. Iarnród Éireann is committed, subject to funding, to further expand and integrate the railway network, in accordance with national, regional, and local policy, in collaboration with Louth County Council, the Department of Transport, and the National Transport Authority (NTA).

Implementation of the DART+ Programme

DART+, is a cornerstone project of the GDA Strategy and the Government's Project Ireland 2040 vision. DART+ is a central pillar in a future integrated sustainable transport system serving Louth and the wider Eastern Region. The submission provides details regarding changes/ upgrades to the future public transport network and information regarding peak passenger capacity and frequency of services.

The key infrastructure improvements required as part of the DART+ Coastal North project are detailed.

By leveraging the full transport capability of heavy rail, DART+ will facilitate compact, high-density, transport orientated, residential and commercial development along its corridors. DART+ is vital to sustainable future population and economic growth. It is essential that the Development Plan supports the implementation of the full DART+ Programme.

All-Island Strategic Rail Review

The All-Island Strategic Rail Review (AISRR), commissioned by the Department of Transport in Ireland and the Department for Infrastructure in Northern Ireland, provides a vision for the future of the rail network, emphasising the need for improved connectivity, increased capacity, and investment in rail infrastructure to meet future travel demands while promoting a shift towards more sustainable transport modes. Key AISRR recommendations are outlined.

Iarnród Éireann requires that consideration of the AISRR recommendations as a matter of principle in relation to proposed developments adjacent to or near rail lines. Iarnród Éireann is committed to the policy of Transport Orientated Development (TOD) which facilitates dense development in and around major public transport hubs.

Enterprise Fleet Replacement Programme

Details and key benefits of the Enterprise Fleet Replacement Programme are outlined.



Rail Freight

Advantages of rail freight are outlined, and it is stated that rail freight generates 76% less emissions (per tonne-km) than road haulage. The Iarnród Éireann Rail Freight 2040 Strategy has been developed in response to this challenge. Advantages of an expanded rail freight network are detailed. The submission outlines the aims of the Rail Freight Strategy 2040.

A freight-only line from Drogheda serves Tara Mines near Navan. The railway supports some outbound mining products from Tara Mines to Dublin Port. This route forms part of the future core freight routes proposed in the AISRR.

Iarnród Éireann believes that Louth County Council should consider the findings of Iarnród Éireann's Rail Freight 2040 Strategy and AISRR when finalising the new Development Plan.

Chief Executive Opinion on Issues raised:

The existing Iarnród Éireann rail network plays an important role in the socio-economic development of Louth. The rail network provides significant economic benefits to the economy of County Louth as it provides direct access to the labour force markets of both Belfast and Dublin.

The Chief Executive welcomes the commitment from Iarnród Éireann in their submission to further expand and integrate the railway network. It is noted however that no reference has been made to the potential investment for any new rail stations in the County or the re-opening of closed stations (Dunleer). Nonetheless the Chief Executive considers that it is prudent in the long-term growth of the County and the transition towards more sustainable modes of transport that support is provided in the Draft Plan to examine the potential feasibility for new rail stations and the progression of such projects during the life of the Plan.

The Council places climate action and sustainable movement as key challenges for County Louth and both are at the top of their planned objectives agenda. Climate action shall continue to permeate all aspects of the new Plan. The progression of the projects listed in the submission, including an increased focus on rail freight, would assist the state meet its target of achieving net-zero emissions by 2050.

Louth County Council welcomes the Iarnród Éireann priorities identified in this submission, and the active projects and programmes which are ongoing, including the DART+ Programme, Enterprise fleet replacement and the recommendations of the All-Ireland Strategic Rail Review.

As detailed in the submission DART+ will have significant benefits to rail passengers from Louth offering a higher frequency, integrated rail connections to the heart of Dublin city centre. The Draft Plan will include policy support for the progression of the DART + Coastal North Project and all associated works required to enable the delivery of this project.

One of the recommendations of the All-Ireland Strategic Rail Review is the construction of a new rail line from Drogheda to Clongriffin, with four tracking from Clongriffin to Spencer Dock. At present there is no detail in relation to the potential location of this new rail link or the quantum of lands required to be reserved to facilitate the construction of this rail line. Given the strategic importance of this rail link in improving rail connectivity between Drogheda and Dublin and along the Dublin-Belfast Economic Corridor the Chief Executive will engage with Iarnród Éireann in relation to this new rail line prior to the publication of the Draft Plan.

The projects and programmes identified in the submission will assist in the creation of sustainable communities whereby the additional public transport demand associated with the increased population can be met by the delivery of these projects thereby creating a quality public transport provision where rail travel is a viable alternative to the private car. The positive impact such rail projects can have on making the County an attractive location for economic investment is also recognised.

Chief Executive Recommendation:

To continue to work in collaboration with Iarnród Éireann and other relevant stakeholders to deliver sustainable transport projects and programmes including the DART+ Coastal North Project and include policy support for same in the Draft Plan.

To engage with Iarnród Éireann in the progression of projects listed in the All-Ireland Strategic Rail review including the recommendation for a new rail line from Drogheda to Clongriffin and include policy support for same in the Draft Plan.

To provide a chapter on Climate Action and ensure that climate action measures permeate the entire plan.

To continue to provide policy objectives including land use zoning which support the creation of sustainable communities, promoting active travel, compact growth, sustainable transport and improving connectivity between key settlements within and beyond Co. Louth.

To seek to support Iarnród Éireann's commitment to the policy of Transport Orientated Development (TOD) which facilitates dense development in and around major public transport hubs.

To encourage the expansion of modern rail freight facilities and services that can help develop an attractive alternative to road haulage, encourage modal shift from road to rail and support decarbonisation and environmental targets.

Submission Ref. No:

LH-C144-DPIP-230

Submitted By:

Kenneth D Lonergan & Associates Ltd on behalf of Assist Property Ltd

Map showing land subject to Submission:



Figure 1: Extract from Termonfeckin Zoning Map as per the LCDP 2021-2027 which illustrates the lands subject of the submission (immediately to the north of the settlement boundary of Termonfeckin).



Figure 2: Aerial image included as part of the submission which identify the full extent of the lands.

Summary of Main Issues Raised:

The submission seeks the extension of the settlement boundary of Termonfeckin to include the lands shown in Figure 2 above (c.12.2ha).

The submission sets out that they consider the lands to represent a suitable opportunity for residential development and are near existing public services and utilities.

Chief Executive Opinion on Issues raised:

The land subject of this submission is currently outside of and immediately to the north of the settlement boundary of Termonfeckin as shown in Figure 1 & 2 above and are currently zoned Rural Policy Zone 2.

In relation to the request to extend the settlement boundary of Termonfeckin, the Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing targets contained within the Core Strategy and overall growth of the settlement over the Plan period.

Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026. The submitter is advised to review the settlement boundary of Termonfeckin in the Draft Plan and to lodge a submission at this stage of the process in relation to this matter.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.



Submission Ref. No:

LH-C144-DPIP-236

Submitted By:

Department of Housing, Local Government and Heritage

Summary of Main Issues Raised:

1. Government Policy on nature conservation

A recent report on the status and trends of Ireland's bird species have shown that even with strict protection these habitats and species are continuing to deteriorate, (refer to www.npws.ie), with additional reports on Protected Habitats and Species to be published soon.

United Nations, European Union and National policies are outlined.

A County Development Plan that has biodiversity embedded in its core policies will result in a county that is a healthy place for its people and visitors. Funding for Local Authority projects that promote actions contained in the 2023-2030 National Biodiversity Action Plan (NBAP) will be available from the Local Biodiversity Action Fund (LBAF).

2. Nature Conservation within the County Development Plan (CDP)

There are positive policies set out in relation to conserving biodiversity in the Louth Biodiversity Action Plans, these should be built up and strengthened.

It is important that the CDP sets out the legislative requirements in relation to the protection of designated sites and protected species under both European (EU Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC)) and national legislation (i.e. Wildlife Act 1972-2023).

It is imperative that environmental assessments (SEA, AA, SFRA) in relation to the CDP are integrated with the plan-making process and that the precautionary principle. The Council should ensure that ecological expertise is available to it in undertaking these assessments.

The Department recommends that there is an overarching commitment in the CDP to undertake AA, EIA and EClA as required and appropriate in relation to all downstream plans and projects.

The Department encourages the Council to include as an objective in the CDP that data generated from environmental studies is made available to the National Biodiversity Data Centre (NDBC).. Reference is made to Objective 1 in the NBAP. The CDP should contain as objective to implement the National Biodiversity Action Plan.

The Department recommends that biodiversity considerations are integrated into all sections of the CDP and are considered when zoning lands. Advice from a professional ecologist early in spatial planning processes is recommended.

The Plan should avoid policies and objectives that undermine or are in direct conflict with natural heritage policies and objectives.

It is recommended that there is an objective to protect, conserve and enhance biodiversity both within and outside protected sites.

The Department would welcome the inclusion of an objective whereby all public buildings and public open spaces in the county would incorporate positive biodiversity measures as standard.

Climate Change and Biodiversity

There is growing acknowledgement that restoring and protecting nature is one of the best strategies for tackling climate change.



Reference is made to the actions in Strategic Goal 3 'Natural Environment' within Louth's Climate Action Plan 2024-2029 and it is advised that these be included in the Draft Plan.

Given the presence of several peatland areas in County Louth the Council should consider incorporating principles and actions relating to climate change mitigation and adaptation and biodiversity protection contained in the National Peatlands Strategy 2015 and the National Peatlands Strategy Mid-Term Review and Implementation Plan 2023 into the CDP.

3. Green Infrastructure

The incorporation of Green Infrastructure (GI) in spatial planning is one of the ways in which the National Biodiversity Action Plan 2023-2030 seeks to address biodiversity loss. This is also reflected in the NPF and RSES. Louth County Council should design GI strategies that function at different scales and across Local Authority boundaries.

Development upon farmlands leads to loss of flora and fauna. This can be mitigated by retention of green infrastructure such as riparian zones, trees and hedgerows.

Threats and pressures to nature conservation in the Louth County Council area

Water quality

The Boyne-Blackwater is one of the principal river systems in the County supporting several protected animal species. Much of this system has been designated as the River Boyne and River Blackwater Special Protection Area (SPA) and the River Boyne and River Blackwater Special Area of Conservation (SAC).

It is important to maintain a high-water quality and associated ecological quality. Riparian setbacks support high ecological. The Inland Fisheries Ireland Document *Planning for Watercourses in the Urban Environment* should be consulted. Specific measures to discourage culverting of water courses should also be considered. The CDP should also promote the removal of historic infilling along watercourses.

Invasive Species

Measures to control alien invasive plant species such as Japanese Knotweed, Himalayan Balsam, Giant Hogweed, Cherry Laurel and Rhododendron should be included in the CDP

Nitrogen deposition

Deposition of nitrogen originating from various sources can have ecological impacts. The impacts of nitrogen deposition on nearby nitrogen-sensitive Natura 2000 Sites or habitats outside European Sites should be considered when assessing development of energy facilities and intensive livestock units.

The Department further advises that the Appropriate Assessment of the Draft CDP should include an assessment of the impacts of nitrogen deposition on Natura 2000 Sites within the CDP's Zone of Influence. Consideration should also be given to monitoring nitrogen deposition in the Strategic Environmental Assessment. Details of nitrogen deposition mapping and impacts on habitats are included in the Department's latest Article 17 Report.

Light pollution

The Department encourages the inclusion of a Light Pollution Policy within the Development Plan 'Bats and Artificial Lighting at Night' Guidance Note 08/23 should be consulted for up-to-date guidance on minimising the effects of artificial lighting on bat species.

Development of Greenways

As advised in the National Greenway Strategy, greenways and other associated linear trails should be designed to consider, and avoid where necessary, the sensitivities of natural heritage. The Department recommends that such proposals are subject to route/site selection processes to ensure that impacts to biodiversity and nature



conservation interests are avoided. The Department also notes the need to apply the precautionary principle when screening for Appropriate Assessment (AA) and/or undertaking AA for greenways.

The East Coast Greenway has the potential to have adverse effects on flora, fauna and ecologically significant habitats. It appears the preferred route for it largely steers clear of European Sites and other ecologically sensitive habitats in Cooley. However, many ecologically sensitive areas are also present along the proposed route corridor for the East Coast Greenway. The Council should take cognisance of the Natura Impact Statement: Appropriate Assessment included in the National Cycle Network Plan

Damage and Disturbance to Coastal Protected Sites Due to Increased Recreational Usage

The growth of the population of County Louth in recent years, together with increased appreciation of the outdoors, led to increased human and canine usage of coastal SACs and SPAs, with resultant detrimental impacts. Consideration of such impacts will be necessary in the future when AA is undertaken in relation to residential development, infrastructural projects, greenways and other pedestrian and cycling facilities. The new Plan should also provide for the management of coastal SACs and SPAs and other ecologically valuable coastal habitats, to mitigate the negative impacts of their increased use for recreation.

4. Monitoring the impacts of the County Development Plan on biodiversity

The Development Plan will be subject to environmental assessments, and the Department would advise that particular attention should be paid to the requirements of Article 10 of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC, whereby Member States are required to monitor the significant environmental effects of the implementation of plans. Monitoring during plan implementation should allow for corrective action and intervention if environmental damage is noted and will provide a learning opportunity.

The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report. The Department would also welcome the publication of Strategic Environmental Reports, and other biodiversity plans or reports (such as the results of ecological surveys) on the Council's website.

Chief Executive Opinion on Issues raised:

The Chief Executive welcome the comments and guidance from the Department in relation to nature conservation and recognises the importance of our natural environment and the need to safeguard and protect it from negative factors. Our natural environment not only provides biodiverse habitats for plants and species but provides a valuable resource to our own health and wellbeing. The current LCDP 2021-2027 includes a dedicated chapter regarding the natural environment, with specific narrative, policy objectives, zonings, and a suite of environmental reports which seek to protect and enhance our natural environment. The above comments, guidance, legislation and sources are of great benefit to the Council and will be used to inform the drafting of the new Plan. The Council will seek to implement this range of information and recommendations as key sources within the new Plan.

Chief Executive Recommendation:

Ensure there is a strong emphasis in both the narrative and policy objectives in the Draft Plan in relation to nature conservation, biodiversity enhancement, and climate change.



Submission Ref. No: LH-C144-DPIP-238

Submitted By: Dundalk Chamber

Summary of Main Issues Raised:

Concern over the discharge of wastewater into Dundalk Bay.

Recognise the need for services and facilities to be delivered in tandem with housing developments.

Recommends a collaborative approach between Enterprise Ireland, IDA and local builders to ensure the needs of all businesses are met from FDI to micro/shared office accommodation.

Suggests a railway station is required north of the river in Drogheda and that the Port Access Northern Cross Road becomes the main artery.

Recognises the opportunities of both the Living City for Dundalk and Drogheda and the Queen's University and Dundalk Institute of Technology (DkIT) merger whilst also noting that the infrastructure is required in advance.

Chief Executive Opinion on Issues raised:

The Chief Executive notes the environmental concerns surrounding Dundalk Bay. Whilst the operation of the Dundalk Wastewater Treatment Plant is the responsibility of Uisce Éireann the Council. It is noted that Uisce Éireann are undertaking works to the Treatment Plant to address issues of non-compliance operational issues. The Draft Plan will support the protection and enhancement of designated sites including Dundalk Bay and will include policy objectives relating to same.

The need for services and facilities to be planned and developed in tandem with housing development is a key objective in creating sustainable communities. As part of the build out of large parcels of land, the Draft Plan will seek to ensure that developments are phased in a way that social and community facilities are delivered in tandem with residential development.

In maximising the economic potential of Dundalk and the wider County it is recognised that it is critical there is a sufficient land bank of employment generating lands available to meet the needs of a range of business sectors.

The provision of rail services falls under the remit of Iarnród Éireann however, the Chief Executive recognises the benefits of a train station in north Drogheda to serve the population in this part of the town and the wider catchment. The Draft Plan will include policy support to enhance rail infrastructure in the County, the delivery of which would assist will be seeking in increasing the modal shift to more sustainable transport. This includes an additional rail station in north Drogheda.

The collaboration between Queen's University and the Dundalk Institute of Technology strengthens cross-border ties and the Dublin-Belfast Economic Corridor, which is a key strategy under the Louth County Development Plan, so Louth County Council would be looking at ways on how it can further enhance these connections through policy and to ensure that adequate infrastructure is in place.

Chief Executive Recommendation:

To include a narrative and policy framework in the Draft Plan that seeks to maximise the strategic location of Louth, protect the local environment, deliver improved services and amenities, and support investment in social and physical infrastructure including education, water services, and transport infrastructure including the provision of a train station in north Drogheda.



Submission Ref. No: LH-C144-DPIP-239

Submitted By: Downey Planning

Summary of Main Issues Raised:

The submission relates to the Community, Recreation, Amenity & Social Inclusion theme of the Issues Paper and sets out the following points:

There is continued population growth in the County and specifically in Dundalk and it is important to ensure sufficient levels of recreational facilities are provided to meet the needs of the growing population. There has also been increased female participation in sports clubs, which is very welcome, however the population growth and increased female participation is adding demand to already limited resources.

There is a vast amount of underutilised land in the ownership of control of the Local Authority which could be better utilised for sports and recreation purposes. The submitter understands that the Council are preparing an audit of their land, and it is important to engage with stakeholders who could provide advice and guidance as to the needs in the area and how lands could be better utilised. E.g. community playing pitches could be provided and made available to a number of clubs rather than individual clubs trying to compete to pitches additional lands with often limited financial resources. This is an approach taken in the Dublin area.

Ensure sufficient policies and objectives are provided within the Development Plan to protect and support the future needs of sporting clubs and facilities and that the local authority work closely with them to improve the facilities.

Chief Executive Opinion on Issues raised:

The importance of community, recreation and sports facilities and the pressure on existing clubs arising from growing population numbers and overall increased participation is acknowledged. A Social Infrastructure Audit was prepared for Dundalk as part of the preparation of the 2025-2031 Local Area Plan for the town; this will also inform the new County Development Plan. An analysis of all land use zonings will also be carried out in the preparation of the new Plan, and the Council will investigate the possibility of zoning additional lands 'G1 Community Facilities' or 'H1 Open Space' where a need is identified.

Policy Objectives will be prepared to ensure support for community and recreation facilities to enable them to continue to operate and grow and in a sustainable manner.

Chief Executive Recommendation:

Carry out a review of all land use zonings and if considered necessary additional land will be zoned for recreation and/or community purposes.

The Policy Objectives contained in the new Plan will continue to support the provision of community and recreation facilities.



Submission Ref. No:

LH-C144-DPIP-240

Submitted By:

Clr Marianne Butler

Summary of Main Issues Raised:

The submission is set out under the following headings:

Wind Energy

New developments need to make provision for the construction and servicing of planned offshore wind farms.

There is a need to ensure that ports and harbours will be able to benefit from opportunities in this section and that Louth benefits from clean energy sources.

Greenways

Our towns and villages should have connections to planned greenways and trailhead facilities.

Dundalk Port

The Council owns a significant piece of land in Dundalk Port and will eventually take over the assets of the port company. A masterplan is needed to plan how this area will be developed to benefit the people of Dundalk and Louth in the future.

Provision of Tourism Facilities

The Plan should include objectives encouraging the development of facilities for slow tourism, specifically campervans (publicly and privately owned).

Town Centre First

The redevelopment of key sites in our towns and villages is needed to be supported and encouraged, specifically long-term vacant sites such as Carroll Village.

Public Transport

Engage with public transport providers to develop a transport hub that connects public transport services. In Dundalk there are several locations for bus services:

- Roden Place – Halpenny’s services
- Long Walk Bus Station - Bus Éireann/Expressway/Local Link
- Marshes Shopping Centre – Matthews Coaches

Forests/Tree Cover

More Tree Preservation Orders and Trees and Woodlands of Special Amenity Value designations are required to preserve native mature trees. The Plan should encourage natural and diverse forestry in suitable locations to make Louth more climate resilient and to allow and to encourage habitats to be rewilded.

Housing

The Plan should support housing over shops and the conversion of suitable buildings (previously used for commercial purposes) to residential use and identify and encourage development on suitable infill and brownfield sites to ensure compact growth of our communities.

Active Travel

The Plan should support the development of bike share schemes in our towns and villages.



Chief Executive Opinion on Issues raised:

Wind Energy

The Draft Plan will support national targets in relation to electricity generation from renewable sources and will support renewable energy projects subject to compliance with the relevant planning and environmental criteria and considerations.

The opportunities for ports and harbours to be utilised by offshore wind companies in the operation and maintenance of potential future wind farms off the east coast of the County will be recognised in the Draft Plan.

Greenways

The Chief Executive recognises the importance of greenways as a valuable recreational amenity that promotes an active and healthy lifestyle as well as being an important tourism asset.

The National Cycle Network Plan and the NTA Cycle Connects Plan identify an overarching objective to develop active travel facilities in urban area and connect these urban areas through a network of greenways. This National Cycle Plan will create safe, accessible, and convenient cycling routes, connecting more people to more places.

In County Louth it is the Council's Strategic Objective to 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 and public roads in the County.

The Draft Plan will continue to support the progression of Greenway projects in the County and will support the provision of trailheads and trailhead facilities in appropriate locations.

Dundalk Port

Dundalk Port is designated as a Key Development Area in the Dundalk LAP and its importance as both an economic asset and the development opportunity of the land is recognised. The potential of the regeneration of the area is recognised in Regional Policy Objective 4.23 of the RSES, and the location of lands make them suitable for a range of uses including residential, employment and tourism related uses.

The Draft Plan will support the current use of the port facility and operations. It will also support the redevelopment of these lands and preparation of a masterplan at such times as the port-related activities on site were to cease or relocate.

Provision of Tourism facilities

The Chief Executive recognises the importance of tourism to the County and the provision and availability of tourism facilities including those required for campervans. A Tourism Strategy is currently being prepared for County Louth, and the Draft Plan will support the provision of tourism facilities at appropriate locations in line with this strategy.

Town Centre First

The Chief Executive recognises the importance of redeveloping key sites and regeneration in our towns and villages.

The Dundalk LAP identified several Key Development Areas such as the Long Walk Quarter which includes the lands at the former Carroll Village Shopping Centre. The Dundalk LAP will inform the Draft Plan in so far as it relates to Dundalk and all other settlements will be reviewed as part of the Draft Plan; support will be provided to encourage regeneration. As part of the Government's Town Centre First Strategy, several initiatives and schemes have been implemented to assist in regenerating town centres and bringing vacant buildings back into use. Whilst the management and implementation of these initiatives is outside the remit of the County



Development Plan, support will be provided for them in the policy framework of the Plan.

Public Transport

The importance of transport hubs that connect public transport services is recognised and the Draft Plan will support the delivery of such projects and shared mobility hubs at suitable locations.

The submission set out concerns in relation to the number of locations of transport services in Dundalk. A Transport Plan was carried out for Dundalk as part of the Dundalk LAP which identified bus station improvements at the Long walk (Transport Measure Option ID 21) and furthermore, the Dundalk LAP identified a Key Character Area (No. 4 The Station Quarter) which identified the potential to create a distinct and unique transport hub. The Dundalk LAP and associated Transport Plan will be incorporated into the Draft Plan.

Louth County Council will continue to actively engage with relevant stakeholders in relation to such matters.

Forests/Tree Cover

Trees, woodlands and hedgerows contribute to the county's landscape setting, biodiversity, environmental, amenity and natural heritage value. A review of Trees and Woodlands of Special Amenity Value will be undertaken during the preparation of the Draft Plan, and the Plan will support their protection.

In relation to the request in the submission to make more Tree Preservation Orders, this is carried out under a separate section of the Planning and Development Act 2000 (Part XIII, Section 205) and is a separate process to the preparation of the Development Plan.

Housing

The Government's Town Centre First Strategy provides for several initiatives and schemes to assist in regeneration and includes the introduction of planning exemptions for the conversion of certain types of vacant commercial property into residential use and a Vacant Property Grant that provides a grant for the refurbishment of vacant properties into residential use. The Draft Plan will support the reuse of existing buildings and the compact growth of settlements in line with national and regional policy.

Active Travel

The Draft Plan will support active travel measures including the provision of Cycle Share Schemes. A Local Transport Plan was prepared for Dundalk as part of the preparation of the 2025-2031 Local Area Plan for the town which identified a number of active travel measures for cycling (No. 41: Cycle Share Scheme and No. 51: Additional Cycle Parking). The design of such schemes will be detailed within any future Part 8 applications. A Transport Plan is also being prepared for Drogheda and any other active travel measures or infrastructure for other settlements will be considered as part of the preparation of the Draft Plan.

Chief Executive Recommendation:

To support the progression and implementation of renewable energy projects in the County and associated operation and maintenance facilities relating to same.

To include policies supporting the implementation of the Climate Action Plan and the generation of electricity from renewable energy and to include within the Development Management in relation to same.

To support for the delivery of the Greenway Projects in the County in the Draft County Development Plan 2027-2033 and to review all policy objectives relating to Greenways.

To support the provision of trailheads and trailhead facilities in appropriate locations.

To continue to support the existing use of Dundalk Port and to support any future regeneration/redevelopment of these lands and the preparation and implementation of a masterplan in line with the Dundalk LAP.



To provide policy support for tourism offerings and provision of required facilities in line with the Tourism Strategy for the county.

To examine and support the reuse of key sites in the county and the redevelopment and regeneration of vacant buildings and lands for residential and other suitable uses in line with the Town Centre First Strategy and the requirements for compact growth.

To examine and support the provision of improved transport hubs at appropriate locations in line with Transport Plans.

To review the designated Trees and Woodlands and to support the protection of the natural heritage of the county.

To encourage a modal shift towards more active travel modes of transport and to provide policy support to active travel protects.

Submission Ref. No: LH-C144-DPIP-241

Submitted By: Damian Duff

Summary of Main Issues Raised:

The centre of Louth Village has been built up with private houses. Unfortunately, there is a shortage of commercial development and car parking, it also lacks a filling station.

There should be no more housing units to the southeast of the village on the Green Road. The Green Road laneway has always been a peaceful and safe lane way for walking and used by many children as a safer route.

The submission states that they would like to see much more private residential housing units as well as apartments built to the rear of Chapel View estate. These lands are more suitable for development as surface water could be disposed into the wet land areas.

Chief Executive Opinion on Issues raised:

The current County Plan provides a written statement for all Level 3 settlements including Louth Village. This provides an analysis of existing facilities and identifies opportunities to improve connectivity throughout the village; this shall be updated as part of the review process.

The Draft Plan will review the development capacity of existing settlements to determine if additional lands are required to meet the housing requirements contained within the Core Strategy. Any amendments to land use zonings within the settlements will form part of the documentation of the Draft Development Plan.

Chief Executive Recommendation:

To review and update the written statement for Louth Village having regard to, inter alia, existing facilities, movement and availability of lands for housing in accordance the Core Strategy of the Draft Plan.



Submission Ref. No:

LH-C144-DPIP-242

Submitted By:

Office of Public Works (OPW)

Summary of Main Issues Raised:

This submission is made specifically regarding the Heritage Services portfolio.

The Office of Public Works has responsibility for the care, operation and maintenance of all National Monuments in State care. The principal objective is to protect, conserve, maintain and present these sites and to facilitate appropriate public access where possible. OPW works in partnership with the National Monuments Service at the Department of Housing, Local Government and Heritage (DHLGH).

OPW Heritage Services requests the following observations to be considered with reference to the key questions raised under the heading of Core Strategy:

Population Growth and Housing

Protecting the Battle of the Boyne site, within and outside Oldbridge Demesne and Brú na Bóinne World Heritage Property from visual impact relating to new housing.

Carefully managing development on the western side of Drogheda urban area to avoid reducing the cultural heritage value of these internationally designated places.

Recognising the State's obligations under the World Heritage Convention.

Sustainable Movement

The OPW welcomes dialogue with Louth County Council on reducing dependency of private vehicles to visit OPW management heritage sites.

Energy

The OPW acknowledges built cultural heritage as a finite resource and the views from special heritage locations are considered worthy of protection.

The OPW encourages Louth County Council to balance the means of decarbonisation of the grid with the potential impact on the setting of such heritage sites and in particular views to and from these sites.

The OPW requests that Louth County Council take into consideration the above observations raised in this letter regarding the Issues Paper for the Louth County Draft Development Plan 2027 – 2033.

Chief Executive Opinion on Issues raised:

Population Growth and Housing

The Plan, through its rural landscape planning policies seeks to manage population growth of Drogheda and its environs in a manner that recognises and protects the UNESCO World Heritage Site – Brú na Bóinne which is one of the world's most important archaeological landscapes, and Europe's largest and most important concentration of prehistoric megalithic art.

The Council will work in co-operation with the OPW to further refine its policies and to ensure that inappropriate housing/industry/agricultural development within and around Drogheda does not reduce the cultural heritage value of the UNESCO World Heritage Site – Brú na Bóinne Brú.

Sustainable Movement:

The Council will engage with all relevant agencies to reduce car dependency and to promote car sharing as well



as public transport initiatives. The Council will also engage with all relevant statutory bodies including the OPW to prepare a framework plan for the protection, development, management of the UNESCO World Heritage Site of Brú na Bóinne.

Energy

The Chief Executive recognises that the protection of the World Heritage Sites requires careful management and policy controls to be in place to safeguard the setting of these internationally important sites. The Council will work in partnership with Meath County Council, relevant agencies and the public to promote, understand, conserve and sustainably manage the UNESCO World Heritage Site of Brú na Bóinne and to maintain its Outstanding Universal Value (OUV).

Chief Executive Recommendation:

To work in partnership with Meath County Council, relevant agencies and the public to promote, understand, conserve and sustainably manage the UNESCO World Heritage Site of Brú na Bóinne to maintain its Outstanding Universal Value.

To ensure no development which might have significant deleterious impacts upon the character of the World Heritage Site is permitted.

To protect the northern ridgeline which frames the views within and from the World Heritage Site of Brú na Bóinne from visually intrusive and inappropriate development.

Submission Ref. No:

LH-C144-DPIP-247

Submitted By:

Dermot Breen

Map showing land subject to Submission:



Figure 1: Google aerial image to illustrate the location of the lands subject of this submission (outline not to scale).

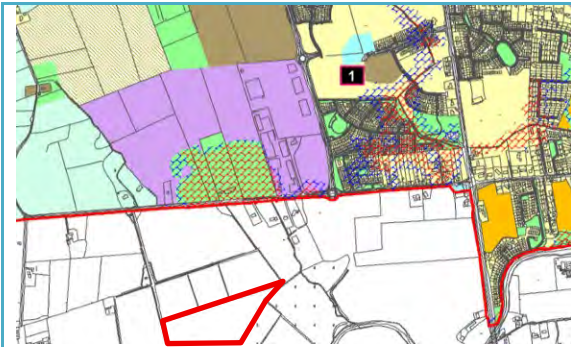


Figure 2: Extract from Dundalk Zoning map in the Louth County Development Plan 2021-2027 to illustrate the location of the lands in the context of the settlement boundary of Dundalk (Note: only a portion of the submission lands are illustrated on this zoning map)

Summary of Main Issues Raised:

The submission seeks the rezoning of approximately 8.28ha of land located at Haynestown, Co. Louth. The lands are currently zoned Rural Policy Zone 2 in the current Louth County Development Plan 2021-2027.

Chief Executive Opinion on Issues raised:

The lands are situated in the rural area some 400m outside of the settlement boundary of Dundalk. The submission requests that the lands are rezoned, however it is not clear what zoning the submission seeks to have assigned to the lands.

Notwithstanding the above, the purpose of the pre-draft consultation is to identify strategic issues that will inform the policy objectives and the development strategy for the New Plan. Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this submission at this stage.

However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted.

The submitter is advised to engage at this stage of the process and lodge this submission then and to set out what zoning they wish to have considered on the lands in question.

Chief Executive Recommendation:

N/A – Zoning submissions cannot be considered at this stage of the process.

Submission Ref. No:

LH-C144-DPIP-251

Submitted By:

John Conway

Map showing land subject to Submission:

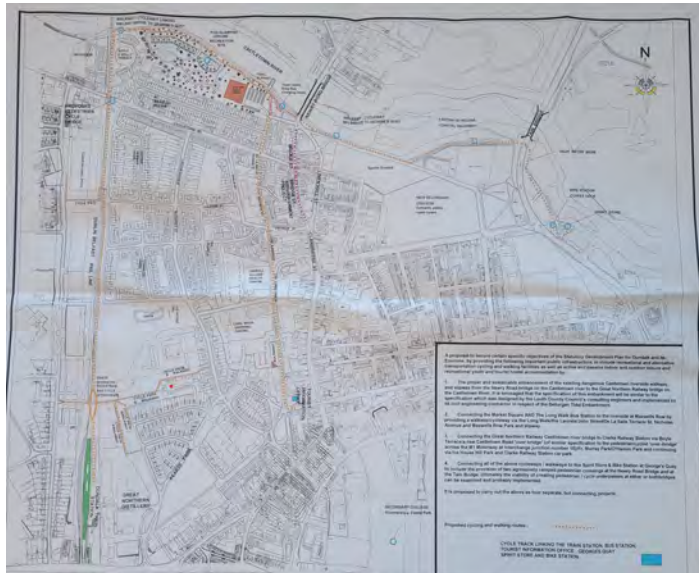


Figure 1: Map included as part of submission.

Summary of Main Issues Raised:

Request that the zonings on the relevant lands be altered to facilitate the provision of the development outlined in the attached drawing. Map contains details regarding a glamping site in the top left hand side corner.

The associated with the map submitted proposes to secure specific objectives in the Development Plan for Dundalk to provide for important public infrastructure to include recreation and cycling and walking facilities as well as passive indoor and outdoor leisure.

1. Enhancement of Castletown Riverside walkway. Specification of embankment will be like Bellurgan Tidal Embankment.
2. Connecting Market square and the land walk bus station to the riverside at Maxwells row by providing a walkway / cycle way.
3. Connecting the Great northern railway Castletown River bridge to Clarke Railway Station.
4. Connecting the above cycle/ walkways with the Spirit store and Bike station at Georges Quay. It is proposed to carry out the above as four separate but connecting projects.

Chief Executive Opinion on Issues raised:

The site identified for glamping in the submission is zoned as 'H1 Open Space' and significant parts of the submission lands are within Flood Zones A and B.

Section 11(2)(bc) of the Planning and Development Act 2000 (as amended) sets out that zoning submissions are not considered at this stage of the process. Taking this into account, the Chief Executive is precluded from commenting on this aspect of the submission. However, at the next public consultation stage, which will be towards the end of Q3 in 2026, when the Draft Plan will be published, zoning submissions will be accepted. It is



advised that a submission is made at this stage.

A Local Transport Plan has been prepared for Dundalk. Section 5 of the Local Transport Plan identifies several active travel, public transport, road and multimodal options which would support sustainable transportation in the town. The findings/recommendations within the Dundalk Local Transport Plan will inform the new County Development Plan.

Chief Executive Recommendation:

To incorporate the findings/recommendations of the Transport Plan for Dundalk into the new Plan.

Submission Ref. No:

LH-C144-DPIP-301

(refer to 215, 221, 224, 340 & 363)

Submitted By:

Paul Duff

Summary of Main Issues Raised:

As part of the County Development Plan review, I wish to highlight the importance of requiring comprehensive construction coordination frameworks in planning policy. The plan should stipulate that developers must engage proactively with all stakeholders such as TII, Irish Rail, and public utilities providers to ensure safe and efficient infrastructure delivery.

Construction traffic and heavy equipment movements can damage roads. Early engagement with TII and the Council's Infrastructure Department must therefore be a statutory condition of permission. Likewise, consultation with Irish Rail should be mandatory where works occur within 1km of any railway alignment or bridge.

Utilities such as ESB, Uisce Éireann and Eir must be included in a single co-ordinated plan to avoid service disruption, accidental strikes, or contamination issues.

Embedding these standards in the County Development Plan will ensure construction projects are delivered safely, sustainably and in full compliance with national best practice.

Chief Executive Opinion on Issues raised:

The Louth County Development Plan 2021-2027 currently requires the submission of a management plan of construction sites for any major planning application. This plan must include hours of operation, construction/phasing programme, traffic management, noise and dust mitigation measures, details of any construction lighting, and the management of construction and demolition waste.

As part of the Development Management process, a range of statutory bodies are consulted in relation to a scheme, including those within the response, who may require the attachment of conditions such as bonds for roads, keeping roads clear of debris, road management plans. The above comments have been noted and will be considered in the preparation of the Draft Plan.

Chief Executive Recommendation:

Review existing policy provision, having regard to the above submission, which will inform the development of new policy objectives and narratives.



Submission Ref. No:

LH-C144-DPIP-340

(refer to 215, 221, 224, 301 & 363)

Submitted By:

Paul Cunningham

Summary of Main Issues Raised:

As part of the County Development Plan review, I wish to highlight the importance of requiring comprehensive construction coordination frameworks in planning policy. The plan should stipulate that developers must engage proactively with all stakeholders such as TII, Irish Rail, and public utilities providers to ensure safe and efficient infrastructure delivery.

Construction traffic and heavy equipment movements can damage roads. Early engagement with TII and the Council's Infrastructure Department must therefore be a statutory condition of permission. Likewise, consultation with Irish Rail should be mandatory where works occur within 1km of any railway alignment or bridge.

Utilities such as ESB, Uisce Éireann and Eir must be included in a single co-ordinated plan to avoid service disruption, accidental strikes, or contamination issues.

Embedding these standards in the County Development Plan will ensure construction projects are delivered safely, sustainably and in full compliance with national best practice.

Chief Executive Opinion on Issues raised:

The Louth County Development Plan 2021-2027 currently requires the submission of a management plan of construction sites for any major planning application. This plan must include hours of operation, construction/phasing programme, traffic management, noise and dust mitigation measure, details of any construction lighting and the management of construction and demolition waste.

As part of the Development Management process, a range of statutory bodies are consulted in relation to a scheme, including those within the response, who may require the attachment of conditions such as bonds for roads, keeping roads clear of debris, road management plans.

The above comments have been noted and will be considered in the preparation of the Draft Plan.

Chief Executive Recommendation:

Review existing policy provision, having regard to the above submission, which will inform the development of new policy objectives and narratives.

Submission Ref. No:

LH-C144-DPIP-363

(refer to 215, 221, 224, 301 & 340)

Submitted By:

Paul Meehan

Summary of Main Issues Raised:

As part of the County Development Plan review, I wish to highlight the importance of requiring comprehensive construction coordination frameworks in planning policy. The plan should stipulate that developers must engage



proactively with all stakeholders such as TII, Irish Rail, and public utilities providers to ensure safe and efficient infrastructure delivery.

Construction traffic and heavy equipment movements can damage roads. Early engagement with TII and the Council's Infrastructure Department must therefore be a statutory condition of permission. Likewise, consultation with Irish Rail should be mandatory where works occur within 1km of any railway alignment or bridge.

Utilities such as ESB, Uisce Éireann and Eir must be included in a single co-ordinated plan to avoid service disruption, accidental strikes, or contamination issues.

Embedding these standards in the County Development Plan will ensure construction projects are delivered safely, sustainably and in full compliance with national best practice.

Chief Executive Opinion on Issues raised:

The Louth County Development Plan 2021-2027 currently requires the submission of a management plan of construction sites for any major planning application. This plan must include hours of operation, construction/phasing programme, traffic management, noise and dust mitigation measures, details of any construction lighting and the management of construction and demolition waste.

As part of the Development Management process, a range of statutory bodies are consulted in relation to a scheme, including those aforementioned within the response, who may require the attachment of conditions such as bonds for roads, keeping roads clear of debris, road management plans.

The above comments have been noted and will be considered in the preparation of the Draft Plan.

Chief Executive Recommendation:

Review existing policy provision, having regard to the above submission, which will inform the development of new policy objectives and narratives.



2.2 Summary of Issues Raised in Submissions in Relation to Dundalk to Carlingford Greenway Project and CPO concerns / Observations and Chief Executive’s Opinion and Recommendation

Submission Theme	Dundalk to Carlingford Greenway Project and CPO concerns
List of Submission References submitted in relation to CPO	
LH-C144-DPIP 8, 27, 32, 34-44 (inclusive), 46, 48, 50-52 (inclusive), 54, 57, 63, 69, 70, 73-74 (inclusive), 76-78 (inclusive), 80-82 (inclusive), 92, 98, 101, 110-111 (inclusive), 114-115(inclusive), 117-128 (inclusive), 130-133 (inclusive), 135, 137-143 (inclusive), 145-149 (inclusive), 151, 153-158 (inclusive), 160, 162, 167-169 (inclusive), 181, 187, 190, 197, 201, 206, 220, 227, 237, 243, 246, 431-463 (inclusive).	
Summary of Main Issues Raised:	
<p>Compulsory Purchase Order (CPO):</p> <p>A large number of submissions object to the use of CPOs (Compulsory Purchase Orders) to deliver non-essential infrastructure such as greenways and requests that the policy objectives referring to use of CPO’s are not included in the Draft Plan (MOV 15 of the Dundalk Local Area Plan 2025-2031 and MOV 38 of the Louth County Development Plan 2021-2027). Variation No. 3 of the County Plan 2021-2027 included additional Policy Objectives, resulting in MOV 38 being re-numbered as MOV 40.</p> <p>Local Community are against the Greenway.</p> <p>A number of submissions set out that there is no community support for the Greenway and that the Greenway is being forced upon the people. Landowners, property owners and farmers consider that the Greenway will impact upon their property rights, invade their privacy, create security and health issues and adversely impact upon their daily lives and residential properties. They strongly object to the threat of CPOs to ensure delivery of the Greenway and consider that there are enough walks / trails in the Cooley Peninsula without creating an additional Greenway. There are concerns that family farms will be fragmented and agricultural practices adversely impacted upon. There will be an increased impact upon people’s privacy, security with additional noise and littering of the countryside.</p> <p>Wildlife Impacts</p> <p>There are concerns that the Greenway would adversely impact upon local wildlife with loss of trees, hedgerows etc. Some people consider that the Greenway will destroy the local amenities and protected habitats. There are also concerns that users of the Greenway including dogs could potentially harm local livestock and there will be additional impact from nuisance and uncontrolled littering of the countryside.</p> <p>Cost Benefit Analysis:</p> <p>Numerous submissions have raised the issue about the costs associated with the Greenway and have put forward the argument, that this money would be better spent delivering essential services like schools, hospitals, housing and road and other essential infrastructure. The Cooley area has seen problems with locals being refused for one off housing in the countryside with resultant impacts on local school numbers and potential loss of teachers. Submissions state that the rural communities are under threat from the Greenway and consider enhanced tourism benefits being the key rationale behind the Greenway. People are sceptical</p>	



about the benefits of the Greenway and consider that alternative routes could have been chosen, particularly along the coast. Coastal erosion defence projects could have been utilised to deliver a Greenway without impacting upon farmland that have been in family ownership for generations.

One-off Housing

Given the restrictions on one-off housing in the rural countryside there is a need to expand development envelopes around the rural towns and villages and rural nodes to provide an alternative to one-off rural housing.

Rural farming families should be allowed to build new houses on their own land.

Other Matters:

Fix and reopen Shelling Hill Road leading to Templetown Beach. Improve coastal protection in Cooley Peninsula to avoid further coastal erosion and road damage.

Concerns regarding the condition of the main road from the Bush to Ballymascanlon. Drains on most of the roads in the Cooley peninsula are not cleaned properly with water lying on most roads after rainfall.

Additional electric car charging points should be provided.

Chief Executive Opinion on Issues raised:

Note 1: A significant number of the submissions received relating to the Dundalk Bay to Carlingford Greenway project raise issues regarding the planning and design of the project. These issues are subject to a separate consultation to the County Development Plan Review. Other submissions received propose new Greenways in other locations in County Louth.

While many of the issues raised in the submissions lie outside the scope of the Louth County Development Plan process, relevant issues will be responded to and addressed as part of the Draft Development Plan process.

Note 2: The Dundalk Local Area Plan was adopted in March 2025 and was prepared under separate legislation to the County Development Plan. Policy Objective MOV 15 contained in the Dundalk LAP cannot be amended as part of the Development Plan review.

National Context

Project Ireland 2040 which comprises the National Planning Framework (NPF) 2040 and the National Development Plan sets out the overall national objectives and includes key objectives:

- Enhanced regional accessibility strengthened rural economies communities and
- Sustainable mobility.

Greenways are specifically mentioned in the NPF as a means of achieving enhanced amenities in rural areas which would promote activity-based tourism. There is a specific national policy objective which seeks to facilitate tourism development and develop national greenways.

Local Context:

Louth County Council with the support of Transport Infrastructure Ireland are progressing in the planning and design of the Dundalk Bay to Carlingford Greenway project. The 2021-2027 County Development Plan supports the progression and delivery of this project.

The third round of public consultation on the Dundalk-Carlingford Greenway Project was ongoing at the time of writing, within which the Emerging Preferred Route Corridor has been identified. The proposed Greenway is



considered to align with National Policy and public consultation is critical to its successful implementation.

This greenway will connect to the existing Carlingford Lough Greenway facilitating a continuous cross border greenway from Dundalk in Co. Louth to Newry in Co. Down. There are other Greenway projects progressing throughout County Louth including the Louth Coastal Way, Dublin to Sligo Greenway and the Boyne Greenway which are aligned to the National Cycle Network routes as outlined in the National Cycle Network Plan and the NTA Cycle Connects plan.

Rationale for Greenways:

The Chief Executive considers that Greenways are essential pieces of infrastructure that provide a valuable recreational amenity that promotes an active and healthy lifestyle and are important tourism assets. The Council's own Corporate Plan includes Strategic Objectives that promote the delivery of Greenways and recreational facilities policies that support Strategic Economic Development programmes like tourism.

The National Cycle Network Plan and the NTA Cycle Connects plan, identify an overarching objective to develop active travel facilities in urban area and connect these urban areas through a network of greenways. This National Cycle Plan (NCP) will create safe, accessible, and convenient cycling routes, connecting more people to more places. The NCP includes proposals for cycling links in key cities and towns across counties, as well as connections between towns, villages, and settlements. It also features cycle routes such as greenways, promoting environmentally friendly travel.

In County Louth it is the Council's Strategic Objective to 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 and public roads in the County.

Greenways in County Louth:

The Draft Plan will continue to support the progression of Greenway projects in the County, taking account of the social, community, economic, and tourism benefits this infrastructure can bring to an area. It is worth noting however that any decisions relating to the route corridor for these projects, detailed design, or any land acquisition is separate to the Development Plan process.

Compulsory Purchase Orders:

This mechanism is only used as a last resort, with private land acquisition or voluntary agreements being the preferred option. Policy Objective MOV 40 in the current Development Plan states that the CPO process will only be utilised when required. Consideration will be given to the requirement to include this policy objective as part of the preparation of the Draft Plan.

Other Matters:

Concerns are raised in respect of road maintenance, cleaning or drains and repair to road damage caused by flooding is a matter for Operations Section of the Council and is outside the remit of this Draft Plan.

Concerns are raised in some submissions in relation to one-off rural housing citing that rural farming families should be allowed to build on their own land. Planning applications for rural housing are assessed on their merits through the Development Management process having regard to the planning policies and guidelines in place at the time. The qualifying criteria for rural housing policy will be reviewed having regard to national and regional policy and guidelines.

In relation to the cited need to expand settlement boundaries of rural towns and villages and rural nodes to provide an alternative to one-off rural housing, the Draft Plan will review the development capacity of all existing settlements to determine if additional lands are required to meet the anticipated growth of the settlement and housing targets contained within the Core Strategy. Any amendments to the defined boundaries of settlements or land use zonings within the settlements will form part of the documentation of the Draft



Development Plan. When the Draft Plan is published, there will be another public consultation period, which is anticipated to be towards the end of Q3 in 2026.

Chief Executive Recommendation:

To continue to provide policy support for the delivery of the Greenway Projects in the County in the Draft Plan and to review all policy objectives relating to Greenways in the 2021-2027 County Development Plan update and/or amend same as considered necessary.

To consider the requirement for carrying Policy Objective MOV 40 relating to Compulsory Purchase Orders from the current Development Plan into the Draft Plan and review this policy objective as considered necessary.

To promote walking and cycling as a safe, convenient, healthy, efficient, and environmentally friendly mode of transport for all age groups.

To encourage a modal shift from use of the private car towards more sustainable modes of transport including walking, cycling, and public transport.

To promote the further installation and expansion of charging points for electric vehicles.

To carry out a review of the existing capacity and land zoning requirements for all settlements including all rural villages and rural nodes in line with the core strategy and all relevant national and regional policy and guidance.

To review policies and objectives relating to the qualifying criteria for one-off rural housing in accordance with national and regional guidance.



2.3 Summary of Issues Raised in Submissions in Relation Large Scale Renewable Energy Projects and Environmental Concerns / Observations and Chief Executive’s Opinion and Recommendation

Submission Theme	Large Scale Renewable Projects and Environmental Concerns
List of Submission References submitted in relation to these themes	
LH-C144-DPIP 14, 22, 25, 83-86 (inclusive), 88, 91, 93-96 (inclusive), 161, 199, 200, 202-204 (inclusive), 207, 209, 211, 214, 222-223, (inclusive), 228, 231-235 (inclusive), 244-245 (inclusive), 248-250 (inclusive), 252-300 (inclusive), 302-339 (inclusive), 341-362 (inclusive), 364-430 (inclusive)	
Summary of Main Issues Raised:	
<p>A number of submissions were received which raised concerns in relation renewable energy projects and policy, rural protection and environmental matters.</p> <p>A summary of the issues raised are set out below:</p> <p>Large-scale Renewable applications</p> <p>The new Plan should provide a consolidated renewable energy strategy. The current approach to the siting of solar developments is fragmented and policy guidance should be evidence-led and map-based to ensure developments are clustered appropriately and situated away from schools, rivers and designated habitats.</p> <p>Opposed to industrial scale solar farms and battery storage facilities in rural areas and should not be in proximity to homes and schools.</p> <p>Increasing number of planning applications for large-scale renewable energy such as solar farms and the submissions consider that they are inappropriate in the open countryside and impact on residential amenity, landscape character, native wildlife and habitats and agricultural land. Public and community consultation should be undertaken in advance of applications being lodged.</p> <p>Solar development proposals often rely on redefined or downgraded road descriptions to justify unsuitable access arrangements. Public roads used daily by families and farm vehicles are repeatedly mislabelled as ‘tracks’ leading to unsafe traffic plans. The Development Plan should clearly define ‘public roads’ and ‘private access routes and link this to solar development policy so only appropriate routes are used for construction access.</p> <p>All applications for renewable energy infrastructure should include independent engineering verification of structural design, drainage, electrical layouts to prevent design flaws. The Development Plan should also include a policy for the requirement of a decommissioning bond prior to construction for any such application to guarantee the restoration of agricultural land or natural condition of the land prior to the project.</p> <p>The new Plan should include policies to ensure that compliance with preplanning advice is a prerequisite for all renewable energy and large-scale infrastructural applications.</p> <p>Landscape, Visual Amenity and Rural Character</p> <p>Large scale solar farms are an eye sore and have an impact on the rural landscape. All renewable energy and infrastructural projects should be supported by independent landscape capacity and visual impact assessments.</p>	



The new Development Plan should discourage such proposals in visually sensitive and/or scenic rural landscapes in order to preserve local character and to ensure a balanced and sustainable approach to land use.

The UK requires verified modelling of glare and noise using accredited laboratories however Ireland does not have a framework for this, leaving residents vulnerable to misjudged or ignored impacts. Louth County Council should establish planning standards based on UK guidance.

Strengthening ecological, agricultural, and hydrological policy

While the current County Plan sets out a need to protect biodiversity and green infrastructure including hedgerows there is a lack of enforceable spatial criteria. The new Plan should:

- Design ecological corridors and wildlife buffer zones linking Natura 2000 sites, wetlands and riparian habitats
- Require cumulative ecological assessments where multiple renewable energy/infrastructure projects fall within hydrological or ecological catchments
- Prohibit industrial-scale renewable projects in ecologically sensitive lowland farmlands which act as feeding/breeding grounds for wetland and farmland birds
- Cross-border environmental assessments should be required
- The Water Framework Directive (2000/60/EC) should inform all drainage and runoff policies to protect our rivers.
- Prohibit energy zoning on floodplains.

Hydrology and Flood Risk

Interaction between solar development and surface/groundwater is insufficiently regulated under current guidance.

Large scale solar complexes result in vast amounts of fencing, roadways, drainage alterations and impermeable structures which increase runoff. The new Plan should:

- Require catchment-level hydrological assessments before any renewable energy project is considered to be acceptable.
- Apply precautionary principle where water source, discharge point or cumulative runoff impact is uncertain.
- Mandate monitoring of surface water quality and groundwater levels for lifetime of project and post-decommissioning.
- Mandate flood modelling and surface water base analysis per the Water Framework Directive.
- Recognise that solar installations, especially those over 100acres, are considered significant hydrological modifiers under the Water Framework Directive and must demonstrate 'no deterioration' of waterbody status.

The Dee Catchment Flood Risk Assessment and Management (CFRAM) Study identifies significant floodplain zones that extend into Northern Ireland. Any development within the Dee Basin, including projects for renewable energy or infrastructure has potential transboundary impacts.

Protection of Farmland and Rural livelihoods

Ireland's agricultural lands are a non-renewable resource that underpin food security, local employment and economic resilience of rural communities and form part of Ireland's environmental and food infrastructure under the Common Agricultural Policy (EU Regulation 2021/2115).

Ireland's commitments under the Farm-to-Fork Strategy and the Green Deal oblige every local authority to safeguard food production capacity. The new Plan must recognise that the altering of farmland to provide for industrial solar complexes results in irreversible loss of soil function, agricultural production and community



amenity. The Plan should also emphasize the dual climate goal to reduce emissions while preserving food production capacity.

A farmland protection zoning objective should be included in the new plan to prohibit large-scale solar and energy storage on lands of agricultural value.

Support renewable energy and Ireland's transition towards sustainability however solar generation should be focused on brownfield lands, rooftop and industrial sites. Proof should be submitted that these options have been exhausted before farmland is considered for solar or Battery Energy Storage System (BESS) use.

Lessons from previous planning experience

There has been a surge of industrial-scale solar applications in Co. Louth in recent years with many exceeding 400 acres. These schemes are often located near schools, rivers and designated habitats.

There is a policy gap in relation to these applications, and the following should be considered: cumulative hydrological modelling, clarity on operational water use, landscape capacity analysis.

Applications for such applications should also consider the impact on vernacular structures and natural heritage in proximity to the site.

Strategic Policy Recommendations and Specialist Study Requirements

It should be mandatory for applications for industrial-scale solar or energy storage to submit the following prior to an application being determined:

- Comprehensive Hydrogeological Connectivity Study.
- Cumulative Catchment-Scale Water Balance and Soil Infiltration Analysis.
- Ecological Carrying-Capacity and Functional Biodiversity Study.
- Hydrological Connectivity Mapping via LiDAR and Drone-Based Topographic Modelling.
- Cumulative Noise and Low-Frequency Vibration Study.
- Soil Contamination and Leachate Risk Assessment.
- Cumulative Landscape Capacity and Visual Absorption Study.
- Decommissioning and Panel-End-of-Life Environmental Risk Study.
- Independent Landscape Capacity and Visual Impact Studies.
- School Safety Impact Assessment where proposals are near school or childcare facilities.
- Community Impact Statements and Community Engagement Reports.
- Construction Management Plans/Construction Environmental Management Plan.
- Local Economic Impact Assessment.

Regard should also be given to:

- Reviewing the existing decommissioning bond requirements for renewable energy infrastructure
- Thorough fire safety assessment including hazard identification and risk assessment (HIRA), Thermal Runaway Scenario Analysis and Local Emergency Response Plan (LERP) given the fire risks from Battery Energy Storage Systems.

Alignment with EU Law, Public Participation, and National policy

Ireland has obligations under EU and international environmental law including the Aarhus Convention, Habitats Directive, Water Framework Directive, Strategic Environmental Assessment Directive and Environmental Impact Assessment Directive. The new Plan should ensure meaningful community engagement and public participation.

The submissions highlights that the new Plan should strengthen protection for European sites.

A number of submissions set out that applications for renewable energy must comply with all relevant



legislation and guidance including: EU Ecological Law for renewable energy developments such as Habitats Directive, Birds Directive, EIA Directive, Water Framework Directive, Strategic Environmental Assessment (SEA) Directive, Renewable Energy Directive (RED III), CAP Regulation (EU) 2021/2115, EPA Soil and Land Use Policy Framework (2023), EU Road Safety Directive (2008/98/EC as amended by 2021/1187), EU Environmental Noise Directive (2002/49/EC), WHO Environmental Noise Guidelines, European Commission Solar Glare Guidance (2021), European Landscape Convention (2000), Article 39, 191 and 260 of the Treaty on the Functioning of the European Union (TFEU).

Chief Executive Opinion on Issues raised:

Solar energy applications and impact on Landscape, Visual Amenity and Rural Character

The Louth County Development Plan 2021-2027 recognises that the open countryside in Louth is a valuable resource that includes scenic landscapes and highly productive agricultural land. There has been an increase in the number of solar farm applications in the County during the life of the current Development Plan. This increase in applications is in response to a shift in national energy policy away from a reliance on fossil fuels towards maximising renewable energy potential.

The revised National Planning Framework, published in April 2025 sets out a government target to achieving 8GW of solar energy by 2030. The NPF also recognises that rural areas across the country will have an important role to play in securing a sustainable renewable energy supply. To assist in achieving this renewable energy target National Policy Objective 74 requires the Regional Assemblies to identify a renewable electricity capacity allocation for each Local Authority, with National Policy Objective 75 requiring the County Development Plans to plan for the delivery of these allocations. The total allocation in the Eastern and Midlands Region is 3,294MW. At the time of writing this allocation had not been distributed by the Regional Assembly, however when drafting the County Development Plan, the Chief Executive must be cognisant of the requirement for the Draft Plan to be consistent with national and regional policy. Accordingly, the Plan will seek to include policy support for renewable energy developments, including solar energy, in appropriate locations in the County.

Section 13.18.2 in the 2021-2027 CDP sets out guidance as to how solar energy developments in the County are assessed. This includes the following criteria:

- The Landscape Character Area in which the site is located.
- Any environmental sensitivities in the landscape.
- Site contours and levels.
- Site suitability: Brownfield lands or poor agricultural lands.
- Visual impact.
- Ecology.
- Heritage.
- Glint and glare.
- Ground maintenance, soil stripping, storage and maintenance.
- Fencing, security and lighting.
- Drainage; and
- Decommissioning

All of the above planning matters are considered as part of the assessment of planning applications for renewable energy developments. This includes the visual impact, impact on built heritage (vernacular buildings, protected structures), traffic and potential impact on road network, design details, grid connections, requirement of Appropriate Assessment and Environment Impact Assessment Reports.

This guidance is considered to be robust and results in a detailed assessment of applications for solar energy developments being made. It will be reviewed as part of the preparation of the Draft Plan and updated where



considered necessary.

In relation to concerns regarding preplanning advice and requesting that compliance with preplanning advice should be a prerequisite for all renewable energy and large-scale infrastructural applications, preplanning advice is undertaken under Section 247 of the Planning and Development Act 2000 (as amended). The purpose of preplanning consultation is to advise of the procedures involved in the consideration of a planning application including any requirements of the relevant regulation or policy objectives that may have a bearing on the decision of the planning authority. There is no provision in the Act to require that applicants comply with preplanning advice. Preplanning advice provided does not prejudice any future planning application which would be assessed on its merits having regard to the policy objectives in place at the time of the application.

Strengthening ecological, agricultural, and hydrological policy

The Chief Executive does not agree with the statement in the submission that the current Development Plan lacks enforceable spatial criteria relating to ecology and hydrology.

There is a strong policy framework in the Plan supporting the protection and conservation of European and other biodiversity sites. Whilst the primary emphasis is on the European Sites, consideration is also given to any potential impacts on non-designated sites.

With regards to ecological corridors, there is a policy objective in the current Plan a setback of at least 10 metres of any development from the banks of a river, stream, or watercourse (IU 25). Hedgerows are also recognised as important wildlife corridors. Taking this into account it is considered there is sufficient policy provision in the current Plan to ensure the protection of wildlife and ecological corridors.

The request to prohibit industrial scale renewable projects in ecologically sensitive location is noted. It is acknowledged that a balance is required in avoid habitat loss and fragmentation of breeding grounds for wildlife. In this regard the guidance for solar projects in the Draft Plan will be updated to ensure best practice techniques are employed in the design and site selection of such projects that will enhance biodiversity and wildlife in such sites.

Hydrology and Flood Risk

With regards to flood risk and hydrology it is considered that these are issues that can be dealt with in the Development Management process. Currently Sustainable Drainage Practices are a required to be demonstrated for any solar farm development whereby any surface water runoff should mimic that of a greenfield site. Such practices ensure that subject lands will not result in flooding and the development would not result in flooding of surrounding lands.

The guidance for solar farm developments will be updated in the Draft Plan to provide reference of the requirement for a drainage impact assessment and Flood Risk Assessment to be carried out to ensure impacts of a solar farm on local hydrology and potential transboundary impacts within cross-border catchments can be fully assessed.

Protection of Farmland and Rural livelihoods

It is recognised that much of the farmland in County Louth is high quality productive farmland. The challenges farmers and food producers have faced in recent years is also recognised and, in this regard, it is considered important that the Draft Plan facilitates for agricultural diversification. Taking this into account it is considered that the merits of solar farm developments be considered on a case-by-case basis with a strong set of guidance parameters setting out the criteria which such proposals would be assessed against rather than identifying specific locations in the County where they are and are not permissible.

Lessons from previous planning experience

As indicated earlier in this response, there has been an increase in the number of planning applications for solar



farms in County Louth during the life of the Development Plan and in this regard it is considered that the guidance in the Draft Plan should be updated to require an assessment of the cumulative impact of such proposals with solar farms in the surrounding area currently under consideration or have been granted permission.

Strategic Policy Recommendations and Specialist Study Requirements

It is requested that the Development Plan includes a requirement for industrial scale solar or energy storage facilities to include a range of independent, specialist technical studies relating to hydrological connectivity and cumulative impacts, an ecological carrying capacity and biodiversity study, a noise and low frequency vibration study, soil contamination study, cumulative landscape and visual assessment, decommissioning and panel end of life environmental risk study.

The 2021-2027 County Development Plan requires a range of evidence-based studies and environmental analysis to be carried out as part of a planning application for a solar farm development. Indeed, all applications for solar farm developments are thoroughly assessed to consider the potential impacts on the receiving environment including hydrology, biodiversity, noise/residential amenity, glint and glare, visual impact, and decommissioning. This guidance will be reviewed as part of the preparation of the Draft Plan and will be updated where considered necessary.

Alignment with EU Law, Public Participation, and National policy

The Chief Executive recognises the importance of public participation in the Development Plan process and the legislative requirements of the Plan to accord with National policy and National and European legislation.

A number of public consultation opportunities will be available during the Development Plan review process for members of the public to have their say in relation to the new Plan for the County and to raise concerns in relation to particular matters.

In relation to public consultation with communities in relation to planning applications, while it would be useful, there is no provision in the Planning & Development Act 2000 for applicants to undertake public consultation in advance of lodging a planning application. It is often the case on the larger renewable energy development proposals that the developers engage with the local community prior to lodging an application. There is statutory 5-week consultation period (or 8-weeks where an NIS is required) for planning applications during which members of the public can view the application documentation and anyone has the right to make a submission.

With regards to ensuring planning applications comply with EU Law and all referenced legislation and guidance, it is considered that these are issues that can be dealt with in the Development Management process.

Chief Executive Recommendation:

To promote renewable energy use and generation at appropriate locations to meet national objectives towards achieving a climate neutral economy by 2050.

To review and update the guidance contained within the current Louth County Development Plan in relation to onshore renewable energy developments including solar farm developments and the cumulative impact of such developments.

To ensure that guidance and associated policy objectives in relation to onshore renewable energy are consistent with national and regional guidance including national targets contained within the NPF and renewable energy strategies where available.



Appendices



Appendix 1 – Newspaper Notice

LOUTH COUNTY COUNCIL



PLANNING & DEVELOPMENT ACTS 2000 (AS AMENDED)
PLANNING & DEVELOPMENT REGULATIONS 2001 (AS AMENDED)
PLANNING AND DEVELOPMENT (STRATEGIC ENVIRONMENTAL ASSESSMENT)
REGULATIONS, 2004 (AS AMENDED)

Notice of Intention to review the Louth County Development Plan 2021-2027 and to prepare a new Louth County Development Plan 2027-2033

Notice is hereby given pursuant to Section 11(1) of the Planning & Development Act 2000 (as amended) of the intention of Louth County Council to commence its review of the existing Louth County Development Plan 2021-2027 and to prepare a new Louth County Development Plan for the period 2027-2033.

The preparation of the new County Development Plan shall be strategic in nature for the purposes of developing objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the Development Plan and the Core Strategy.

Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

The Planning Authority will carry out a Strategic Environmental Assessment (SEA) as part of the review process, pursuant to Article 13B of the Planning and Development (SEA) Regulations 2004 (S.I. No. 436 of 2004), as amended by the Planning and Development (SEA) (Amendment) Regulations 2011 (S.I. No. 201 of 2011).

For this purpose, the Planning Authority will prepare an environmental report of the likely significant effects on the environment of implementing the new plan. The provisions of Articles 13C to 13J of the SEA Regulations (as amended) shall apply while undertaking the SEA. Stage One Appropriate Assessment (AA) Screening (and Stage Two AA, if required), pursuant to Article 6 of the Habitats Directive 92/43/EEC and the Planning and Development Act 2000 (as amended), and Strategic Flood Risk Assessment, in compliance with “The Planning System and Flood Risk Management Guidelines for Planning Authorities” (2009), will also be carried out as part of the review process.

Public Consultation & Strategic Issues Paper

Members of the public are invited to make submissions/observations during the public consultation period for the review of the Louth County Development Plan 2021-2027 and the preparation of the NEW Louth County



Development Plan 2027-2033 from **Tuesday 23rd September to 4.00pm on Friday 21st November 2025 (both days inclusive)**.

In order to stimulate debate and encourage participation in this process, a **Strategic Issues Paper** will be available for inspection to view or download during normal opening hours from **Tuesday 23rd September to 4.00pm Friday 21st November 2025 (both dates inclusive)** at the following locations:

Louth County Council, County Hall, Millennium Centre, Dundalk A91 KFW6
Louth County Council Offices, Town Hall, Crowe Street, Dundalk A91 W20C
Louth County Council Offices, Fair Street, Drogheda A92 P440
Louth County Council Offices, Fairgreen, Ardee A92 RYT2

All libraries in County Louth (Dundalk, Drogheda, Ardee, Dunleer and Carlingford) and also on our website at www.louthcoco.ie (please check your local library for opening times)

A series of public consultation meetings shall be held across the County. Here the public will have the opportunity to discuss, with Planning Officers, relevant issues relating to the Development Plan Review.

Venues, Dates & Times of Public Consultations are as follows:

Venue	Date	Time
Carlingford Library, Newry Street, Carlingford A91 N226	Tuesday 14 th October, 2025	6 pm -8pm
Dunleer Library, Station Road, Dunleer A92 DRV0	Tuesday 21 st October, 2025	6 pm -8pm
Dundalk Library, Roden Place, Dundalk A91 RC44	Wednesday 22 nd October, 2025	5pm -7.30pm
Drogheda Library, Stockwell Lane, Drogheda A92 PY20	Wednesday 5 th November, 2025	5pm -7.30pm
Ardee Library, Market Square, Ardee A92 XH22	Thursday 6 th November, 2025	5pm -7.30pm

Making a Submission

Submissions and observations in relation to the review of the Louth County Development Plan 2021-2027 and the preparation of the new Louth County Development Plan 2027-2037 are invited during the initial public consultation period, **from Tuesday 23rd September to 4.00pm on Friday 21st November 2025 (both dates inclusive)**. Submissions/Observations **must** include the name and address of the person/organisation making the submission/observation and may be made in the following ways:

- Consultation Portal: <https://consult.louthcoco.ie>,
or
- In writing to Development Plan Review, Forward Planning Unit, Town Hall, Crowe Street, Dundalk, Co Louth A91 W20C

Submissions should be clearly marked **“Development Plan Review”**. Please note that late submissions **cannot** be accepted. All such submissions lodged within the above period will be taken into consideration prior to the preparation of the Draft County Development Plan.



In respect of making a submission please note the following:

- Submissions/observations should include your name and may include address, a map (for identification purposes) and, where relevant, details of any organisation, community group or company etc., which you represent.
- Submissions/observations regarding objectives and policies to deliver an overall strategy for the proper planning and sustainable development of County Louth may be made within the specified period. Submissions/observations at this stage of the overall Plan-making process should be strategic in nature and focus on 'big picture' issues.
- Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing.
- As the overall Plan-making process advances the Planning Authority intends to review the zoning of the area of the Development Plan, for the purposes of developing objectives and policies to deliver an overall strategy for the proper planning and sustainable development of (i) the area of the Development Plan, and (ii) the Core Strategy. **Requests or proposals for the zoning of particular land, for any purpose, cannot be considered at this Pre-Draft stage of the County Development Plan.** These matters will be considered during the Draft Plan stage of the overall process.
- Please be advised that all submissions received will be published online in accordance with the requirements of the Planning and Development Act 2000, as amended, and will be summarised in the Chief Executive's Report, which will be published. You should ensure that no vexatious, libellous or confidential information, including confidential information relating to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure) is included in your submission. The Planning Authority reserves the right to redact any submission or part thereof that does not comply with this requirement. Please be advised that the submission will be published in full.
- Please make your submission by one medium **only** i.e. in writing or online. This will avoid the duplication of submission reference numbers and will streamline the process.
- Louth County Council is subject to the provisions of the Freedom of Information (FOI) Act (as amended). If you consider that any of the information supplied by you is either commercially sensitive or confidential in nature, this should be highlighted and the reasons for its sensitivity specified. In such cases, the relevant material will, in response to FOI requests, be examined in light of exemptions provided for in the FOI Act.
- Louth County Council is subject to the provisions of the Data Protection Act (as amended) and General Data Protection Regulation (GDPR). In order to assist us in complying with Data Protection and GDPR **please include your name and contact details on a separate sheet** to the content of your submission/observation.

THOMAS MCEVOY
DIRECTOR OF SERVICES
LOUTH COUNTY COUNCIL

Dated 23rd September 2025



Appendix 2 – List of Submissions Received

A total of 463 submissions were received by Louth County Council in relation to the Strategic Issues Paper for the Pre-Draft Stage of the Louth County Development Plan 2027-2033, as detailed in Table 1 hereunder:

Table No.1 List of submissions Received

Submission Reference	Name	Page on CE Report
LH-C144-DPIP-1	Paul Gilgunn	9
LH-C144-DPIP-2	Health and Safety Authority (HSA)	10
LH-C144-DPIP-3	ClIr Dolores Minogue	11
LH-C144-DPIP-4	ClIr Shane McGuinness	11
LH-C144-DPIP-5	Eoin Reid	12
LH-C144-DPIP-6	ClIr Shane McGuinness	14
LH-C144-DPIP-7	ClIr Shane McGuinness	15
LH-C144-DPIP-8	Lisa Finnegan	282
LH-C144-DPIP-9	Keith Ludlow Architects on behalf of Des Gaffney	16
LH-C144-DPIP-10	ClIr Shane McGuinness	17
LH-C144-DPIP-11	Tony Lennon on behalf of Dundalk Cycling Alliance	18
LH-C144-DPIP-12	Drogheda Port Company	19
LH-C144-DPIP-13	John Woods	22
LH-C144-DPIP-14	Dromin and District Residents Association	286
LH-C144-DPIP-15	Aidan Geraghty on behalf of Patrick Mongey	23
LH-C144-DPIP-16	Alan Lynch	24
LH-C144-DPIP-17	ClIr Shane McGuinness on behalf of Blackrock and Haggardstown Tidy Towns and visitblackrock.ie	25
LH-C144-DPIP-18	Helen Byrne	30
LH-C144-DPIP-19	Housing Infrastructure Services Company (HISCo)	31
LH-C144-DPIP-20	Alan Lynch	32
LH-C144-DPIP-21	Declan Mallon	33
LH-C144-DPIP-22	Daniel & Celine McGahon	286
LH-C144-DPIP-23	Michael Byrne & Maureen Kennedy-Byrne	38



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-24	Eastern and Midlands Regional Assembly (EMRA)	39
LH-C144-DPIP-25	Ryan Murray	286
LH-C144-DPIP-26	Office of Public Works (OPW)	52
LH-C144-DPIP-27	Protect Cooley Peninsula	282
LH-C144-DPIP-28	Steven Peck Chartered Town Planner on behalf Leamai Properties Limited	56
LH-C144-DPIP-29	Gillian Hoey	60
LH-C144-DPIP-30	A F	61
LH-C144-DPIP-31	Neal Myles	62
LH-C144-DPIP-32	Cormac Gormley	283
LH-C144-DPIP-33	Uisce Éireann	63
LH-C144-DPIP-34	Marguerite Gormley	282
LH-C144-DPIP-35	Darragh Weir	282
LH-C144-DPIP-36	Claire Savage	282
LH-C144-DPIP-37	Annie Rogers	282
LH-C144-DPIP-38	Seamus Savage	282
LH-C144-DPIP-39	Ellen Savage	282
LH-C144-DPIP-40	Michael Hanlon	282
LH-C144-DPIP-41	Tara Dunne	282
LH-C144-DPIP-42	Siobhan Dunne	282
LH-C144-DPIP-43	Denise Collins	282
LH-C144-DPIP-44	Shaun Cumiskey	282
LH-C144-DPIP-45	Department of Education and Youth	66
LH-C144-DPIP-46	Bridie Maguire	282
LH-C144-DPIP-47	The Land Development Agency (LDA)	67
LH-C144-DPIP-48	Vivienne Mee	282
LH-C144-DPIP-49	Maureen Lowe	69
LH-C144-DPIP-50	Aisling McKeon	282
LH-C144-DPIP-51	Brendan Rafferty	282
LH-C144-DPIP-52	Kathleen O'Keefe	282
LH-C144-DPIP-53	Gareth Kyle on behalf of Boyne Valley	70



Submission Reference	Name	Page on CE Report
	Consultative Committee	
LH-C144-DPIP-54	Martina Rafferty	282
LH-C144-DPIP-55	RMLA Planning Consultants on behalf of An Post	71
LH-C144-DPIP-56	Drogheda and District Chamber	72
LH-C144-DPIP-57	Breege Cumiskey	282
LH-C144-DPIP-58	Liam Kieran	75
LH-C144-DPIP-59	Newry, Mourne and Down District Council	777
LH-C144-DPIP-60	Vincent O'Connor	778
LH-C144-DPIP-61	Oriel Windfarm Limited	80
LH-C144-DPIP-62	Department of Climate, Energy and the Environment	81
LH-C144-DPIP-63	Mary Fischer	282
LH-C144-DPIP-64	Frank Lynch	86
LH-C144-DPIP-65	Blackrock Tidy Towns	87
LH-C144-DPIP-66	The Heritage Council	91
LH-C144-DPIP-67	John Spain Associates on behalf of Lajona Limited	101
LH-C144-DPIP-68	Thomas Conry	102
LH-C144-DPIP-69	David Hughes	282
LH-C144-DPIP-70	Cilla McCoy	282
LH-C144-DPIP-71	David Hughes	103
LH-C144-DPIP-72	Boyne Sports Campus Community	105
LH-C144-DPIP-73	Declan Commons	282
LH-C144-DPIP-74	Eamonn Carroll	282
LH-C144-DPIP-75	Jerome an Ann McEvoy	108
LH-C144-DPIP-76	Anne Hughes	282
LH-C144-DPIP-77	Brian Murphy	282
LH-C144-DPIP-78	Elaine Carroll	282
LH-C144-DPIP-79	Cllr Andrea McKeivitt on behalf of Ciarán and Miceál Hanlon	108
LH-C144-DPIP-80	Cllr Andrea McKeivitt	282
LH-C144-DPIP-81	Claire & Peter Murphy	282



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-82	Alan Bothwell	282
LH-C144-DPIP-83	Carol Cooley	286
LH-C144-DPIP-84	Katie Cooley	286
LH-C144-DPIP-85	Aileen McCarron	286
LH-C144-DPIP-86	Eva McGuinness	286
LH-C144-DPIP-87	Steven Peck Chartered Town Planner on behalf of Niall Keenan and Thomas Keenan	110
LH-C144-DPIP-88	Bernie McGuinness	286
LH-C144-DPIP-89	Steven Peck Chartered Town Planner on behalf of Alltec Fibre Ltd and Elizabeth Keenan	113
LH-C144-DPIP-90	Steven Peck Chartered Town Planner on behalf of Alltec Fibre Ltd	116
LH-C144-DPIP-91	Dominic McGuinness	286
LH-C144-DPIP-92	Darcie Trant	282
LH-C144-DPIP-93	Erin McGuinness	286
LH-C144-DPIP-94	Fionn McGuinness	286
LH-C144-DPIP-95	Stella McGuinness	286
LH-C144-DPIP-96	Robert McGuinness	286
LH-C144-DPIP-97	Brady Hughes Consulting on behalf of The Callan Family	119
LH-C144-DPIP-98	Gillian Curtis	282
LH-C144-DPIP-99	Brady Hughes Consulting on behalf of The Caffrey Family	122
LH-C144-DPIP-100	Brady Hughes Consulting on behalf of The Hartigan Family	124
LH-C144-DPIP-101	Mary Brannock	282
LH-C144-DPIP-102	Brady Hughes Consulting on behalf of Apolloseven Properties One Limited	126
LH-C144-DPIP-103	Brady Hughes Consulting on behalf of Propchain Solutions and The Sands Family	139
LH-C144-DPIP-104	Patrick Mongey	131
LH-C144-DPIP-105	Eugene Matthews	133
LH-C144-DPIP-106	Transport Infrastructure Ireland (TII)	135
LH-C144-DPIP-107	Michael Carr	141



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-108	Brady Hughes Consulting on behalf of Barney Flannery	142
LH-C144-DPIP-109	Michael Cannon for and on behalf of Groveview Builders Ltd	145
LH-C144-DPIP-110	Tommy Commons	282
LH-C144-DPIP-111	Nicola McGarrity	282
LH-C144-DPIP-112	Destrina Ltd	146
LH-C144-DPIP-113	Genesis Planning Consultants on behalf of Moffett Investments	148
LH-C144-DPIP-114	Lisa Abel	282
LH-C144-DPIP-115	Josie O'Doherty	282
LH-C144-DPIP-116	Shrewsbury Manor Residents	150
LH-C144-DPIP-117	Martin Hanratty	282
LH-C144-DPIP-118	Oisin Smyth	282
LH-C144-DPIP-119	Fintan Smyth	282
LH-C144-DPIP-120	Niall McCarragher	282
LH-C144-DPIP-121	Eileen Smyth	282
LH-C144-DPIP-122	ClIr Robert Nash	282
LH-C144-DPIP-123	Sandra McBride	282
LH-C144-DPIP-124	Ciaran Rafferty	282
LH-C144-DPIP-125	Avril de Casseres	282
LH-C144-DPIP-126	Kevin Smith	282
LH-C144-DPIP-127	Catherine Murphy McCormack	282
LH-C144-DPIP-128	Aimee Smyth	282
LH-C144-DPIP-129	ClIr Robert Nash	151
LH-C144-DPIP-130	Margaret McCann	282
LH-C144-DPIP-131	Patrick & Pamela Hughes	282
LH-C144-DPIP-132	Vanessa Fischer	282
LH-C144-DPIP-133	Paddy Phillips	282
LH-C144-DPIP-134	ClIr Robert Nash	152
LH-C144-DPIP-135	Eilish Kane	282
LH-C144-DPIP-136	ClIr Robert Nash	153



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-137	James Quinn	282
LH-C144-DPIP-138	Brian Treanor	282
LH-C144-DPIP-139	Michael John Hanlon	282
LH-C144-DPIP-140	Eugene Toner	282
LH-C144-DPIP-141	Liam Woods	282
LH-C144-DPIP-142	Eilish Sheelan	282
LH-C144-DPIP-143	Denise O'Doherty	282
LH-C144-DPIP-144	Joe Douglas	154
LH-C144-DPIP-145	Katie Breaden	282
LH-C144-DPIP-146	Pat Finnegan	282
LH-C144-DPIP-147	Eileen Toner	282
LH-C144-DPIP-148	John Paul Sheelan	282
LH-C144-DPIP-149	Teresa Finnegan	282
LH-C144-DPIP-150	Ann McVeigh	156
LH-C144-DPIP-151	Patrick Toner	282
H-C144-DPIP-152	Premier Periclase Limited	157
LH-C144-DPIP-153	Joe Finnegan	282
LH-C144-DPIP-154	Grace Finnegan	282
LH-C144-DPIP-155	Sarah Finnegan	282
LH-C144-DPIP-156	Olivia Finnegan	282
LH-C144-DPIP-157	Olivia Finnegan	282
LH-C144-DPIP-158	Yvonne Finnegan	282
LH-C144-DPIP-159	Residents of Congress Avenue, Mount St Oliver, Cherrybrook Drive, Priest Lane & Marian Park in Drogheda	160
LH-C144-DPIP-160	Joe Toner	282
LH-C144-DPIP-161	Edward Boyd	282
LH-C144-DPIP-162	PJ Shields	282
LH-C144-DPIP-163	Steven Peck Chartered Town Planner on behalf of Calmont Ventures Limited	163
LH-C144-DPIP-164	The Institute of Geologists of Ireland	166
LH-C144-DPIP-165	Seosamh Delahunty	167



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-166	MKO on behalf of Philomena Kirk	168
LH-C144-DPIP-167	John O'Doherty	282
LH-C144-DPIP-168	M C	282
LH-C144-DPIP-169	John James O'Doherty	282
LH-C144-DPIP-170	Department for Infrastructure	169
LH-C144-DPIP-171	Our Lady's College, Greenhills, Drogheda	170
LH-C144-DPIP-172	McCutcheon Halley Chartered Planning Consultants on behalf of Glenveagh Homes	172
LH-C144-DPIP-173	John Spain Associates on behalf of GEM Construction	176
LH-C144-DPIP-174	Brady Hughes Consulting on behalf of Andrew Purcell and Des Campbell	180
LH-C144-DPIP-175	Inland Fisheries Ireland	183
LH-C144-DPIP-176	Kevin Enright	186
LH-C144-DPIP-177	Dom Gradwell on behalf of Drogheda Vacancy & Dereliction Group	187
LH-C144-DPIP-178	Peter Sheils	192
LH-C144-DPIP-179	Áine Walsh on behalf of Boyne Valley Walking	193
LH-C144-DPIP-180	Office of the Planning Regulator (OPR)	196
LH-C144-DPIP-181	ClIr Shane McGuinness	282
LH-C144-DPIP-182	Trevor Kirwan	201
LH-C144-DPIP-183	Kilsaran Concrete Unlimited Company	202
LH-C144-DPIP-184	Eunice O'Neill	204
LH-C144-DPIP-185	An Taisce – The National Trust for Ireland	206
LH-C144-DPIP-186	Niamh McParland	210
LH-C144-DPIP-187	Madeline Treanor	282
LH-C144-DPIP-188	Dunleer Sustainable Energy Community	211
LH-C144-DPIP-189	Alison Dunne	214
LH-C144-DPIP-190	Stuart Collins	282
LH-C144-DPIP-191	Electricity Supply Board (ESB)	215
LH-C144-DPIP-192	Finn Design Partnership on behalf of Seamus Rogers	229
LH-C144-DPIP-193	Brady Hughes Consulting on behalf of Lorrac Developments	220



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-194	Hermione Duffy	223
LH-C144-DPIP-195	Finn Design Partnership on behalf of Seamus, John & Shane Rogers	225
LH-C144-DPIP-196	National Transport Authority (NTA)	226
LH-C144-DPIP-197	Ann Marchat	282
LH-C144-DPIP-198	McCutcheon Halley Chartered Planning Consultant on behalf of Greenore Port Unlimited	229
LH-C144-DPIP-199	Saoirse McGuinness	286
LH-C144-DPIP-200	Niamh McGuinness	286
LH-C144-DPIP-201	Michael McCarragher	282
LH-C144-DPIP-202	Leonard McGuinness	286
LH-C144-DPIP-203	Peter Murray	286
LH-C144-DPIP-204	Darragh King	286
LH-C144-DPIP-205	McGill Planning Ltd on behalf of Cairn Homes Properties Ltd	233
LH-C144-DPIP-206	Heather Christmas	282
LH-C144-DPIP-207	Caitlin King	286
LH-C144-DPIP-208	Brady Hughes Consulting on behalf of Olan McNeece	235
LH-C144-DPIP-209	Anne King	286
LH-C144-DPIP-210	Meath County Council	238
LH-C144-DPIP-211	Sinead Smyth	287
LH-C144-DPIP-212	Irish Concrete Federation	241
LH-C144-DPIP-213	SLR Environmental Consulting (Ireland) Ltd on behalf of Roadstone Limited	242
LH-C144-DPIP-214	David Smyth	286
LH-C144-DPIP-215	Patrick Smyth	244
LH-C144-DPIP-216	SLR Environmental Consulting (Ireland) Ltd on behalf of Belgard Estates Limited	245
LH-C144-DPIP-217	SLR Environmental Consulting (Ireland) Ltd on behalf of Murrough Holdings Limited	247
LH-C144-DPIP-218	SLR Environmental Consulting (Ireland) Ltd on behalf of Irish Cement Limited	248
LH-C144-DPIP-219	Ellen Mathews of Drogheda Vacancy and Dereliction Group	250



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-220	Cllr John Reilly	282
LH-C144-DPIP-221	Paul Lane Jr	254
LH-C144-DPIP-222	Peter Lane	286
LH-C144-DPIP-223	Paul Smith	286
LH-C144-DPIP-224	Paul Lane	255
LH-C144-DPIP-225	Fáilte Ireland	256
LH-C144-DPIP-226	Stephen Little & Associates Chartered Town Planners & Development Consultants on behalf of Castlethorn	258
LH-C144-DPIP-227	Jane O'Reilly	282
LH-C144-DPIP-228	Dermot Sweeney	286
LH-C144-DPIP-229	Iarnród Éireann (Irish Rail)	262
LH-C144-DPIP-230	Kenneth D Lonergan & Associates Ltd on behalf of Assist Property Ltd	264
LH-C144-DPIP-231	Sarah King	286
LH-C144-DPIP-232	Barry McGuinness	286
LH-C144-DPIP-233	Lily Carter	286
LH-C144-DPIP-234	Aiden Carter	286
LH-C144-DPIP-235	Doireann Carter	286
LH-C144-DPIP-236	Department of Housing, Local Government and Heritage	266
LH-C144-DPIP-237	Eibhlín Ní Chuinneagáin	282
LH-C144-DPIP-238	Dundalk Chamber	269
LH-C144-DPIP-239	Downey Planning	271
LH-C144-DPIP-240	Cllr Marianne Butler	274
LH-C144-DPIP-241	Damian Duff	275
LH-C144-DPIP-242	Office of Public Works (OPW)	276
LH-C144-DPIP-243	Sean Smyth	282
LH-C144-DPIP-244	Finn Carter	286
LH-C144-DPIP-245	Nicola Carter	286
LH-C144-DPIP-246	James Wood	282
LH-C144-DPIP-247	Dermon Breen	276
LH-C144-DPIP-248	Ruadhán Carter	286



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-249	Leon Bolger	286
LH-C144-DPIP-250	Mary Bolger	286
LH-C144-DPIP-251	John Conway	278
LH-C144-DPIP-252	Kathleen Bolger	286
LH-C144-DPIP-253	Kieran Bolger	286
LH-C144-DPIP-254	Pearce Gorman	286
LH-C144-DPIP-255	Gary Gorman	286
LH-C144-DPIP-256	Mary Gorman	286
LH-C144-DPIP-257	Grace Gorman	286
LH-C144-DPIP-258	Emmett Gorman	286
LH-C144-DPIP-259	Ellen Gorman	286
LH-C144-DPIP-260	Harumi Hosana Da Silva	286
LH-C144-DPIP-261	Oliver Taaffe	286
LH-C144-DPIP-262	Orla Meehan	286
LH-C144-DPIP-263	John King	286
LH-C144-DPIP-264	Andrew Lynch	286
LH-C144-DPIP-265	Gerard King	286
LH-C144-DPIP-266	Michael Gregory	286
LH-C144-DPIP-267	Patricia King	286
LH-C144-DPIP-268	Michael Meehan	286
LH-C144-DPIP-269	Vivien Lynch	286
LH-C144-DPIP-270	Oliver Lynch	286
LH-C144-DPIP-271	Leslie Losty	286
LH-C144-DPIP-272	Sinead Meehan	286
LH-C144-DPIP-273	Ian Halliday	286
LH-C144-DPIP-274	Frank McCullough	286
LH-C144-DPIP-275	Jade Halliday	286
LH-C144-DPIP-276	Monica McCullough	286
LH-C144-DPIP-277	Sean Halliday	286
LH-C144-DPIP-278	Stephen Meehan	286
LH-C144-DPIP-279	James Stokes	286



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-280	Sheila Meehan	286
LH-C144-DPIP-281	David Stokes	286
LH-C144-DPIP-282	Barry Meehan	286
LH-C144-DPIP-283	Jack Stokes	286
LH-C144-DPIP-284	Ben Meehan	286
LH-C144-DPIP-285	Paula Losty	286
LH-C144-DPIP-286	Henry Durnin	286
LH-C144-DPIP-287	Mary Durnin	286
LH-C144-DPIP-288	Kate Powderly	286
LH-C144-DPIP-289	Collette Powderly	286
LH-C144-DPIP-290	Joe Powderly	286
LH-C144-DPIP-291	Paudi Kelly	286
LH-C144-DPIP-292	Thomas Cooley	286
LH-C144-DPIP-293	Pierce Kelly	286
LH-C144-DPIP-294	Nina Kelly	286
LH-C144-DPIP-295	Des Carroll	286
LH-C144-DPIP-296	William Carroll	286
LH-C144-DPIP-297	Doreen Bowhan	286
LH-C144-DPIP-298	Jason Bowhan	286
LH-C144-DPIP-299	Dan Bowhan	286
LH-C144-DPIP-300	Darcie Bowhan	286
LH-C144-DPIP-301	Paul Duff	279
LH-C144-DPIP-302	Patrick Duff	286
LH-C144-DPIP-303	James Duff	286
LH-C144-DPIP-304	Helen Monaghan	286
LH-C144-DPIP-305	Emily Monaghan	286
LH-C144-DPIP-306	Sarah Monaghan	286
LH-C144-DPIP-307	James Monaghan	286
LH-C144-DPIP-308	Peter Monaghan	286
LH-C144-DPIP-309	Isaac Monaghan	286
LH-C144-DPIP-310	Myles Monaghan	286



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-311	Justin Callaghan	286
LH-C144-DPIP-312	Selina Callaghan	286
LH-C144-DPIP-313	Clodagh Callaghan	286
LH-C144-DPIP-314	Winigrad Callaghan	286
LH-C144-DPIP-315	Julian Callaghan	286
LH-C144-DPIP-316	Máire Ní Choilm	286
LH-C144-DPIP-317	Leonard Callaghan	286
LH-C144-DPIP-318	Charlotte Callaghan	286
LH-C144-DPIP-319	Shane Sweeney	286
LH-C144-DPIP-320	Alice Cunningham	286
LH-C144-DPIP-321	Jimmy Cunningham	286
LH-C144-DPIP-322	Dale Mulroy	286
LH-C144-DPIP-323	Mary Mulroy	286
LH-C144-DPIP-324	David Mulroy	286
LH-C144-DPIP-325	Christine Duff	286
LH-C144-DPIP-326	Maisi McCabe	286
LH-C144-DPIP-327	Eoghan McCabe	286
LH-C144-DPIP-328	Jim McCabe	286
LH-C144-DPIP-329	Erinmay McCabe	286
LH-C144-DPIP-330	Brian McCabe	286
LH-C144-DPIP-331	Paidi McCabe	286
LH-C144-DPIP-332	Linda McCabe	286
LH-C144-DPIP-333	Sarah Stokes	286
LH-C144-DPIP-334	Brendan Stokes	286
LH-C144-DPIP-335	Julie Bowhan	286
LH-C144-DPIP-336	Rita Bowhan	286
LH-C144-DPIP-337	Patrice Bowhan	286
LH-C144-DPIP-338	Mary Shearman	286
LH-C144-DPIP-339	John Shearman	286
LH-C144-DPIP-340	Paul Cunningham	280
LH-C144-DPIP-341	Peter Cunningham	286



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-342	Adam Cunningham	286
LH-C144-DPIP-343	Michelle Cunnigham	286
LH-C144-DPIP-344	Maryrose McCullough	286
LH-C144-DPIP-345	Conor McCullough	286
LH-C144-DPIP-346	Cillian McCullough	286
LH-C144-DPIP-347	William Sullivan	286
LH-C144-DPIP-348	Sharon Walsh	286
LH-C144-DPIP-349	Sev Meehan	286
LH-C144-DPIP-350	Fay Meehan	286
LH-C144-DPIP-351	Breagha Meehan	286
LH-C144-DPIP-352	Michael Meehan	286
LH-C144-DPIP-353	Noel Walker	286
LH-C144-DPIP-354	David McCullough	286
LH-C144-DPIP-355	Rebecca McCullough	286
LH-C144-DPIP-356	Sandra McCullough	286
LH-C144-DPIP-357	Ryan McCullough	286
LH-C144-DPIP-358	Carl Curtis	286
LH-C144-DPIP-359	Geraldine Walker	286
LH-C144-DPIP-360	Teresa Rooney	286
LH-C144-DPIP-361	Dominic Rooney	286
LH-C144-DPIP-362	Ursula Rafferty	286
LH-C144-DPIP-363	Paul Meehan	280
LH-C144-DPIP-364	James Meehan	286
LH-C144-DPIP-365	Joe Meehan	286
LH-C144-DPIP-366	Dylan Meehan	286
LH-C144-DPIP-367	Fiona McGuinness	286
LH-C144-DPIP-368	Emma McGuinness	286
LH-C144-DPIP-369	Andrew McGuinness	286
LH-C144-DPIP-370	Chloe McGuinness	286
LH-C144-DPIP-371	Breda McGuinness	286
LH-C144-DPIP-372	Ben Sweeney	286



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-373	Zara Sweeney	286
LH-C144-DPIP-374	Ruth McGuinness	286
LH-C144-DPIP-375	Anna Sweeney	286
LH-C144-DPIP-376	Loretta Murtagh	286
LH-C144-DPIP-377	Francis Murtagh	286
LH-C144-DPIP-378	James Cunningham	286
LH-C144-DPIP-379	Paula Johnston	286
LH-C144-DPIP-380	Shane Johnston	286
LH-C144-DPIP-381	David Johnston	286
LH-C144-DPIP-382	Valerie Keaskin	286
LH-C144-DPIP-383	Josh Keaskin	286
LH-C144-DPIP-384	Holly Keaskin	286
LH-C144-DPIP-385	Benny Keaskin	286
LH-C144-DPIP-386	John O'Connor	286
LH-C144-DPIP-387	Lorcan O'Connor	286
LH-C144-DPIP-388	Patrick James O'Connor	286
LH-C144-DPIP-389	Shirley O'Connor	286
LH-C144-DPIP-390	Gary Dromgoole	286
LH-C144-DPIP-391	Joyce Dromgoole	286
LH-C144-DPIP-392	Lucy Bolger	286
LH-C144-DPIP-393	Kate Bolger	286
LH-C144-DPIP-394	Tom Bolger	286
LH-C144-DPIP-395	Hanna Bolger	286
LH-C144-DPIP-396	Enda Bolger	286
LH-C144-DPIP-397	Denise Bolger	286
LH-C144-DPIP-398	Mary Connolly	286
LH-C144-DPIP-399	Noel Reilly	286
LH-C144-DPIP-400	Ross Kearney	286
LH-C144-DPIP-401	Thomas Kearney	286
LH-C144-DPIP-402	Seamus Kearney	286
LH-C144-DPIP-403	Julie Kearney	286



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-404	Ella Kearney	286
LH-C144-DPIP-405	Orla Kearney	286
LH-C144-DPIP-406	Seamus Murray	286
LH-C144-DPIP-407	Rita Murray	286
LH-C144-DPIP-408	Niall Murray	286
LH-C144-DPIP-409	John Taaffe	286
LH-C144-DPIP-410	Joseph Taaffe	286
LH-C144-DPIP-411	Declan Taaffe	286
LH-C144-DPIP-412	Mary Taaffe	286
LH-C144-DPIP-413	Helen Taaffe	286
LH-C144-DPIP-414	Katie Taaffe	286
LH-C144-DPIP-415	May Flanagan	286
LH-C144-DPIP-416	Ella Flanagan	286
LH-C144-DPIP-417	Peter Flanagan	286
LH-C144-DPIP-418	Sinéad Kearney	286
LH-C144-DPIP-419	Ciarán Kearney	286
LH-C144-DPIP-420	Dermot Smyth	286
LH-C144-DPIP-421	Claire Smyth	286
LH-C144-DPIP-422	Alan Dalton	286
LH-C144-DPIP-423	Anne Coyle	286
LH-C144-DPIP-424	Marcus Winstone	286
LH-C144-DPIP-425	Linda Winstone	286
LH-C144-DPIP-426	Jake Cunningham	286
LH-C144-DPIP-427	Jamie Cunningham	286
LH-C144-DPIP-428	Karen Cunningham	286
LH-C144-DPIP-429	Sean Powderly	286
LH-C144-DPIP-430	Niall Powderly	286
LH-C144-DPIP-431	Marion Murphy	282
LH-C144-DPIP-432	Eugene Oliver	282
LH-C144-DPIP-433	Geraldine Keenan	282
LH-C144-DPIP-434	Thomas Keenan	282



Submission Reference	Name	Page on CE Report
LH-C144-DPIP-435	Breda McGrane	282
LH-C144-DPIP-436	Martin & Pauline Craven	282
LH-C144-DPIP-437	Tony Clarke	282
LH-C144-DPIP-438	Jennifer Armstrong	282
LH-C144-DPIP-439	Emer Doran	282
LH-C144-DPIP-440	Edward Armstrong	282
LH-C144-DPIP-441	Ciarán Doran	282
LH-C144-DPIP-442	Colin Hanlon	282
LH-C144-DPIP-443	Ciaran Hanlon	282
LH-C144-DPIP-444	Thomas Keenan Jr	282
LH-C144-DPIP-445	Patrick Keenan	282
LH-C144-DPIP-446	Derek McGrane	282
LH-C144-DPIP-447	Cailín Keenan	282
LH-C144-DPIP-448	Mary Teresa McIntyre	282
LH-C144-DPIP-449	John G Murphy	282
LH-C144-DPIP-450	Tony Loughran	282
LH-C144-DPIP-451	Geraldine McGrath	282
LH-C144-DPIP-452	Micheal Keenan	282
LH-C144-DPIP-453	John Doran	282
LH-C144-DPIP-454	Sean Traynor	282
LH-C144-DPIP-455	Owen Treanor	282
LH-C144-DPIP-456	Joanne Traynor	282
LH-C144-DPIP-457	Michael Traynor	282
LH-C144-DPIP-458	Anthony McGrath	282
LH-C144-DPIP-459	Vivienne McGrath	282
LH-C144-DPIP-460	Majella Keenan	282
LH-C144-DPIP-461	Michael John Hanlon	282
LH-C144-DPIP-462	Carla McGrath	282
LH-C144-DPIP-463	Mary & Tony Clarke	282



Appendix 3 – List of Prescribed Bodies Notified

1.	An Coimisiún Pleanála	23.	An Taisce
2.	Minister For Housing, Local Government and Heritage	24.	Irish Water
3.	Department of Housing, Planning & Local Government	25.	Meath County Council
4.	Minister for Agriculture, Food & the Marine	26.	Monaghan County Council
5.	Minister for Culture, Heritage & the Gaeltacht	27.	Newry & Mourne District Council
6.	Minister for Communications, Climate Action & Environment	28.	EMRA - Eastern and Midland Regional Assembly
7.	Minister for Defence	29.	Transport Infrastructure Ireland
8.	Minister for Education & Skills	30.	Planning Service (NI)
9.	Dept of Education & Skills (Site Acquisitions and Property Management)	31.	Craigavon Divisional Planning Office
10.	Minister for Transport, Tourism & Sport	32.	Department for Regional Development (NI)- Strategic Planning Directorate
11.	An Comhairle Ealaíon (Arts Council)	33.	Department of Business, Enterprise & Innovation (formerly Forfás)
12.	Dublin Airport Authority	34.	Northern & Western Regional Assembly (NWRA)
13.	National Transport Authority	35.	OPW - Office of Public Works (formerly the Commissioners)
14.	EirGrid Plc.	36.	OPR - Office of the Planning Regulator
15.	EPA - Environmental Protection Agency	37.	ICLRD - International Centre for Local & Regional Development
16.	ESB	38.	Centre for Local & Regional Studies
17.	Fáilte Ireland	39.	National Transport Authority (NTA)
18.	Health Service Executive	40.	NISRA - NI for Regional & Spatial Analysis
19.	Heritage Council	41.	NWRA - Northern & Western Regional Assembly
20.	HSA - Health & Safety Authority	42.	BT Communications Ireland Ltd
21.	IFI - Inland Fisheries Ireland (HQ)	43.	SRA - Southern Regional Assembly
22.	NRA - National Roads Authority		



Appendix 4 – List of Elected & Oireachtas Members Notified

Elected Members

1.	John Sheridan
2.	Rachel Kerley
3.	Pearse McGeough
4.	Dolores Minogue
5.	Bernie Conlon
6.	Jim Tenanty
7.	Pio Smith
8.	Debbie McCole
9.	Kevin Callan
10.	James Byrne
11.	Paddy McQuillan
12.	Ejiro O'Hare Stratton
13.	Michelle Hall
14.	Eric Donovan
15.	Declan Power

16.	Anne-Marie Ford
17.	Fiona Mhic Conchoille
18.	Sean Kelly
19.	Ciarán Fisher
20.	John Reilly
21.	Andrea McKeivitt
22.	Antóin Watters
23.	Emma Coffey
24.	Marianne Butler
25.	Shane McGuinness
26.	Kevin Meenan
27.	Sionainn McCann
28.	Maeve Yore
29.	Robert Nash

Oireachtas Members

1.	Paula Butterly
2.	Joanna Byrne
3.	Erin McGreehan
4.	Ged Nash
5.	Ruairí Ó Murchú
6.	Senator Alison Comyn



Appendix 5 – Stakeholders & Others

1	3G	31	Gareth Collier - DGS
2	ABP	32	GAS Network
3	Ace Environmental	33	Gas Networks Ireland
4	AES - Midland Waste Disposal	34	Ger Fahy Planning
5	Allied Waste Disposal	35	Greenore Port Limited
6	An Garda Síochána	36	GSI
7	Bord Gáis	37	Halpenny Travel
8	Brian Hughes	38	Iarnród Éireann
9	Bridget Ryan - Cannon Kirk Group	39	ICTU - Irish Congress of Trade Unions
10	Bruce Dodd	40	IDA Ireland
11	BT Communication Ireland Ltd	41	IFA - Irish Farmers Association
12	Bus Eireann	42	IRCG - Irish Coast Guard
13	Cairn Homes	43	Irish Defence Forces
14	Celtic Roads Group	44	Irish Red Cross
15	Citizens Information	45	KN Network Service
16	Coillte	46	Klaudia Romanow
17	Construction Industry Federation	47	LMETB
18	Damian J Duff	48	LMFM
19	DKIT	49	Loughs Agency
20	Drogheda Chamber of Commerce	50	Louth County Childcare Committee
21	Drogheda/Dundalk Port Company	51	Louth Economic Forum
22	Dublin Docklands	52	Louth LCDC
23	Dublin Port	53	Louth Leader
24	Dundalk Chamber of commerce	54	Louth LEO
25	Dundalk FM	55	Mathews Coach Hire
26	Dundalk Simon Community	56	Mark Mohan
27	Educate Together	57	Michael O'Hora -ABB
28	EIR	58	Order of Malta
29	E-Net	59	Oxigen Environmental
30	Enterprise Ireland	60	Panda Waste Disposal



61	Paula Galvin
62	Peter Brennan
63	PPN (Louth)
64	Pure Telecom
65	RNLI Lifeboat
66	Roads service Northern Ireland
67	Roger Garland
68	Samaritans
69	SEAI
70	Seamus Walker
71	SIRO
72	Shane Rafferty
73	Stephen Little & Associates
74	Stephen Ward Town Planning
75	St Vincent de Paul
76	Tanya Yeoman
77	The Commissioners
78	The Planning Partnership
79	Traveller Accommodation Group
80	V & W Recycling (Dundalk/Drogheda)
81	Vera Reilly
82	Virgin Media
83	Vodafone Irl
84	Member of SPC & MD's



Appendix 6 – List of Primary Schools Notified

1.	Ardaghy NS	37.	Scoil Bhríde Dunleer
2.	Ardee Educate Together	38.	Scoil Eoin Baiste
3.	Aston Village NS	39.	Scoil Muire Na nGael
4.	Ballapousta NS	40.	Scoil Mhuire Na Trócaire
5.	Bellurgan NS	41.	Scoil Naomh Lorcan
6.	Blackrock NS	42.	Scoil San Nicholas
7.	Callystown NS	43.	Sheelagh NS
8.	Cartown NS	44.	St Brigids NS
9.	Castletown NS	45.	St Patrick's NS
10.	C.B.S Primary	46.	St Buites NS
11.	Collon NS	47.	St Colmcille NS
12.	Darver NS	48.	St Fechin's
13.	Dillonstown NS	49.	St Francis NS
14.	Dromin NS	50.	St Fursey's NS
15.	Dulargy NS	51.	St Joseph's NS (Dundalk)
16.	Dún Dealgan NS	52.	St Joseph's NS (Mell)
17.	Faughart NS	53.	St Kevin's NS
18.	Gaelscoil Dhún Dealgan	54.	St Malachy's NS
19.	Kilcurry NS	55.	St Malachy's BNS
20.	Kilkerley NS	56.	St Malachy's GNS
21.	Kilsaran NS	57.	ST Malachy INS
22.	St Mary's NS, Knockbridge	58.	St Mary's Parish Primary School
23.	Le Cheile Educate Together	59.	St Mochtas NS
24.	Marymount NS	60.	St Nicholas Monastery NS
25.	Monksland NS	61.	St Nicholas NS
26.	Monastery NS	62.	St Oliver's NS
27.	Muchgrange NS	63.	St Oliver's NS (Carlingford)
28.	Mullaghbuoy NS	64.	St Patrick NS
29.	Presentation NS	65.	St Paul's NS
30.	Rampark NS	66.	St Peter's NS
31.	Rathcor NS	67.	Stonestown NS
32.	Rathmullen NS	68.	Sunday's Gate NS
33.	Realt Na Mara	69.	Tallanstown NS
34.	Redeemer BNS	70.	Tullystown NS
35.	Redeemer GNS	71.	Walshestown NS
36.	Scoil Aonghusa		



Appendix 7 List of Post Primary/Third Leve Schools/College Notified

1.	Ardee Community School
2.	Ballymakenny College
3.	Bush Post Primary School
4.	Coláiste Cú Chulainn
5.	Coláiste Rís
6.	De La Salle College
7.	Drogheda Grammar School
8.	Drogheda Institute of Further Education
9.	Dundalk Grammar School
10.	Ó Fiaich College
11.	Our Lady's College
12.	Sacred Heart Secondary School
13.	Scoil Uí Mhuirí
14.	St. Joseph's C.B.S.
15.	St Louis Secondary School
16.	St Mary's College
17.	St Mary's Diocesan School
18.	St Oliver's Community College
19.	St Vincent's Secondary School



Appendix 8 – List of Early Childcare Facilities Notified

1.	ABC Childsplay Crèche and Preschool	30.	Little Rascals
2.	Absolute Angels Crèche & Montessori	31.	Little Treasures Playschool
3.	Aladdin's Cave Montessori School & Crèche	32.	Moneymore Childcare Centre
4.	Aunty Paula's Preschool Crèche	33.	Naíonra Dhún Dealgan
5.	Ballapousta Early Learning School	34.	Peekaboo Crèche Ltd.
6.	Bright Beginnings	35.	Pugwash Bay Ltd.
7.	Cheeky Monkey Montessori School	36.	Realt na Mara Pre-School
8.	Children's World	37.	Redeemer Crèche & Playgroup
9.	Claddagh Treasures	38.	Scallywags
10.	Colpe Daycare Centre	39.	Scallywags Crèche
11.	Connect Preschool	40.	Scoil Beag
12..	Cooley Community Playgroup	41.	Scoil Eoin Baiste
13.	De La Salle Preschool	42.	Shapes & Sizes
14.	Faughart Scholars	43.	Stabannon & District Preschool Ltd
15.	Ferndale Crèche & Montessori	44.	Stepping Stones
16.	Greenacres Playschool	45.	Stepping Stones Early Learning Centre
17.	Happy Days Playschool	46.	The Grove Early Years Education Centre
18.	Happy Days Preschool	47.	The Playroom Project
19.	Hidden Treasures ASC	48.	The Wendy House
20.	Holy Family Community Crèche	49.	Tiny Tots Crèche Dundalk
21.	Jellytots Daycare & Montessori	50.	Tiny Tots Montessori
22.	Just Kids Crèche	51.	Tiny Tots Nursery
23.	Kangaroo Childcare	52.	Tír na nÓg Childcare
24.	Kidz Cottage	53.	Toddlers Hill Crèche & Montessori
25.	Lios Na nÓg Playgroup Ltd	54.	Tots & Co. Playgroup
26.	Little & Big Rascals	55.	Tus Maith Montessori School
27.	Little Munchkins Crèche	56.	Wheaton Montessori Academy
28.	Little Nippers Playschool	57.	Wizkids
29.	Little Partners Crèche Ltd	58.	Woddlers & Toddlers

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Halla an Bhaile
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