

Eastern & Midland Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Main Street,
Ballymun,
Dublin,
D09 C8P5

22nd of January 2019

Dear Sir/Madam,

SUBMISSION RE: DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR THE EASTERN AND MIDLAND REGIONAL ASSEMBLY – LANDS AT NEWTOWN, MARSH ROAD, DROGHEDA, CO.LOUTH (LANDS IN THE VICINITY OF MCBRIDE STATION).

1.0 INTRODUCTION

J. Murphy Developments/Ravala Limited is the owner of c.16 hectares of land located north-east of McBride Railway station in Drogheda, County Louth. A site location map is attached. J. Murphy Developments/Ravala Limited wish to strongly object to proposed policy RPO4.8 (Employment hub at and in the environs of McBride Station) of the draft RSES as it relates to its lands. In this regard, the landowner has retained Stephen Ward Town Planning and Development Consultants Limited to make this submission on its behalf.

This submission relates to policy RPO4.8 as it relates to Drogheda and specifically the proposed designation of lands at McBride Station and environs as an “employment hub”. It is submitted that the designation by the draft RSES of this area as “employment hub” is inappropriate and contrary to the policies of the National Planning Framework and other Ministerial Guidelines and is not in the interests of the proper planning and sustainable development of the area as will be set out in this submission.

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It is strongly contended that that proposed policy RPO4.8 as set out in the Draft Strategy sets the Strategy so far against other provisions in the Draft Strategy and National policy to the extent that if not altered policy RPO4.8 would lead to the document being internally conflicted to such an extent as to unravel many of the other policies and provisions of the Draft. Furthermore, it is contended that in order to align with national policy and ministerial guidelines the policy as it relates to McBride Station and environs must be changed.

The submission concludes with suggested wording and justification for a revised policy as it relates to McBride Station and environs. The revised wording proposed is –

“Facilitate the regeneration of lands at McBride Station and environs as a mixed use residential and employment hub with supporting uses to capitalise on existing and planned public transport infrastructure, including the DART expansion programme whilst avoiding development that detracts from the town centre”.

2.0 THE ‘MCBRIDE STATION’ POLICY IS IN CONFLICT WITH LOCAL PLANNING POLICY - LIHAF FUNDING

Our client wishes it to be noted that its lands to the north-east of McBride train station are the subject of a Strategic Housing Development proposal (ABP. Ref. 302215-18). The proposal has completed the ‘pre-application’ stage and the formal SHD application is due to be lodged with An Bord Pleanála in early 2019. Central to this planning application is the provision of an access road with funding approved under the Local Infrastructure Housing Activation Fund (LIHAF). The SHD proposes a net residential development of 61 dwellings per hectare including 345 apartments and 36 duplex apartments along with 75 houses. Planning permission was granted for this road together with a further 133no. houses under P. A. Ref. 17/387 on adjoining lands also in the ownership of J.Murphy Developments/Ravala Limited. These lands are also identified on the site location map attached.

The funding for this road is dependent on the provision of 260 dwellings by 2021. This project has been awarded funding on the basis that the provision of the proposed infrastructure will provide housing at significant scale at a strategic location. According to the description of LIHAF Projects (March 2017), this project “will open up zoned residential lands for development in close proximity to Drogheda Town Centre and Drogheda railway station”. It is acknowledged that initially the approved road will enable to provision of 260 residential units with the potential for a further 500 residential units.

It is submitted that proposed policy RPO 4.8 as it relates to McBride Station and environs is in direct and material conflict with the LIHAF proposals and that as proposed the policy would result in the loss of the LIHAF funding. Furthermore, J. Murphy Developments/Ravala Limited has worked closely with the Planning Authority over the last number of years and has invested considerable sums in the reasonable expectation that its lands would be developed for mixed use wherein residential would be a significant component.

The proposed Strategic Housing Development will provide 456no. residential dwellings in phases in addition to supporting employment uses including local neighbourhood services and uses such as cafes and restaurant as well as small scale shops to serve the development as well as commercial and office accommodation. This is fully compliant with the zoning objective of the Drogheda Borough Council Development Plan 2011-2017 (as amended and extended) and confirmed in the Notice of Opinion issued by An Bord Pleanala in relation to the proposed SHD application on the lands. Since its designation in 2005, and subsequent extension in 2011, the Drogheda Transportation Development Area (DTDA) has been envisaged as a high density mixed use area with residential development as a significant component. Indeed, even pre the 2011 Development Plan this area was envisaged as an area for residential development and associated uses.

It is submitted it is in the best interest of the sustainable development of this area to allow for a mix of uses including high density residential development to support the investment in the LIHAF road which is dependent on the provision of housing and the creation of a new urban neighbourhood that will provide appropriate critical mass to support the transportation network and future expansion of DART services to Drogheda.

The National Development Plan states *“Under the Local Infrastructure Housing Activation Fund (LIHAF), lands with the potential to make a significant contribution to increasing and accelerating the supply of new homes have been identified, particularly in and around urban areas”* (p.35). Where a project does not meeting key project milestones, the Department will reserve the right to withdraw funding from that project.

The Draft RSES states *“There is a need now for accelerated delivery of housing, particularly in Dublin and identified growth settlements in the Region”* (p.162). Drogheda is an identified growth settlement.

Louth County Council	Newtown Drogheda	€1.2m
<p>Public Infrastructure:-</p> <p>The proposed public infrastructure includes:-</p> <ul style="list-style-type: none"> - Access Road <p>Housing Delivery:-</p> <p>This proposal relates to the construction of a new access road which will open up zoned residential lands for development in close proximity to Drogheda Town Centre and Drogheda railway station.</p> <p>The proposed access road will be 600m in length and is required to facilitate the development of 260 residential units on a 12.7 acre site. It will also allow development of a further 19.3 acres which could potentially yield a further 500 residential units.</p>		

Figure 1: Extract from LIHAF – Project Descriptions (28th of March 2017)

3.0 THE 'MCBRIDE STATION' POLICY IS CONTRARY TO POLICIES OF NATIONAL PLANNING FRAMEWORK

The primary objective of the draft RSES is to support the implementation of the National Planning Framework (para. 12.1).

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

According to the NPF, Ireland's future homes will:

"be located in places that can support sustainable development -places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change" (p.92, NPF)

Under the National Planning Framework, the Government will support: *More energy efficient development through the location of housing and employment along public transport corridors, where people can choose to use less energy intensive public transport, rather than being dependent on the car (p.120, NPF).*

The allocation of funding under LIHAF clearly acknowledges the strategic importance of our client's lands for the provision of housing. It is proposed to provide the necessary housing to support the provision of the access road as part of a mixed use development within walking distance of the train station via McGrath's Lane.

4.0 THE 'MCBRIDE STATION' POLICY CONFLICTS WITH OTHER POLICIES AND OBJECTIVES WITHIN THE DRAFT RSES

4.1 Integrated Land-use Planning and Public Transport

It is of fundamental importance that the distribution of activity (for example where people live and work) is planned in a manner which reduces the need to travel and achieves a move towards a low carbon society having regard to the impact which transport has on carbon emissions (p.138).

RPO 8.1: The integration of transport and land use planning in the Region shall be informed by the guiding principles expressed in the transport strategy of the draft RSES.

Guiding Principles for Integration of Land Use and Transport as per the transport strategy (Within Chapter 8 of the Draft RSES) state:

- For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised (p.145).*

- *Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools (p.145).*

4.2 Promoting Compact, Sequential and Sustainable Growth

Policy RPO 4.8 of the draft RSES aims “...to ensure it achieves targeted compact brownfield / infill growth of a minimum of 30%” in Drogheda through the preparation of a Joint Urban Area plan.

It is submitted that this policy is contrary to the Compact Growth Strategy promoted by the National Planning Framework (NPF) and Draft RSES for settlements of regional importance, including Drogheda.

According to Section 9.5 of the Draft RSES, “*One of the key elements of the NPF relates to the need for compact growth, with development being focussed within and close to existing built-up areas*” (our emphasis). The regeneration of infill and brownfield sites is just one element of this policy.

An overview of the NPF Strategy at Section 2.2 summarises Compact Growth as “*Targeting a greater proportion (40%) of future housing development to be within and close to the existing ‘footprint’ of built-up areas* (p.22) (our emphasis).

According to the NPF, it is a Key future planning and development and place-making policy priority for the Eastern and Midland Region that “*A focused approach to compact, sequential and sustainable development of the larger urban areas along the Dublin – Belfast economic and transport corridor, along which there are settlements with significant populations such as Dundalk and Drogheda*” (p.35).

The Growth Strategy for the Region illustrated at Section 3.1 of the Draft RSES includes “*Targeting a greater proportion of future housing development (up to 50% in Dublin, up to 30% in other towns) to be accommodated within and close to the existing built up urban areas* (p.27)

It is a Regional Policy Objective (RPO 9.9) to achieve Compact Urban Development as follows-

It is a regional policy objective (RPO 9.9) that “*Local Authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and at least 30% of all new homes within or contiguous to the built-up area of metropolitan settlements within the wider Dublin metropolitan area*”.

International best practice recognises that the regeneration and redevelopment of infill and brownfield sites at any time is in keeping with the principles of sustainable development. However, the potential yield of residential units from such sites is unpredictable and should be viewed as a windfall and not a planned contribution to housing supply.

It is submitted that the intention of compact growth is to avoid 'leapfrogging' of development and to ensure settlements develop in a compact, sequential and sustainable manner. Policy RPO 4.8 and related policies should promote 30% of future housing within and close to the existing built up urban area with the continued promotion of brownfield lands in the identification of regeneration areas. It is submitted the contribution of brownfield and infill sites should not be considered in terms of future housing yield in an identified growth centre.

The DTDA lands, including our client's lands are towards the inner core of Drogheda, well within the urban envelop and on zoned and serviced lands. The lands are clearly sequential to existing urban area.

4.3 No Other Similar Designation in the Draft RSES

McBride Station policy is the only such policy in the Draft RSES. This it is submitted is of itself an internal conflict in the Strategy. There are many rail stations in the region yet none other than McBride station are deemed appropriate for a mono-use employment proposal. Table 4.3 of the Strategy sets out the transport profile for the Regional Growth Centres stating – “Self-sufficient settlements with higher rates of internal trips and public transport connections to Dublin and other centres”. The Policy Response is stated as – “Key drivers of regional economic growth aligned with significant rates of population growth, coupled with investment in services, amenities and sustainable transport”.

The DTDA lands including lands within our client's ownership are clearly suitable for residential development in accordance with all existing national, regional and local planning policy guidance, including Ministerial Guidelines. The RSES must be consistent with Ministerial Guidelines issued under S28 of the Planning and Development Act 2000 as amended. Policy RPO 4.8 as it relates to McBride station, if adopted, would be in direct and material conflict with the proposed transport strategy as contained at Chapter 8 of the Draft RSES and as restated above. The proposed 'McBride Station' policy, by proposing a mono-use land-use allocation i.e. employment, excludes the possibility of mixed use development including residential within easy walking distance and in direct proximity to a major public transport interchange in the central area of Drogheda. It is impossible to reconcile the Draft "Guiding Principles for Integration of Land Use Transport" at Pg145 of the Draft RSES with policy RPO 4.8 at Page 49 as it relates to McBride Station and environs. One provision clearly advocates residential development in proximity to transport interchanges and the other policy proposing to exclude such uses from the only rail interchange facility serving the town.

5.0 THE 'MCBRIDE STATION' POLICY CONFLICTS WITH MINISTERIAL GUIDELINES

Below is a summary of the main Guidance documents that the proposed policy is in conflict with.

5.1 Urban Design Manual: Prioritising use of public transport over private cars is a primary departmental objective. According to the Manual, the sequential approach to the development of zoned lands gives preference to lands closest to the core and public transport routes. In order for a public transport system to operate effectively, it will need to serve routes with an adequate carrying capacity of passengers. Low density districts often find it difficult to support a good public transport system (p.25).

One of the main arguments in favour of higher density residential development is their ability to support more sustainable transport modes. Additionally, higher density developments can help to create more compact settlement patterns that help to support walking and cycling. (p.25)

The provision of a higher density mixed use development will assist in the achievement of a compact settlement pattern and support the existing and expanding services at McBride Train Station.

5.2 Sustainable residential development in Urban Areas – Guidelines for Planning Authorities (2009): This document aims for successful and sustainable residential development in urban areas. To this end, it is required to-

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Provide a mix of land uses to minimise transport demand (para. 1.9)

A key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land and of investment in public transport. Such policies will help to sustain viable local services and employment (para. 3.1).

5.3 Sustainable Urban Housing: Design Standards for New Apartments: This Document advocates particularly suited locations for apartment are existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services (para. 2.2).

The subject lands are within walking distance of McBride Train Station via McGraths Lane and in close proximity to Drogheda Town Centre and associated facilities as well as the River Boyne and the associated coastal amenities of Mornington and Bettystown. This location is clearly suitable for residential development as identified by the Guidelines.

The Guidelines define Central and/or accessible urban locations as including “sites within reasonable walking distance to/from high capacity urban public transport stops (such as DART or Luas)” (para.2.4).

It has been confirmed that the DART will be extended to Drogheda. The subject lands are within walking distance of McBride Train Station via McGraths Lane. There is also a clear opportunity to connect the development in a south-westerly direction to the Station.



Figure 2: Proximity of submission lands to McBride Train Station and Drogheda Town Centre

3.4 Urban Development and Building Heights - The Minister in his introduction states *“we need to shift away from energy intensive “business as usual” development patterns and create more mixed, more dynamic and more sustainable cities and towns”*.

The Guidelines state that in order to meet the challenges set by NPO 13 of the NPF, it is required to secure an effective mix of uses. *“In particular, there is a need to support the development of a balance of uses within our urban centres (e.g. living, working, leisure), rather than focusing on just one or two uses that we are seeing in the development of some parts of our city centres, where offices are more frequently constructed than the homes that communities and economies also need, or in our suburbs that are predominantly residential and whose development in ever-extending outward arcs will necessitate more and longer travel to work, car-based mobility and a loss of quality of life as a result”* (para. 1.19).

It is clear that national policy and Ministerial Guidelines support the provision of mixed use development that prioritises sustainable modes of transport. It is submitted the proposed ‘McBride Station’ policy will contribute nothing and if anything accentuate commuting by private car in the area. People wanting to travel to Dublin by train will still have to travel to McBride station. Indeed, by excluding residential development as an acceptable use at or in the vicinity of McBride Station, the policy will contribute to unsustainable development patterns, casting aside a major opportunity to create a new high density residential development opportunity within easy walking distance of the town centre and the rail station. Thus increasing the requirement for additional lands for residential development at peripheral locations, leading to additional private car commuting as people travel from these peripheral locations to the town centre and to McBride station.

An employment hub at this location would result in the displacement of development to suburban locations and result in the 'leap-frogging' that policy is planning against and would be contrary to achieving the objective of increased proximity of new homes and employment which is a central theme of the National Planning Framework.

A mixed use development area where residential and employment are encouraged would not in any way inhibit or discourage "reverse" commuting.

6.0 AVAILABILITY OF EMPLOYMENT LAND IN THE AREA AND IN WIDER DROGHEDA AREA

The draft RSES identifies the following guiding principles to identify locations for strategic employment development. We set out below the guiding principles and comment under each one -

Planning to accommodate strategic employment growth at regional, metropolitan and local level should include consideration of:

- *Location of Technology and Innovation Poles - Institutes of Technology (IoTs) and Universities, as key strategic sites for high-potential growth of economic activity*

The closest third level institute in Drogheda is located on the north site of the town (Drogheda Institute of Further Education). Dundalk is the closest Institute of Technology.

- *Current employment location, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises*

There is no significant synergy between the subject lands and major blocks of employment zoned lands elsewhere in Drogheda. The provision of the approved access road is depended on funding under LIHAF which requires the provision of 260 residential units by 2021.

- *Locations for expansion of existing enterprises*

IDA Park – lands are available here for employment development. It is submitted the addition of the submission lands as employment lands would have no effect on commuting patterns. There is already sufficient employment land available in Drogheda. The bigger problem is that no large-scale employers have located in Drogheda. Given topography and location of the submission lands, they would be prohibitively expensive to development for large floorplate buildings and most certainly could not possibly compete with areas such as the IDA Business Park. To pursue mono-use employment on these lands would simply result in them languishing undeveloped for financial and economic reasons.

- *Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability*

Mix use zoning allows for employment uses that are compatible with residential development and make efficient use of the strategic location of the DTDA lands – data centres or other such uses would be a very inefficient use of this centrally located landbank.

- *Locations for potential relocation of enterprises that may be better suited to alternative locations and where such a move, if facilitated, would release urban land for more efficient purposes that would be of benefit to the regeneration and development of the urban area as a whole, particularly in metropolitan areas and large towns*

Mixed use development is the most efficient use of land in this location. Mixed use development allowing residential and employment would be far more efficient than mono-use employment zoning.

- *Within large urban areas locations where significant job location can be catered for through infrastructure servicing and proximity to public transport corridors.*

There is sufficient serviced employment areas in the Drogheda urban area e.g. IDA Park and industrial estates. As stated, the difficulty is not with the amount of land zoned but with the occupation of this land for employment purposes.

It is submitted there are more than adequate lands in the area around McBride Station and in the wider Drogheda urban area that are already zoned for uses that would facilitate employment uses of all scales, whether large or small. These are illustrated on the attached plan. For example, the area between the existing Scotch Hall development and the viaduct has an extant permission for c.36,000sq.m of development. A second area on the south side of the Marsh Road extending to 22.5 hectares and immediately adjoining our client's lands is already zoned for employment uses. There are also extensive and unoccupied / underdeveloped employment zoned lands in the Drogheda area. These are also identified on the attached map.

Given the availability of large tracts of zoned lands where employment is an acceptable use, not only at and in the vicinity of McBride Station (north quays and lands south of Marsh Road for example), it is submitted there is no justification to designate McBride Station and all lands in the vicinity for a single mono-zoning employment use. As noted, it is submitted this represents a real loss of opportunity for high density mixed use development including residential and employment.

7.0 SUMMARY

It is submitted the proposal within policy RPO 4.8 of the Draft RSES for mono-use employment allocation at and in the vicinity of McBride Station in Drogheda is contrary to national, regional and local planning policy, including Ministerial Guidelines and would not be in the interests of the proper planning and sustainable development of the area.

It is submitted the area north-east of the station (north of McGrath's lane is better suited to a mixed use development area wherein both residential and employment are encouraged. We suggest the following amendment to the 'McBride Station' policy at Policy RPO 4.8 of the Draft RSES as follows –

“Facilitate the regeneration of lands at McBride Station and environs as a mixed use residential and employment hub with supporting uses to capitalise on existing and planned public transport infrastructure, including the DART expansion programme whilst avoiding development that detracts from the town centre”.

It is submitted the designation as proposed in the draft RSES is inappropriate for the following summarised reasons –

- The lands north-east of the station are presently designated for residential use and have LIHAF funding in place with the aim of releasing the lands for residential development. In the event the area is allocated for mono-use employment then the LIHAF funding will be lost.
- In keeping with current zoning (where residential use is facilitated and following SHD pre-planning with An Bord Pleanala, the submission lands north-east of McBride train station are the subject of a Strategic Housing Development proposal (ABP. Ref. 302215-18). The formal SHD application is at an advanced stage of preparation and is due to be lodged with An Bord Pleanala in early 2019. The application will also be subject to EIA.
- The 2011 Drogheda Development Plan designates the Drogheda Transportation Development Area (DTDA) as a high density mixed use area with residential development as a significant component. Indeed, even pre the 2011 Development Plan this area was envisaged as an area for residential development and associated uses.
- It is submitted the proposed mono-use employment designation at McBride Station is in direct and material conflict with other policies and provisions of the Draft RSES as well as national Ministerial Guidelines. For example, the draft RSES promotes integrated land-use planning and public transportation as well as compact, sequential and sustainable growth. In keeping with national policy, it promotes high density residential development close to public transport facilities. National guidelines promote a move away from single use mono-zoning and also strongly promote high density residential development in proximity to public transport facilities.
- This submission demonstrates there is adequate land zoned for employment both in the vicinity of McBride Station and in the wider Drogheda area. The bigger problem is that no large-scale employers have located in Drogheda. The planning system can only ensure adequate land has been made available. It is for others to bring employers to the area. It is submitted the best way to reduce the residential to employment ratio in Drogheda is not to simply zone more employment land, rather to get major employers to occupy the employment land that is already appropriately zoned.

- It is submitted the proposed designation at McBride Station and environs would not generate “reverse commuting” patterns. It is submitted the concept is not applicable to the urban relationships on the Dublin – Belfast corridor rather it relates to commuting from Mega-cities to the suburbs. The draft RSES notes the Dublin Belfast economic corridor as the “*largest economic agglomeration on the island of Ireland*”, stating “*growth enablers for the Dublin Belfast corridor include – “Compact and focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale”*. In terms of commuting patterns, statistics from the Census 2016 main EDs for the settlement of Drogheda show Louth and Meath to be the top two destinations for commuters with Dublin City coming third.
- Given topography and location of the submission lands, it would be prohibitively expensive to develop for large floorplate buildings and most certainly could not possibly compete with areas such as the IDA Business Park in terms of location and construction costs. To pursue mono-use employment on these lands would simply result in them languishing undeveloped for financial and economic reasons.

Yours faithfully,



Stephen Ward



— Approximate land ownership boundaries

Map 1: Site Location Map



Map 2: Proximity of submission lands to Drogheda Town Centre and Train Station

DROGHEDA BOROUGH COUNCIL

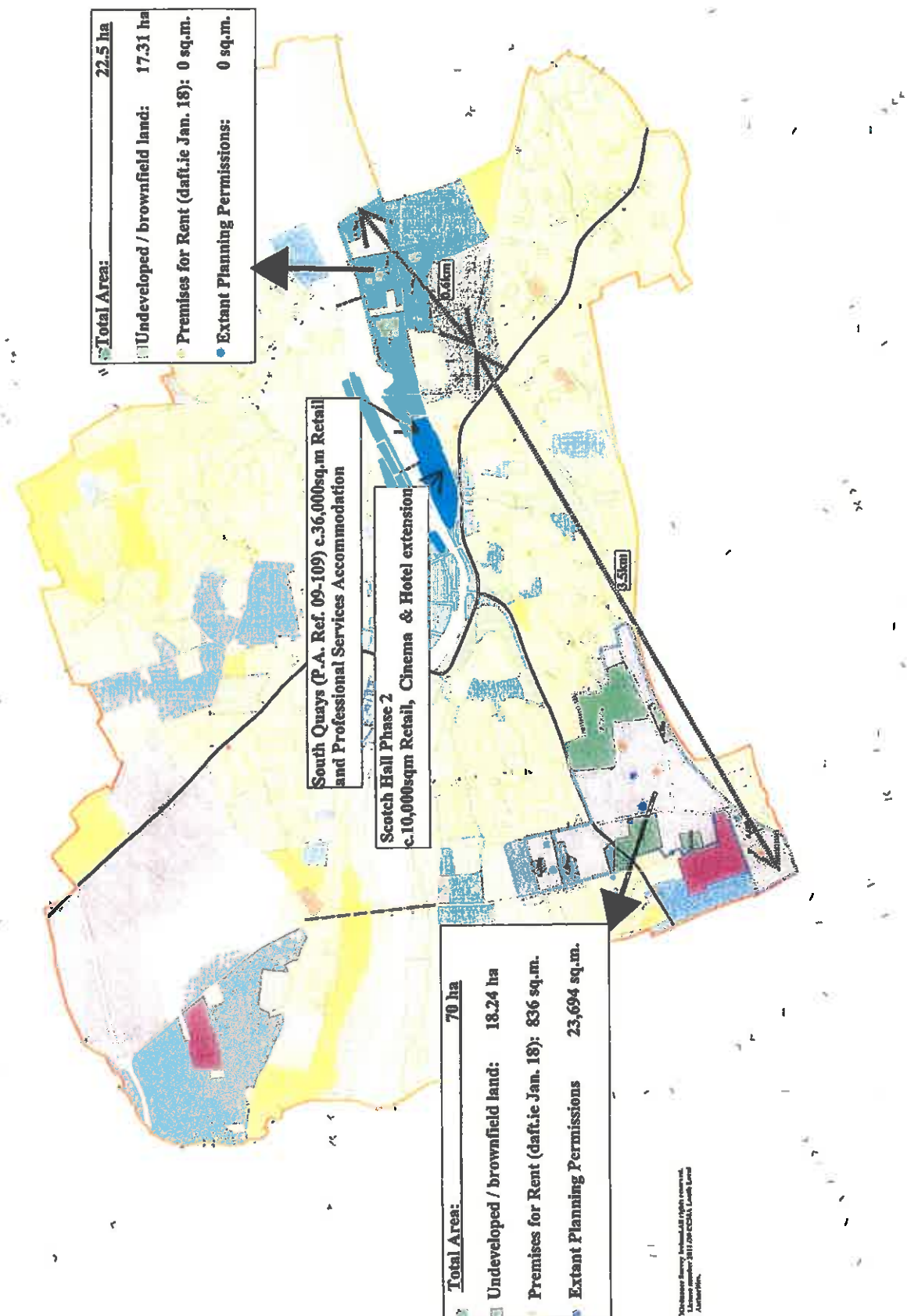
**LAND USE ZONING OBJECTIVE MAP
ZONING OBJECTIVES**

- REL. Residential (Single Dwellings) - Areas zoned for the use of single dwellings.
- RN. Residential (Neighbourhood) - Areas zoned for the use of single dwellings, with a mix of housing types and densities.
- TC. Town Centre - Areas zoned for the use of shops, offices, public buildings, and other town centre uses.
- TCd. Town Centre (Development) - Areas zoned for the use of shops, offices, public buildings, and other town centre uses, with a focus on development.
- RP. Residential (Professional) - Areas zoned for the use of professional services, offices, and other business uses.
- EGZ. Employment (General) - Areas zoned for the use of a wide range of employment uses.
- BP. Business (Professional) - Areas zoned for the use of professional services, offices, and other business uses.
- CC1. Community (Community) - Areas zoned for the use of community facilities, public buildings, and other community uses.
- NRO. Neighbourhood (Neighbourhood) - Areas zoned for the use of single dwellings, with a focus on neighbourhood development.
- DTDA. Development (Development) - Areas zoned for the use of a wide range of development uses.
- NC. Neighbourhood (Neighbourhood) - Areas zoned for the use of single dwellings, with a focus on neighbourhood development.
- LRP. Local (Local) - Areas zoned for the use of local services, shops, and other local uses.
- OS. Office (Office) - Areas zoned for the use of office spaces.
- DC. Development (Development) - Areas zoned for the use of a wide range of development uses.

**DROGHEDA BOROUGH COUNCIL
DEVELOPMENT PLAN 2011-2017**

COMMISSIONED BY: DROGHEDA BOROUGH COUNCIL
 CONSULTANTS: STEPHEN WARD TOWN PLANNING AND DEVELOPMENT CONSULTANTS LIMITED
 DATE: 15/01/2011
 DRAWN BY: J. L. O'NEILL
 CHECKED BY: J. L. O'NEILL
 APPROVED BY: J. L. O'NEILL

Scale: 1:10,000
 Date: 15/01/2011



Map 3: Analysis of availability of Employment Lands in Drogheda
 Stephen Ward Town Planning and Development Consultants Limited

