

21st November 2025

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

Re: Issues Paper for the Louth County Development Plan 2027-2033

A chara,

Thank you for your authority's work in preparing the Issues Paper for the review of the Louth County Development Plan 2027 – 2033 (County Development Plan). The Office of the Planning Regulator (Office) acknowledges and welcomes the publication of this Issues Paper and your authority's work more broadly in advancing the review of the County Development Plan (County Development Plan).

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (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 First Revision (2025) (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly area (EMRA);
- ministerial guidelines under section 28, in particular the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines)
- ministerial policy directives issued under section 29; and

- such other legislative and policy matters as the Minister may communicate to the Office in writing.

In relation to the RSES, please note that following the commencement of part 3, chapter 4 of the Planning and Development Act 2024¹ (2024 Act), the regional assemblies are now required to initiate a review of the 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 EMRA to ensure effective coordination between regional and local policy. The Office is happy to work with the Planning Authority in this respect.

The Office has set out some comments for your authority to consider in formulating the draft County Development Plan. These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at future stages of the plan-making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements.

1. 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.

There are many great innovative methods which can encourage further public participation on the development plan process. To assist local authorities, the Office produced a toolkit to increase public engagement in development plan making² and more recently, has worked with the EPA in the preparation of a guidance note to improve the general public's engagement in strategic environmental assessment (SEA) practice³. The guidance note outlines principles and makes recommendations to ensure that the public are meaningfully informed and consulted during SEA processes.

¹ The provisions for commencing the review of the RSES under the Planning and Development Act 2024 came into effect on 2nd October 2025.

² <https://www.opr.ie/wp-content/uploads/2020/05/Increasing-Public-Engagement-with-Local-Authority-Development-Plans-A-Communications-Toolkit.pdf>

³ <https://www.epa.ie/publications/research/environmental-technologies/Guidance-Note-on-public-participation-in-SEA---Final-version-21.03.24.pdf>

2. Core strategy and settlement strategy

The Issues Paper provides three core strategy options aimed at generating debate and discussion. The Office notes that these core strategy options will evolve as the County Development Plan progresses.

The formulation of the core strategy in line with section 10 of the Act is the most significant element in developing the County Development Plan for the period to 2033. The revised NPF and the RSES, in addition to relevant Specific Planning Policy Requirements (SPPRs) specified in Ministerial guidelines 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 for your functional area.

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 in accordance with national policy objectives.

The recently published housing plan, Delivering Homes, Building Communities 2025-2030, also emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.

A key function of the core strategy is the determination of a settlement hierarchy and the level of growth for the towns and villages across the county over the plan period consistent with RPO 3.1 of the RSES. The Office refers the Planning Authority to the Development Plans, Guidelines for Planning Authorities (2022) in relation to the distribution of population and housing targets to the various settlements in the settlement hierarchy, and the need for an evidence-based approach as referenced in RPO 4.1 of the RSES.

The recent census results indicate that the population for County Louth has increased from 128,884 (2016) to 139,703 (2022) representing an increase of 8.4% over the six-year period to 2022. The regional growth centres of Dundalk and Drogheda experienced a 10.5% and

7.8% increase in population between 2016 and 2022, respectively. Recent trends in the Southern Environs of Drogheda, which form part of the County Meath administrative area, indicate that the population in this area alone increased from 6,527 in 2016 to 8,137 in 2022⁴, representing a 25% increase in population over a six-year period. It is noted that a Joint Urban Area Plan will be prepared by both Louth County Council and Meath County Council and is further discussed below.

The Planning Authority will 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 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 in accordance with national policy objectives.

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. Furthermore, the Planning Authority should also take account of specific regional policy objectives relating to the future development of Drogheda (RPO 4.12, 4.13, 4.15, 4.16, 4.17 and 4.18) and Dundalk (RPO 4.19, 4.20, 4.21, 4.22, 4.23, 4.24 and 4.25).

The Planning Authority should also have regard to NPO 83 of the NPF to identify and strengthen green and blue spaces and to prevent coalescence of settlements while allowing for the long-term strategic expansion of urban areas as well as NPO 86, where the planning authority should seek to address no net loss of biodiversity within their plan making functions.

3. Compact growth and zoning

Compact growth is one of the National Strategic Outcomes of the NPF, with a target under National Policy Objective (NPO) 9 of the NPF to deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth'.

⁴ Two-Year Progress Report on the Meath County Development Plan 2021-2027, page 7.

The growth and settlement strategy of the RSES reflects the compact growth objectives of the NPF. In this regard, the Office highlights the guiding principles for infill and brownfield development in chapter 3 of the RSES including the establishment of a database of brownfield sites and active land management strategies (RPO 3.2 and RPO 3.3).

The Office notes the potential for regeneration, consolidation and compact growth in the designated regional growth centre of Drogheda as outlined in section 4.6 of the RSES, and that NPO 97 of the NPF provides for the Metropolitan Area Strategic Plan (MASP) to include provision for large-scale Transport Orientated Development (TOD) opportunities in the wider metropolitan area focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of TOD.

A key challenge for the forthcoming plan will be to identify opportunities for compact and sequential growth within the higher tier settlements of the county, leveraging and improving existing infrastructure, services and public transport to the benefit of existing and future residents.

In this respect, the Office highlights the policy and objective of the Development Plans Guidelines that a Settlement Capacity Audit (SCA) informs any land use zoning. An SCA is based upon sound evidence that demonstrates services are/will be available within the lifetime of the plan.

In addition, NPO 101 of the NPF and section 2.4 of the Development Plans Guidelines requires planning authorities to distinguish between lands that are serviced and those that are serviceable.

When considering zoning lands for development that requires investment in infrastructure, the Planning Authority will be expected to make a reasonable estimate of the full cost of delivery at both draft and final plan stages in accordance with NPO 102 of the NPF. This is critical to understanding the barriers and timescale for housing delivery and economic development.

The Planning Authority is advised to liaise closely with the relevant prescribed bodies concerning the timely delivery of essential services and infrastructure in accordance with NPO 105 of the NPF. Discussion with the newly established Housing Activation Office (HAO) within the Department of Housing, Local Government and Heritage will also be critical in terms of accelerating housing delivery by overcoming infrastructure barriers and unlocking land for development.

When considering zoning land for development that cannot be serviced within the life of the plan, the Planning Authority is advised that such lands should not be zoned for development in accordance with NPO 103 of the NPF.

The above measures will ensure that lands zoned for residential development can be developed for housing over the lifetime of the plan, creating well-connected and sustainable communities.

4. Lower tier plans

Currently, section 19 of the Act continues to apply with respect to local area 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 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 County Development 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 Planning Authority and Meath County Council is a priority. Specifically, RPO 4.11 of the RSES requires the preparation of an Urban Area Plan which will provide for a coordinated planning framework to identify and deliver strategic sites and regeneration areas so that a minimum of 30% compact growth can be achieved.

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). The Office encourages the planning authorities to liaise with the EMRA in the preparation of the Joint Urban Area Plan⁵ and to continue to prioritise the Urban Area Plan preparation.

5. 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.

⁵ Co-ordinated Area Plan under the Planning and Development Act 2024.

NPO 57 of the NPF recognises the importance of Louth's location and particularly the economic potential of the Drogheda-Dundalk-Newry network both nationally and internationally. Similarly, RPO 6.3 supports 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 with RPO 4.13 recognising the cross-border network opportunities for regional development at these locations also.

County Louth has developed a strong employment base including information and communications technology, business, professional and financial services, manufacturing, healthcare, tourism and retailing. The Office notes that the county experienced an increase in its workforce to 59,140 in 2022, an increase of 18% in the inter-census period between 2016 and 2022 which compared with a national figure of 16%⁶. Unemployment figures lowered by 28% during the same period.

As Regional Growth Centres, it will also be important that the County Development Plan incorporates measures to retain existing and attract new employers to Drogheda and Dundalk in particular and to identify ways of reducing daily net loss figures of workers from both towns (which, in 2022, totalled in excess of 11,000 workers from each town⁷). In this regard, the Office acknowledges the significant landbanks zoned for employment generating uses in Dundalk and Drogheda including at Mullagharlin, and in the north Drogheda area as well as the large employment land parcels in Ardee and Dunleer (both self-sustaining growth towns).

In relation to the future zoning of employment lands, ensuring that the economic strategy of the County Development Plan is translated into the appropriate land-use zoning proposals is an important consideration in the plan making process. The evidence base and rationale underpinning the zoning of employment uses should be clear and strategic in nature and seek to cater for the sustainable delivery and provision of employment led uses as well as supporting live-work communities. In this regard, the County Development Plan should be grounded upon an up-to-date evidence base that provides information on the existing quantum and capacity of employment lands, both developed and undeveloped as well as

⁶ <https://www.cso.ie/en/releasesandpublications/ep/p-cpp7/censusofpopulation2022profile7-employmentoccupationsandcommuting/principaleconomicstatus/>

⁷

<https://www.cso.ie/en/csolatestnews/pressreleases/2023pressreleases/pressstatementcensus2022resultsprofile7-employmentoccupationsandcommutingdublin/#:~:text=It%20was%20also%20one%20of,minutes%20between%202016%20and%202022.>

servicing information in order to fully understand future capacity requirements and to identify where shortfalls/oversupplies in provision may exist.

In this regard, the County Development Plan should include a methodology and justification in circumstances where new employment lands are proposed and/or retained from previous development plans in order to take account of any significant changes in national or regional policy in the intervening years. While this should reflect the county's enterprise/ employment profile and local characteristics, the approach should also be logical and evidence-based particularly in relation to the quantum of lands proposed for zoning and should generally follow the approach outlined in appendix A, section 1.4 of the Development Plans Guidelines.

The Planning Authority should also note the contents of the OPR Practice Note PN04 Planning for Employment Growth – The Development Plan and Employment Lands where an employment land assessment forms a critical element to informing the emerging employment strategy for the county. Within the Practice Note, section 5 comprises a step-by-step approach to assessing employment lands, providing an adaptable framework which planning authorities can tailor to create their own methodologies, dependent on available resources, local circumstances and economic profile.

The principles of compact growth and the sequential approach to zoning in relation to site servicing, access arrangements, proximity to public transport and settlement consolidation also apply to zoning for employment use. Furthermore, accessibility is a central component in identifying employment zonings and the transport provision of potential locations for new development should be considered strategically. For example, low intensity employment uses such as distribution and logistics centres will require convenient access to the strategic road network. Similarly, high intensity employment uses such as offices will require the highest level of accessibility by public transport and sustainable transport modes such as walking and cycling having regard to the obligation to mitigate climate change. With NPO 20 of the NPF there is a presumption in favour of development that can encourage more people and generate more jobs and activity within existing towns and villages.

The Office encourages the Planning Authority to be proactive in identifying sites to support economic development and employment particularly urban-led and brownfield regeneration

sites, consistent with national, regional and local policies, and in particular the principles in the section 28 guidelines on retail planning⁸ and national roads⁹.

Louth's coastline spans over 90km and provides significant opportunities for a range of marine related activities. The Planning Authority will be aware of the National Marine Planning Framework and also NPO 48 of the NPF where the County Development Plan will need to take account of and integrate relevant maritime spatial planning issues into emerging plans. The sustainable delivery of port and harbour infrastructure is supported through NPO 51 and NPO 55 of the NPF.

The forthcoming County Development Plan should set out the level of retail provision in the county consistent with the regional retail hierarchy in table 6.1 of the RSES. In this regard, the Planning Authority should also have regard to the Retail Planning Guidelines for Planning Authorities (2012), RPOs 6.10-6.14 and the RSES guiding principles for the location of trip intensive development.

6. Transport

The Issues Paper recognises the importance of County Louth's extensive transportation network, with excellent road and rail links, ports, and its close proximity to airports. As noted above 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.

Within the county, the Office notes that the completion of Phase 1 of the Port Access Northern Cross Route in Drogheda and the Mount Avenue Link Road in Dundalk have enabled the release of strategically located lands in both settlements for development.

There are a number of key projects that are in the pipeline that will directly benefit the county including the DART+ Coastal North Project for which a Railway Order was granted in August 2025 which will facilitate the DART Network from Malahide to Drogheda, significantly increasing passenger capacity on the Northern Rail Line. This project which is included in Measure INT1 of the NTA's Greater Dublin Area Transport Strategy 2022-2042 is also reflected in regional policy where RPO 5.2 of the RSES supports the delivery of such key sustainable transport projects.

⁸ Retail Planning Guidelines for Planning Authorities (2012)

⁹ Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

The Climate Action Plan 2025 (Climate Action Plan) identifies the need to significantly reduce car kilometres and increase sustainable journeys, guided by the National Sustainable Mobility Policy (2022) and the proposed National Demand Management Strategy¹⁰.

The integration of land use and transportation is a central theme of the Climate Action Plan and to the objectives and provisions of the NPF (NPO 37 alternatives to the car, NPO 43 location of new homes, NPO 69 to reduce our carbon footprint and NPO 93 air quality, among others).

53,121 people travelled to work in County Louth in 2022 with 60% driving to work, 5% travelling by bus, 1% travelling by train, 10% walking (an increase of 8% since 2016) and 2% cycling¹¹. The largest decrease in emissions occurred in transport in Q1 of 2025 compared with the same period in 2024¹². It will be important that this trend continues and that the County Development Plan incorporates measures to continue to promote more sustainable modes of transport across the county over the life of the plan.

The Planning Authority through the policies and objectives of the County Development Plan, will need to include mode share targets in order to meet the national climate targets and to meet the requirements under section 10(2)(n) of the Act. In light of this the Office encourages the Planning Authority to work with the NTA to inform appropriate and realistic mode share targets to be achieved over the plan period in order to ensure meaningful reductions in greenhouse gas emissions and energy use. In this regard the Office notes that there are a number of 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.

The Planning Authority should also take account of the transport investment priorities as set out in section 8.4 of RSES including RPO 8.10, RPO 8.11 and RPO 8.12 underpinned by section 10(2)(n) of the Act. A key issue for the forthcoming County Development Plan is

¹⁰ Actions for the Climate Action Plan 2025 reflect continuation of, and are in line with, agreed policies set out in Climate Action Plan 2023 and Climate Action Plan 2024.

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<https://www.cso.ie/en/csolatestnews/pressreleases/2023pressreleases/presstatementcensus2022resultsprofile7-employmentoccupationsandcommutinglouth/>

¹² https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA_2025Q1_Quarterly_Report.pdf

to ensure that policies maximise the benefits of existing and planned public transport investment and that planned improvements to the national road network are not eroded by a growth in demand for car travel, especially for short distances.

Commitment to the proactive implementation of the Design Manual for Urban Roads and Streets (revised 2019) in the required locations, consistent with RPO 9.10 of the RSES, will also assist in delivering sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

Chapter 8 Connectivity of the RSES includes a transport strategy and a framework for the integration of transport planning with spatial planning policies which will inform the sustainable settlement and transport strategies for your plan area, in line with section 10(2)(n) of the Act.

In accordance with RPO 8.6, LPTs will need to be prepared for Dundalk while the Office acknowledges that the LPT for Drogheda is currently being prepared with input from the NTA.

The Office advises the Planning Authority to review the extent and location of land zoned for employment, industry and commercial uses in the vicinity of all national roads and associated junctions. The co-ordination of land use and transport planning in these areas will be critical to safeguarding the strategic function of the national roads in the county and achieving objectives for compact and sustainable growth.

The Office notes that Southern Drogheda (within the County Meath administrative area) has been identified as a location for two TODs, a government initiative to deliver development at scale near public transport nodes. In the interests of consistency, the County Development Plan should acknowledge both of these TODs and include a range of supporting policies and objectives as TODs will add further growth potential to Drogheda more generally. The TODs should also be considered in the context of a joint urban area plan for Drogheda, as referenced above.

In relation to the national road network, the Planning Authority should ensure that any emerging policies in the County Development Plan are consistent with RPO 8.3 of the RSES regarding the capacity and safety of the region's land transport networks and the Spatial Planning and National Road Guidelines for Planning Authorities (2012).

7. Infrastructure

In relation to water services infrastructure, the Planning Authority will be expected 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. NPO 92 of the NPF recognises the significance of ensuring the alignment of planned growth with the efficient, sustainable development of water services infrastructure.

Infrastructure investment and priorities must be aligned with the spatial planning strategy of the RSES in keeping with RPO 4.2. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers in order to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.

In respect of surface water management, the County Development Plan should seek to maximise the implementation of Sustainable Urban Drainage Systems, in accordance with the guiding principles and objectives for surface water (RPO 10.15, 10.16, 10.17 and 10.18 of the RSES).

8. Urban Regeneration

The NPF through a range of NPOs 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. These NPOs include NPO 12 (urban places), NPO 14 (urban regeneration), NPO 15 (linking development with funding), NPO 25 (addressing vacancy and reuse), NPO 26 (proportionate growth), NPO 27 (homes in small towns and villages) and NPO 45 (increasing residential density) as well as RPO 3.3 (infill and brownfield developments) and RPO 9.8 (increased densities and CPO powers) of the RSES.

The Office commends the Planning Authority for its regeneration projects currently being progressed including the Urban Regeneration and Development Fund projects of St. Nicholas Quarter in Dundalk and the Westgate Vision in Drogheda, the Rural Regeneration and Development Fund projects including the Ardee 2040 public realm project and the Omeath public realm scheme, as well as the Town Centre First: A Policy Approach for Irish Towns (2022) (Town Centre First) plans in Dunleer and Clogherhead,

These initiatives demonstrate the Planning Authority's commitment to delivering town and village regeneration, with an emphasis on prioritising urban-led development and the regeneration of brownfield sites in order to promote compact growth as advocated by the NPF and RSES. The Office strongly advises the Planning Authority that very clear, targeted measures for further regeneration throughout the county are incorporated into the County Development Plan.

A key objective of NPO 7 and NPO 9 of the NPF is the need to achieve ambitious targets for compact growth in our urban areas. Urban regeneration and infill sites can contribute to sustainable compact growth and the delivery of new homes within the footprint of existing settlements. This will help to address NPO 7 with respect to the Eastern and Midland Region.

As part of the measures to advance brownfield development, it is expected that local authorities will purchase vacant properties through their compulsory purchase powers while also utilising such schemes as the Buy and Renew Scheme, Repair and Leasing Scheme and Croí Cónaithe Fund Scheme to maximise opportunities to return vacant properties to productive use. The Planning Authority should also seek to ensure that any new development reflects the compact growth and Town Centre First agenda which is critical to addressing climate change through reductions in the use of private transport modes, extent of green-field land take, and ineffective provision of infrastructure.

Acknowledging the housing growth targets (and additional provision) as above, the County Development Plan will need to prioritise the development of opportunity sites which are proximate to town centres, and which will assist in supporting compact growth, settlement consolidation and the identification of regeneration areas. NPO 22 of the NPF supports the use of performance-based standards for infill/brownfield development, in particular in relation to building height. Similarly, the planning authority should also take account of the section 28 guidelines related to residential densities; Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities 2024.

9. Rural Housing and Land Activation Measures

According to the latest Census information in 2022, 73% of County Louth's population live in the Regional Growth Centres of Drogheda (32%) and Dundalk (31%), the self-sustaining growth towns of Ardee and Dunleer (6%) and the self-sustaining towns of Carlingford, Castlebellingham/ Kilsaran, Clogherhead, Termonfeckin and Tullyallen (6%), with the remaining 25% residing in the small towns, villages and rural areas.

There are a number of objectives at both national and regional level to support the appropriate and sustainable development of rural communities including NPO 24, NPO 26 and NPO 28 of the NPF which should be reflected in the County Development Plan. Given the location of County Louth relative to Dublin, in particular, it will be important that the Planning Authority includes 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.

Approximately 75% of County Louth currently has access to high-speed broadband. In keeping with NPO 31 of the NPF, the Planning Authority should continue to support and facilitate the rollout of the National Broadband Plan as a means of developing opportunities for enterprise, employment, education, innovation and skills development, especially in the rural areas.

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.

In this regard, the County Development Plan's policies will need to demonstrate consistency with NPO 24, NPO 28 and NPO 29 of the NPF.

The County Development Plan will need to consider the practical implementation of appropriate policies and objectives through suitable land activation approaches and proactive facilitation of the building of homes within the footprint of rural settlements through measures such as site acquisition and serviced sites consistent with NPO 26 and NPO 27 of the NPF. These measures have the potential 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.

Funding support has been made available under the Ready to Build Scheme whereby local authorities will make serviced sites in towns and villages available to potential purchasers. The Office encourages the Planning Authority to develop existing sites in their control or purchase sites and make them available for development by providing the necessary services and access arrangements as a means of providing an alternative to housing in the

open countryside. The serviced sites scheme in Ballyroan and Durrow in County Laois supported under the Croí Cónaithe Fund Scheme provide good examples of an approach which has strong policy support in the Laois County Development Plan 2021-2027.

10. Strategic Flood Risk Assessment

The Office acknowledges and welcomes that the Planning Authority, in partnership with the Office of Public Works (OPW), is currently advancing flood relief schemes for a number of areas throughout the county. The Planning Authority should have full regard to the ongoing design, planning and implementation of a flood relief scheme in Ardee, Baltry, Carlingford and Greenore, Drogheda and Dundalk, to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures, and that a specific objective in this regard is included in the draft County Development Plan.

The Planning Authority should be aware that flood mapping produced under the National Catchment Flood Risk Assessment and Management Programme is currently under review at Bellurgan and Drogheda and that flood mapping in these areas may change as part of the review process.

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). In this regard, the Planning Authority should be cognisant of NPO 78 of the NPF where inappropriate development in areas at risk of flooding that do not pass the Justification Test should not be zoned for highly vulnerable uses. The Planning Authority is strongly advised to liaise with the OPW in relation to the preparation of the SFRA to avoid issues arising at draft plan stage.

The Office requests that the flood risk zones are overlaid on the land use zoning maps in the draft County Development Plan and that a copy of digital mapping data is made available to the Office and to the OPW to facilitate assessment.

11. Climate Action and Energy

The Planning Authority will be aware that the Office's evaluation of the County Development Plan is required under section 31AM(2)(a) of the Act to address, in particular, matters within

the scope of section 10(2)(n) of the Act. The preparation of the County Development Plan provides an opportunity for the Planning Authority to demonstrate leadership on climate action and set out local roadmaps to deliver on national emissions reduction targets.

In this regard, the forthcoming County Development Plan process should play a significant role in reducing the county's carbon footprint, through the creation of less energy and travel intensive patterns of development, facilitation of energy generation from low carbon sources, and the adaptation of communities to the effects of climate change.

The Office encourages the Planning Authority to refer to the case study paper Climate Action and the Local Authority Development Plan (2022)¹³ which sets out practical comparative information that planning authorities can learn from and use in incorporating evidence-based and realistic climate mitigation measures into their development plans.

Having regard to the Climate Action Plan and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction in carbon emissions will become central issues for planning policies during the preparation of the County Development Plan.

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 also 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.

Regarding climate change mitigation measures pertinent to section 10(2)(n) of the Act, chapter 8 Connectivity and section 8.3 Framework for the Integration of Transport Planning with Spatial Planning Policies, including RPOs 8.1, 8.2, 8.3 and 8.4 of the RSES are of relevance regarding the integration of land use and transport planning. The Planning Authority should also have regard to RPOs 8.8-8.14 of the RSES in relation to transport investment priorities.

As the Planning Authority will be aware, the commencement of section 28 of the 2024 Act came into effect on 2nd October 2025 as it relates to the review of the RSES. One of the

¹³ <https://publications.opr.ie/view-file/89>

priorities of the emerging RSES will be to allocate the regional renewable energy targets identified in table 9.1 of the revised NPF to each planning authority within the region thereby aligning with NPO 74 and NPO 75. 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. In this regard, the Office notes that as of Q3 2025¹⁴, County Louth has five connected wind farm developments with a Maximum Export Capacity (MEC) of 7 Megawatts (MW), 3 connected solar farms with a MEC of 4.5 MW and 7 planned solar farms with a MEC of 353.9 MW¹⁵. NPO 55 of the NPF should also be noted which supports offshore renewable energy developments.

In relation to the impacts of coastal change and the preparation of the County Development Plan, the Office highlights NPO 53 and NPO 54 of the NPF which require the effects of sea level changes and coastal erosion to be taken into account in planning and to support the implementation of adaptation responses to limit risks to communities and coastal ecosystems from the impacts of coastal change.

12. Education, social and community amenities

The NPF identifies access to quality childcare, education and health services as NSO 10. Population growth should therefore 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 both the Forward Planning Section of the Department of Education and the Louth County Childcare Committee to determine the requirement for additional educational and childcare provision respectively throughout the county having regard to the emerging core strategy and associated housing growth requirements (including additional provision) as set out above.

The County Louth Local Economic and Community Plan 2024-2029 and the Louth Traveller Accommodation Programme 2019-2024 should also be considered in order to provide for the co-ordinated spatial planning of housing and community services for the county.

¹⁴ Regional Development Monitor

¹⁵<https://rdm.geohive.ie/pages/6988931ceead4cb4a56498b3337023e7>

13. Implementation and Monitoring

When preparing the objectives of the County Development Plan specifically, the Planning Authority is strongly encouraged to adopt the SMART approach¹⁶ where objectives are specific, measurable, assignable, realistic and time related.

The NPF and the RSES place increased emphasis on the importance of monitoring the implementation of statutory strategies and plans to measure plan effectiveness and to continually update a relevant evidence base to inform future planning strategies.

The forthcoming OPR Practice Note PN06 Development Plan Monitoring will support planning authorities in undertaking development plan monitoring, as required by the 2024 Act and also supported by NPO 108 of the NPF. This Practice Note builds on the findings of Measuring What Matters (RTPI 2020) and the follow up workshop hosted by the Office in 2024.

The Planning Authority is therefore encouraged to set out specific provisions for monitoring the implementation of the objectives of the County Development Plan, having regard to NPO 105, NPO 106 and NPO 108 of the NPF, and the provisions of section 10 of the Development Plans Guidelines.

The Planning Authority should also implement approaches to measuring and monitoring compact growth to align with increased digitalisation of the planning system reflecting NPO 105 and NPO 106 of the NPF.

14. Summary

The Office advises your authority to take particular account of the following as part of the preparation of the County Development Plan:

- the Climate Action Plan and the objectives of the NPF and the RSES with respect to the transition to a low carbon economy and the overall reduction in carbon emissions;
- the preparation of the Joint Urban Area Plan / Coordinated Area Plan for Drogheda which should continue to be progressed with Meath County Council as a priority;
- the Housing Growth Requirements (including additional provision and the identification of Long-Term Strategic and Sustainable Development Sites/ Opportunity Areas) as set out in the Housing Growth Guidelines which should inform

¹⁶ Development Plans, Guidelines for Planning Authorities, section 5.3.

the housing growth requirements of the County Development Plan's core strategy. These measures will optimise the ability to deliver on the Housing Growth Guidelines, while recognising that a relatively significant proportion of zoned lands are not activated over the period of a development plan;

- the designation under the RSES of Drogheda and Dundalk as Regional Growth Centres which should inform where the largest proportion of the county's future housing and population growth should be directed under the Settlement Strategy for the County Development Plan;
- the need for an evidence-based assessment in relation to the distribution of further housing growth to the other settlements in the settlement hierarchy, including rural areas, to align with the Development Plans Guidelines and the RSES, including any provision for TOD under the MASP;
- the preparation of a Settlement Capacity Assessment, including an infrastructure capacity assessment, for all residential zoned land, identifying enabling infrastructure;
- the approach to residential zoning in towns and villages should be consistent with the core strategy of the plan itself, and with national and regional policy on compact growth, the sequential approach to development, and infrastructure capacity;
- the preparation of the approach to zoning for enterprise and employment uses which should reflect the economic strategy of the County Development Plan and should be grounded upon an up-to-date evidence base that relies on sound datasets and a reliable spatial analysis of different employment typologies, their location, concentration and future growth areas. An infrastructure capacity assessment should also be carried out for enterprise and employment zoned lands;
- 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;

- the 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; and
- an increased 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.

The Office looks forward to reviewing the County Development Plan as it progresses and is committed to continued positive engagement with your authority in the implementation of national and regional policies at county and local level.

Please feel free to contact 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,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations

Designated Public Official under the Regulation of Lobbying Act 2015
