

26th November 2019

Mr Frank Pentony,
Development Plan Review,
Forward Planning Unit,
Town Hall, Crowe Street,
Dundalk,
Co. Louth

Re: Issues Paper for the Draft Louth County Development Plan 2021 – 2027

Dear Mr Pentony,

Thank you for your authority's work in preparing the *Louth County Development Plan 2021–2027, Issues Paper*. The OPR acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the review of the Louth County Development Plan.

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the *National Planning Framework* and the *Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031*;
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some broad pointers for your authority to consider in formulating the draft development plan.

These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at draft and amended draft development plan stages.

Core Strategy & Settlement Strategy

The formulation of the core strategy in line with section 10 of the Act is the most significant element in developing your authority's draft development plan.

The National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly area are key determinants for the core strategy.

The NPF sets out a settlement strategy for the upper two tiers of settlements across the State, with Drogheda and Dundalk identified as Regional Centres on the strategic Dublin–Belfast Corridor, linked to the centre of Newry in Northern Ireland (National Planning Objective (NPO) 2b and NPO7, refer).

The NPF also signals the Government's intention to secure a more sustainable and compact urban development pattern into the future, such as ensuring that in meeting such housing needs, at least 30% of all new homes will be delivered within urban areas on infill and brownfield sites (NPO3c).

Working in sync with the NPF, the RSES aims to promote the development of both Drogheda and Dundalk as Regional Growth Centres with a view to achieving a population of 50,000 persons by 2031 (table 3.1 refers).

These population parameters, coupled to the requirement for a 30% delivery of new housing within existing urban areas from infill and brownfield development are critical determinants for the core strategy.

At the same time and from a short analysis of the existing development plan, the Office considers there may be a significant mismatch between the extent of lands currently zoned and what would arise in the context of an analysis of need, bearing in mind the factors above. Extant planning permissions also need to be factored in to the above.

Notwithstanding all of the above, a key function of any core strategy is to focus on a preferred approach to both the spatial pattern and quantity of housing delivery over the lifetime of the plan. In other words, the core strategy should identify key locations and opportunity sites, which Louth County Council considers capable in physical and social infrastructure terms, that can be delivered over the plan period in a manner that supports the achievement of wider national and regional planning policies and objectives.

Therefore, in developing the core strategy, quantification of the need for housing lands needs to be considered in conjunction with known and anticipated patterns of delivery and the achievement of the brownfield / infill targets and national/regional policy context.

The Office will provide further practical advice and technical support in the working out of the core strategy parameters above and within our statutory remit as you may require.

Moreover, the NPF and the RSES acknowledge the location of Drogheda and its contiguous urban area straddling the boundary between Louth and Meath County Councils, signalling the need for a Joint Urban Area Plan (UAP) to be prepared jointly by Louth and Meath County Councils (Regional Planning Objective (RPO) 4.11).

In this regard, the Office would highlight the provisions of section 9(4) of the Act, which states:

In making a development plan in accordance with this Chapter, a planning authority shall have regard to the development plans of adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities except where the planning authority considers it to be inappropriate or not feasible to do so.

Having regard to the above, engagement and co-ordination with the ongoing review of the Meath County Development Plan by Meath County Council would be essential and the Office will seek evidence of the above in the next stage of your development plan review process.

The review of the Louth County Development Plan must also necessarily take place before a review of the development plans for Drogheda and Dundalk. Given the elapse of time since such plans were prepared, your authority should consider any strategic objectives that may be required in the county development plan to provide a more current planning framework for the future development of these locations and one that would set a context for their next local area plans.

Economic Development & Employment

Development of planning policies and objectives to secure the potential of Drogheda-Dundalk-Newry in accordance with RPO 4.13, in addition to the NPOs and RPOs referred to above, will be a key consideration in the planning for economic development of the county. Louth County Council has a well-developed suite of economic development actions and policies to draw from in this regard.

Transport & Connectivity

The Issues Paper acknowledges the need to identify and prioritise transport infrastructure within a policy framework to provide scope for new development. It also recognises the significance of active transport modes as a means of improving sustainable connectivity. The Guiding Principles for Integration of Land Use and Transport under the RSES should inform the plan, as required by RPO 8.1 and RPO 8.4. Compliance with this approach may assist your authority's plan in meeting mandatory objective section 10(2)(n).

Infrastructure

As your authority will be aware, a major opportunity is currently available to ensure alignment between planning and infrastructure whereby plans at local level may be supported by capital investment where aligned with the objectives and policies of the regional and national level plans. In this regard, a central element of the NPF relates to the renewal and consolidation of underutilised parts of cities, regional and rural towns and villages (NPO3c refers). These areas can avail of existing infrastructure, or enable the investment in infrastructure for sustainable urban and rural development. In this regard, any strategy for the prioritisation of provision of water / wastewater infrastructure should be based on the growth strategy objectives under the NPF and the RSES, as referred to above.

Climate Action and Energy

Having regard to the *Climate Action Plan 2019* and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction of carbon emissions is a central planning policy issue to be addressed in the draft development plan.

¹ National Development Plan, 2018 - 2027

The Office understands that forthcoming updates to the 'Section 28' Development Plan Guidelines will initiate a process of enhanced guidance for the preparation of plans. This will include guidance on the requirement under section 10(2)(n) of the Act to promote sustainable settlement and transportation strategies including measures to reduce energy demand and greenhouse gas emissions (in addition to adaptation to climate change), by virtue of the location, layout and design of new development.

Your authority will be aware that the Office's evaluation of the development plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) in its evaluations and assessments of development plans.

In this regard, the development plan should provide sufficient clarity and certainty in terms of the said measures in order to direct any future local area plans made consequent to the proposed development plan.

Similarly, the promotion of renewable energy sources within the county in accordance with the section 28 *Wind Energy Development Guidelines 2006* will also be critical to ensure Ireland meets its national targets and commitments to increasing renewable energy supply and reductions greenhouse gas emissions.

Summary

The NPF and the RSES for the Eastern and Midland Region will play pivotal roles in informing the preparation of the Louth County Development Plan 2021-2027. The Office looks forward to continued positive engagement with Louth County Council in implementation of national and regional policies at county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,

Gary Ryan

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