

Heather Cooke

From: Brian Hughes <[REDACTED]>
Sent: 23 January 2019 16:43
To: RSES
Subject: Submission by Drogheda City Status Group
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Follow Up Flag: Follow up
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Dear Sir/ Madame,
On behalf of the Drogheda City Status Group, I attach our Submission to EMRA.
Kindly acknowledge.
Yours sincerely,
Brian P Hughes

[REDACTED]

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23rd January 2019

RSES Submission on behalf of the Drogheda City Status Group

- Evidence confirming Drogheda's City Status:

Overview: *The CSO population projections to 2051 under the NPF to 2040 are very conservative. From an Expert Group prospective, the more recent work being done on the CSO Regional Projections point to more ambitious set of growth projections as likely to apply, particularly for the eastern half of the State. Accordingly, population growth in excess of 1.6% per annum compound should be provided for in the RSES Plan, in line with its 2002-2016 population growth performance.*

1. Plan Recognition: It is welcomed that Drogheda's position as a regional centre is recognised and imperative that its position is not watered down in the final RSES Plan. Instead, the Drogheda City Status Group (DCSG) await Drogheda's designation as Ireland's next city.

Studies and reports in recent years relevant to this submission include:

(a) The Drogheda Boundary Review

The main recommendation of this Review recommended no change to the boundary, but instead, proposed enhanced collaboration between Louth County Council and Meath County Council

This has been a spectacular failure, as confirmed by the response to a PQ recently submitted by Senator Ged Nash). The outcome of this Review has resulted in Drogheda remaining as effectively TWO TOWNS rather than becoming ONE CITY – with all the administrative inefficiencies and lost opportunities that entails.

In [REDACTED] [REDACTED] were in different planning regions. Now that they are both in the EMRA, this facilitates “transcending” [REDACTED]

[REDACTED]

(b) The National Development Plan (Draft – prequel to Ireland 2040)

Drogheda – Ireland’s largest town, on track to become the next city – was completely ignored in this draft report, which in the North East only focussed on the Dundalk-Newry axis. In the near future, Drogheda will be the EU city closest to the EU: UK land border. To exclude it from the draft plan was inexcusable.

[REDACTED] [REDACTED]

(c) Ireland 2040

This document only projected population growth for the current five cities of Dublin, Cork, Limerick, Galway and Waterford. Despite Drogheda’s rapid growth, no attempt was made to project population growth there, which will see it achieve city status (based on the 50,000 population criteria as set out by the Government and EU) in the near future.

That city status will also be achieved by the development of the “Northern Environs Plan,” which is of national importance in responding to the current housing crisis by providing thousands of more affordable homes as well as local employment; retail and leisure facilities and the possibility of a Drogheda North Railway Station and mass transport hub, creating the possibility of a “Linear City” running from Gormanston/ Laytown to the south to Drogheda North. Again, this major development plan (now even more relevant given the urgency of addressing climate change) was completely ignored in the Ireland 2040 Plan.

A key enabler for the Northern Environs Plan is the proposed Northern Cross Route which would allow access to the assigned area for housing and other development which was planned over a decade ago. This would also create a faster route for commercial traffic to access Drogheda Port, alleviating the need for this traffic to be routed through the town centre, eliminating noise and air pollution; road safety and congestion issues there.

This Plan also ignored the adjacent agglomeration of Laytown-Bettystown-Mornington (LBM) – which in the 1980s became a town in its own right, and, using current EU criteria is fused and seamlessly connected to Drogheda, thus adding momentum to the evolution of Drogheda as the first city in the North East and a second and new city in the EMRA. While recognising the South/North Drogheda-Dundalk-Newry axis, it has failed to recognise the

equally important East/West axis where Drogheda’s current and future role as the major Regional Centre in the North East extends well into counties Meath; Cavan and Monaghan as well as Louth and North Co. Dublin.

Living within a twenty five mile catchment of Drogheda, there are circa 750,000 citizens, making it a centre serving a larger 25 mile catchment population than some of the current cities. To the north, the town of Dundalk serves circa 125,000 citizens within a similar 25 mile catchment, as well as circa 125,000 subjects of the UK in Northern Ireland. So, Drogheda has six times more citizens within a 25 mile radius than the smaller town of Dundalk.

After Dublin, the Rest of Leinster (RoL) in 2016 is effectively the State’s next largest ‘Province’ –see configuration in Table 1, thus:

Table 1: Provincial Populations - Recent Growth Performances

5 Provinces:	Census 2011 Populations	Census 2016 Populations	2011-2016 pop. growth contributions	5-year % growth	% of State surface area	% share of Population growth
Dublin	1,273,069	1,347,359	74,290	5.848%	1.35	42.79%
Rest of Leinster	1,231,745	1,287,044	55,299	4.49%	27.26	31.85%
Munster	1,246,088	1,280,020	33,932	2.65%	35.12	19.54%
Connacht	542,547	550,688	8,141	1.50%	24.74	4.69%
Ulster (part)	<u>294,803</u>	<u>296,754</u>	<u>1,951</u>	<u>1.12%</u>	<u>11.53</u>	<u>1.83%</u>
Ireland	4,588,252	4,761,865	173,613	3.70%	100.00	100.00%
Source: Brian Hughes analysis of CSO 2011 Census and 2016 CSO Census Data						

It is noted that Munster, as the third most populous Province, has three regional cities and Connacht has Galway

In a modified RSES settlement hierarchy, (per Christaller 1933) should have at least one regional city on demographic proportionality grounds, preferably located in the ‘Hinterland’ band of the E&M Administrative Region – see below re population carrying capacity

The evidence-base of this Submission shows Drogheda-LBM as being this settlement, both in terms of size and growth performance, see Table 2. Accordingly, it is grouped with the five cities instead of with the four designated towns because of its growth and size.

**Table 2: National Planning Framework
Cities and Regional Growth Centres**

1996-2016

The ten NPF-Designated Centres:

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City and Town Population Growth Comparisons:

Timeframe

Timeframe

1996-2016:

2011-2016:

The ten NPF-Designated Centres:

Population

<u>Cities:</u>	<u>1996</u>	<u>2016</u>	<u>Growth</u>	<u>% Growth</u>	<u>2011</u>	<u>2016</u>	<u>Growth</u>	<u>% Growth</u>
Dublin	952,692	1,173,179	220,487	23.14%	1,110,627	1,173,179	62,552	5.63%
Cork	179,954	208,669	28,715	15.96%	198,582	208,669	10,087	5.08%
Limerick	79,137	94,192	15,055	19.02%	91,454	94,192	2,738	2.99%
Galway	57,363	79,934	22,571	39.35%	76,778	79,934	3,156	4.11%
Waterford	44,155	53,504	9,349	21.17%	51,519	53,504	1,985	3.85%
Drogheda-LBM	28,960	52,828	23,868	82.42%	49,467	52,828	3,361	6.79%

Towns:

Dundalk- Blackrock	30,195	39,004	8,809	29.17%	37,816	39,004	1,188	3.14%
Athlone	15,544	21,349	5,805	37.35%	20,153	21,349	1,196	5.93%
Letterkenny	11,996	19,274	7,278	60.67%	19,588	19,274	-314	-1.60%
Sligo	18,509	19,199	690	3.73%	19,452	19,199	-253	-1.30%

**Source: CSO, 1996 and 2016
Censuses, per Brian Hughes**

The State population increase (1996-2016) was 31.32%.

2. Government Undertaking:

At the Launch of the NPF in NUIM, on 2nd February 2017, Tainaiste Coveney, accompanied by his Junior Minister, confirmed to the Drogheda City Status Group (DCSG) and to this writer, that if the appropriate evidence was forthcoming, he would be happy to respond positively to a formal Petition (it had not yet been submitted as at that 2017 date).

That Petition, endorsed with thousands of signatures, was subsequently submitted and is still in the process of being considered by Government

The EMRA Regional Authority area is that of Leinster, excluding the aggregate 305,886, as per the 2016 census population for Kilkenny, Carlow and Wexford counties.

Since the 2016 Census, it is no longer correct to separate Drogheda from its agglomeration with LBM, given the fusion of the two settlements and the ongoing housing momentum.

Both are detailed hereunder, in this Study's Population Grid Analysis and as summarised for the ongoing programmes of development , both north and south of the river Boyne.

For no apparent reason LBM was excluded from the National Planning Framework's Appendix listing of Settlements and in that document of all town settlements: Ireland's 34th largest town apparently does not exist!

On a population per square kilometre basis, Drogheda and LBM have agglomerated

Their fusion is at a much higher density per square kilometre than Dundalk with Blackrock

No one from the DCSC would deny that Blackrock de facto, is Dundalk's south eastern suburb or that it comprises about 6,500 of the Dundalk 39,004 population

However, their 18-hole golf course at Haggardstown dilutes the relevant linking Dundalk-Blackrock densities down to c. 400 per sq.km., i.e. to below the minimum EC 'intermediate' density of 500, as specified in the Dijkstra and Poelman (2014) Working Paper 01/2014 under the EU's Directorate General for Regional Affairs, DG Regio, Brussels

LBM likewise, is Drogheda's south eastern suburb, on uninterrupted density grounds, as detailed hereunder

In the 2016 populations: Drogheda-LBM = 52,828 and Dundalk-Blackrock = 39,004

Accordingly, Drogheda-LBM is 35.45% more populous than Dundalk-Blackrock in 2016 and furthermore, is both more extensive and dense

The State and RoL's largest settlement is due to be examined for the respective criteria, as a city under WP 01/2014 of the EU Regio Directorate General (EUDG), where DCSC have recently received a positive and welcoming written response therefrom

Drogheda-LBM is less diffuse, with much higher linking densities per sq. km., [this is the basis for this independent evaluation by the ECs EUDG for Regional and Urban Policy]

Accordingly and awaiting the independent assessment, Drogheda-LBM already conforms to being a city, in as per these EU DG's Dijkstra and Poelman (2014 and 2015) criteria

Parallel to this, the DCSC's formal Petition for City Status is currently before Government, backed up with its thousands of citizens' signed formal Petition and with local politicians' endorsement from the three LEAs that make up its territory

Furthermore, the DCSG is now discussing these matters with the Leaders of the State's main political parties, in recognition of the fact that whereas the demographic criteria have been satisfied, the 'Governance' issue of city confirmation and designation remain to be resolved

For the near three years post the 2016 Census, demographically and with a much higher rate of new housing completion, Drogheda-LBM is now believed to exceed Waterford's current population

Drogheda-LBM, over both five year (2011-2016) and twenty year (1996-2016), has grown faster (both population and percentage wise) than **all** other of the Irish cities or towns, with the exceptions of Dublin and Cork, vide Table 2, above.

Accordingly, in the forthcoming 2021 Census Drogheda-LBM will have replaced Waterford as the State's fifth city

Galway became the State's last city in the 1980s, in the precedent, wherein it had then exceeded Waterford's population

Its 2011-2016 growth of 3,361 is also 85% greater than **the aggregate** of the four RESE designated towns growth of 1,817, vide Table 2

The Drogheda-LBM agglomeration is also physically reinforced by the new Waste-water treatment plant on the Marsh Road, catering for a 100,000 population, which serves the former Borough together with the adjoining Louth and Meath Rural Areas.

In aggregate, this Greater Drogheda Area's combined population had grown by almost 80% in twenty years 1996-2016 to reach over 84,000: at a scale-size that is more than twice the population of Longford County (i.e. the former Borough+Louth and Meath Rural District EDs)

Likewise this fusion is confirmed by the District-level Shopping Centre at Southgate, by major and ongoing residential developments at Grangerath, Bettystown Cross, Donacorney - all served by the major waste-water treatment plant and extensive pipe network

Furthermore, the agglomeration is confirmed by the establishment of other Central Place facilities, including new schools, creches (and some Services, Industries – despite the IDA and Enterprise Ireland focus on Dundalk)

The referred to evidence-base Tables 1 and 2 on the applied demographics confirm the following analysis.

3. Comparative Analysis:

Drogheda City Status Committee refutes the incorrect, contrived observation of the Draft RSES document, which states that Drogheda and Dundalk are of similar size. Given the detailed evidence of this Study, it is incredulous for that Draft's text to assert that Drogheda (as with Dundalk), might attain a city-level population of 50,000 by 2030, **wherein Drogheda-LBM's population was already 52,828 some three years ago, in the Census of 2016; thereby in meeting the EU DG REGIO criteria for city population, i.e. minimum 50,000 population with contiguous, linking and uninterrupted intermediate densities of 500+ per square kilometre.**

Alongside the NPF document, it is therefore critical that the final RSES Plan should correctly show Drogheda, together with its LBM suburb, as EMRAs designated Regional City [and this similarly applies to all of the Eastern and Midland's NUTS2 territory].

Specifically, the selection of Athlone is problematic, particularly as it is located in the flood plain of Ireland's largest volume and longest river and consequently much of its surface area is subject to flood risk and may be uninsurable, property-wise. Furthermore, it is located in the periphery of the RSES Region, removed from both its Metropolitan and Hinterland areas and is remote to the high density east coast Dublin-Belfast Corridor.

The NSS (2002) selection of the Athlone-Tullamore-Mullingar (ATM) tri-Gateway was never viable both on aggregate population and specifically, on distance-decay grounds. Indeed, the faster-growing and larger populated settlement of Portlaoise, linking the State's three largest cities, at least, should have been considered in a Midland Region (NUTS3) hierarchical context, over the ATM Gateway format.

Likewise, the concept of a Drogheda-Dundalk-Newry 'linear city' has no validity on urban economic distance-decay grounds.

4: Specific Observations and Responses to the RSES Draft:

The growth Strategy for Drogheda is listed as "the promotion as a regional growth centre supported by a number of key towns and to focus on improving local economies and quality of life to attract investment"

It is important that the compact growth to date of Drogheda is recognised and taken into account. Drogheda's compact growth has delivered densities which are twice that of Athlone or Dundalk.

Page 6, the RSES provides a... Should include Local governance operation strategy. The planning and economic strategies will not be achievable if the current ad-hoc local governance is intended to deliver them, especially in situations like Drogheda crossing county boundaries

Ireland's population density, compared with the remainder of Europe, is exceptionally low which would allow in the region of 60% increase just to draw level, we need to exploit this for economic benefit and to allow Ireland as an island nation compete

rather than allowing similar limitations be imposed to the limitations on the heavier density nations.

Sustainable development goals (Fig.2.2) should include “an appropriate mix and supply of suitable accommodation”

A transition to low carbon society is better served by maximising the use of existing infrastructure and assets, to this end reviewing the underused return trips for trains and road travel will highlight the benefits of increased employment generation in areas where population increase based consumer desire is evident, Drogheda and its hinterland, as Irelands fastest growth are outside Dublin is one such example

On page 3 item 2 “Building within existing built up urban footprint” it is imperative that the existing density of the urban area is considered when setting targets to prevent unintended limitations on centres which have already achieved compact growth, for example the urban area of Drogheda is currently twice as densely populated as Athlone and 3.5 times that of Dundalk, if the limits set are a percentage increase on existing density that cripples existing performing centres in favour of sprawled areas due to the increased development costs, to encourage compact growth it would be preferable to set a target density (persons/km²) prior to allowing further spread of the urban area. There is a danger of the 30% criterion being incorrectly applied which will undermine the cited focus of Drogheda as a regional growth centre.

Compaction of urban centres will not function as desired unless it is aligned with similar criterion for open and green spaces to ensure all urban centres are living, breathing settlements.

The statement “To realise ambitious compact development targets at least 50% of all new homes within or contiguous to existing built up areas in Dublin and at least 30% in other metropolitan settlements” requires clarification (are we considering 50% and 30% of total regional development or 50% and 30% of the increase in the metropolitan areas? If the latter is the case then the unintended limitations applied by this formula should be removed and in lieu a target density (persons/km²) should be applied. This criterion is mixed across the document with some sections requiring the 30% to be within built up areas and other section allowing it to be within or contiguous to built up areas.

Item 3.1 Development of an asset based approach, this should be expanded to include maximising the use of existing assets such as targeting two way use for rail and road.

The current demographics indicates a high requirement for third level education in 2025-2030, if this is allowed occur with existing facilities it will increase the already critical transport and housing demand for Dublin, consideration should be giving to re-location of specific functions to educational campus closer to the centres where

this requirement is greatest and to promote the use of communication technology to reduce travel requirements.

Page 31 defines the requirement for cross boundary collaboration and the requirement for Joint Urban area plans for towns like Drogheda. Drogheda's ability to flourish has been seriously hampered by the lack of such a plan and therefore there should be some time limit placed on this requirement. It is also important to recognise that Drogheda competes with Dundalk for economic investment and with Navan for tourism positioning within the Boyne valley, it would be therefore inappropriate if the joint urban plan was developed without a strong Drogheda-centric involvement (such as Drogheda Chamber of Commerce) in the process.

The NPF roadmap projects a population increase of 15K for Louth and 26K for Meath in the period 2016-2026, for the allocation of development land and to prevent a hindrance of Drogheda's ability to grow in accordance with the proposed RSES strategy it is imperative that the allocation is based on previous growth rates and consumer desire.

Page 48 discusses Drogheda as a regional growth centre and requires a Joint Urban plan to be prepared. The 30% compacted growth will be difficult to achieve due to the level of compact development which has occurred, some lenience on this will be required.

The Joint Urban Plan to be developed should be directed to take account of Drogheda arriving at a population of 50K within the next 7-10 years. It should also recognise the fact that Drogheda is immediately adjacent to the settlement of Laytown-Bettystown-Mornington with a population in excess of 12K and growing rapidly, if the European guidance on urban settlements was adopted this settlement and Drogheda would be considered one entity with a combined settlement population in excess of 55K. The RSES should take this into consideration.

RPO 4.8 should include the business community through Drogheda Chamber of Commerce, with an option to refer to national government for mediation, in the development of the plan to ensure the bias/conflicts noted above from Navan & Dundalk do not skew the plan.

RPO 4.8 should recognise the existing compact nature of Drogheda and the difficulty achieving 30% growth within the built up area in comparison to other centres.

RPO 4.8 mentions development of lands at McBride station as employment generation, this should specifically include the Marsh Road brownfield lands including between the R150 and the river Boyne as phase 1 and between The R150 and the railway as Phase 2.

RPO 4.9 The development of the Port Access Northern Cross route is the essential next step in the Development of Drogheda. Without this development proper sustainable planned development of Drogheda will not happen. The land has been

acquired and the permissions are in place therefore the mention of the Norther Cross Route should be altered from “supporting the future Development of...” to “Supporting the prioritisation of the development of the Port access Northern Cross Route”

RPO 4.11 should be changed so as to promotion of economic and employment development to match and catch up not only on past residential development but also the anticipated development into the future. Irrespective of the criterion laid down in the strategies consumer desire has driven rapid residential growth in the past and will continue to do so into the future, it would be incorrect for the plan not to recognise and plan for this.

RPO 4.12 should be expanded to include the development of an accessible town centre floating marina in including a tide locked harbour to increase the use of the river as a recreational space.

An additional RPO, matching RPO 17 listed for Dundalk, should be added “Enhance Drogheda’s role as a strategic employment centre on the Dublin-Belfast Economic Corridor and provide for employment opportunities through the identification of suitable sites for new industry including FDI.

RPO 4.31 should be moved from Navan to Drogheda, The Lourdes Hospital in Drogheda has developed into the de-facto Regional Hospital for the North East (and the infrastructure has grown with it) with other Hospitals in the area providing a supporting role. To move the regional hospital to Navan would be to ignore the value of existing assets and would fly in the face of the purpose of the plan.

Section 4.7 has missed one of the fastest growing settlements being Laytown-Bettystown-Mornington (LBM) which is cited in the CSO figures as growing at a rate in excess of 32% over the past 10 years to a 2016 population of 11,872. Based on current construction activity since 2016 we would suggest that this figure has increased to closer to 15K. If this suburb is not to be considered as part of the Drogheda agglomeration (In contravention of European guidance) then it must be consider on its own as an important support town to Drogheda and Dublin with a requirement for an investment in services, employment growth and Infrastructure in a similar manner to Ashbourne, Balbriggan, etc.

5. The Population Carrying Capacities for Regional Cities in the Three Administrative Regions:

The EMRA Administrative Region has 'carrying capacity' for one additional Regional City (RC), in addition to Dublin (the only Metropolitan one), over and above the four existing RCs.

The Northern and Western Administrative Region has one - Galway City for its **847,442** population.

The Southern Region has three regional cities for its 1,585,906 (averaging one per **528,635** of population).

When all of Dublin is excluded from the EMRA total, there is an adequate 'carrying capacity' for one other Regional City for the residual **981,158** population (i.e. 2,328,517, less all of Dublin's 1,347,359).

This eight-county sub-region includes the four Midland counties plus the four Mid-East ones (i.e. including Louth).

Drogheda+LBM is the only 50,000-plus populated settlement: Dundalk at 39,004 being the second largest settlement in this eight-county residual area, as at the 2016 census.

The CSO has kindly provided their following modified 2016 gridded populations, wherein the qualifying one square kilometre density population for contiguous Drogheda+LBM is set out, first showing the 2016 densities, followed by the 2011-2016 growth figures for the corresponding, same grid layout, thus:

6: Drogheda-LBM 2016 Census Gridded Population and OSI Grid References:

Grid cells	<u>6/7</u>	<u>7/8</u>	<u>8/9</u>	<u>9/10</u>	<u>10/11</u>	<u>11/12</u>	<u>12/13</u>	<u>13/14</u>	<u>14/15</u>	<u>15/16</u>	<u>16/17</u>	Totals
79/80	119	52	84	9	27	99	58	84	34	51	0	617
78/79	26	6	24	60	62	87	54	91	5	0	0	415
77/78	19	16	67	18	475	170	79	59	130			1,033
76/77	77	226	3,212	3,380	2,563	7	5	95	523	285	-	10,373
75/76	1,325	1,820	3,115	3,733	841	15	30	111	288	1,090	-	12,368
74/75	1,053	3,656	3,188	2,878	2,453	2,608	812	822	863	742	-	19,075
73/74	66	648	606	693	525	1,176	64	13	1,419	2,435	226	7,871

72/73	38	32	75	55	44	13	102	20	94	792	393	1,658
71/72	5	24	85	0	80	5	18	19	40	489	1,438	2,203
70/71	46	28	5	54	76	49	45	307	233	27	11	881
Total	2,774	6,508	10,461	10,880	7,146	4,229	1,267	1,621	3,629	5,911	2,068	56,494

Based on co-ordinates of the OSI Discovery Series, Map 43 (Fourth Edition, 1: 50,000 Scale)

Next is shown the similar individual one kilometer cell, population growth data, 2011-2016, for the corresponding cells for Drogheda-LBM, thus: Total net growth = 3,529 or 6.66% (State = 3.78%).

Grid cells	<u>6/7</u>	<u>7/8</u>	<u>8/9</u>	<u>9/10</u>	<u>10/11</u>	<u>11/12</u>	<u>12/13</u>	<u>13/14</u>	<u>14/15</u>	<u>15/16</u>	<u>16/17</u>	Totals
79/80	-12	-2	-2	0	-1	-8	0	-13	-6	14	0	-30
78/79	0	0	-3	1	4	3	2	8	0	0	0	15
77/78	-1	-1	6	2	26	17	0	-6	31	0	0	74
76/77	3	7	569	72	140	-3	0	15	34	-21	0	816
75/76	113	286	-111	180	18	10	-16	-1	13	31	0	523
74/75	25	25	5	151	42	138	139	70	115	51	0	761
73/74	-7	95	112	-12	90	315	8	0	195	273	41	1,110
72/73	-4	12	-5	-7	-1	0	-4	9	4	87	1	92
71/72	0	-1	-2	0	-5	0	3	-1	5	46	60	105
70/71	-5	3	0	-7	0	6	-7	54	10	6	3	63
Total	112	424	569	380	313	478	125	135	401	487	105	3,529

Source: Brian Hughes analysis of CSO, amended 2016 grid-population-growth.

7: Evidence of Current Expansions and Development of Drogheda+LBM

Thousands of new houses are currently under construction or are in the pipeline for the Greater Drogheda Area together with an assumed, potential average occupancy of three persons per occupied dwelling, as follows:

The overall number of new buildings for the Northern Environs Plan area for Drogheda is 7,000 units with an expected population of 21,000 new residents. Roughly 50% of these are under construction or are about to start.

Other areas for residential development are the Old Slane Road area and Drogheda Town Centre, with about 1,500 units, giving a further increase in population of 4,500 people. These have not commenced at this time.

These combined developments would add approximately 25,500 people to Drogheda in County Louth.

In the developments on the immediate southern environs of Drogheda that are contained in the County Meath Development Plan. There is approximately 2,500 residential units still to be constructed in Drogheda County Meath; this would add a further 7,500 people to the above figures.

Therefore, there will be approximately 33,000 new residents in the immediate Drogheda area if the potential of the County Meath and County Louth Development Plans are reached. This would not include the figures for development centres such as Laytown, Bettystown, Morningtown or Termonfeckin, where zoned development land still exists under the present area plans.

Within the last few years and particularly since the 2016 census, over 1,500 new houses have been completed (most of which are occupied) and many more hundreds are now under construction in Donnacorney, Bettystown Cross and adjacent areas. Together with the major waste-water treatment plant on the Marsh Road and the Development of the District-level Shopping Centre at Southgate, the fusion and urban agglomeration of Drogheda with LBM is being consolidated and the respective grid populations thereby further enhanced.

Together with other complementary construction, including the provision of a new crèches, schools and other central place developments, the evidence base of housing points to a rate of housing completions that is 2.25 times that of the Waterford area, as per the CSO's new Quarterly Completions Returns, since the start of 2017 inclusive of third Quarter 2018.

With the strong demand for and completion of so many thousands of new dwellings and with the superior differential population growth, reinforced with the square kilometre cells population growth data for 2011-2016, this provides compelling evidence that the demography of Drogheda, inclusive of its south-eastern suburbs of Laytown-Bettystown-

Mornington, has now exceeded the population of Waterford to have become the State's fifth largest city.

8: Action/ Implementation:

Drogheda and LBM experience a huge daily exodus of commuters, workers some of whom could find local employment if more central place activity were positioned therein – reflecting the loss to local business, local governance and compromising the vibrancy of its city centre. The establishment of appropriately-scaled third level education facilities would also contribute to enhancing local employment and would act as primary drivers for identifying locations for strategic employment generation. Unlike Dundalk, Drogheda is not designated as a Strategic Employment Centre. The IDA, Enterprise Ireland and Local Government presence is either non-existent or is patently inadequate to reflect Drogheda's population scale.

The response to the above-referred recent PQ to Senator Ger Nash was based principally on the potential costs, to Louth and Meath County , that would have to be incurred if Drogheda were to be administered as one-city settlement. This conveys a very negative and hopeless message to the people of the area; to the effect that the agglomeration benefits and economic welfare of Ireland's new emerging city are to be sacrificed so as to maintain the status quo of an unchanging Local Government rigidity. That pathetic answer is posited as if the Putting People First reform of Local Government had yet to be penned and that the county boundary fixity of the Local Government Act of 1898 and subsequent related legislation is intended to be maintained at the expense of settlement growth and straddling.

As the Regional Economic and Spatial Strategy will be used to develop the county development plans, there will be political influence in the creation of these plans, it is imperative that the content and language of the RSES cannot be used for political gain above the intent of "benefit for all peoples from all areas". In advance of publication all aspects of the plan should be stress tested in this respect by independent persons not involved in the development of the plan.

Instead, and pending the Government's decision on the DCSC's Petition for City Status, the RSES Final Report should take account of this Study's submission and therein, provisionally recognise Drogheda (including its LBM suburb) as being a city, within that Report, based on the evidence adduced herein as already having been presented to Government.

Signed: Brian P Hughes

Dated: 23rd January, 2019

NPF Settlements - Housing Completions for three years, 2016-2018 (excl. Dublin)

City / Town	Year 2016	Year 2017	Year 2018	Aggregate
Limerick	288	460	490	1,238
Drogheda	208	384	613	1,205
Galway	352	409	431	1,192
Cork (S+N)	258	460	490	1,138
Dundalk	159	231	296	686
Waterford	131	190	270	591
Letterkenny	133	141	200	474
Sligo	63	98	168	329
Athlone	36	48	82	166

Source: CSO Housing Completion data, Release dated 07.02.2019

