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To: RSES
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Subject: Submission by Drogheda & District Chamber of Commerce to RSES
Attachments: Drogheda Chamber Regional Spatial Strategy Submission 1.docx

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Please find enclosed submission by Drogheda Chamber of Commerce to the Regional Spatial & Economic Strategy for your consideration.

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Council Member, Drogheda & District Chamber of Commerce

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Drogheda & District Chamber of Commerce – Submission to the Draft Regional Spatial & Economic Strategy for the Eastern and Midland Region – January 23rd 2019

Drogheda & District Chamber of Commerce wish to make the following observations to the Draft Regional & Economic Strategy and trust that these observations will be considered on their merit and included in the formation of the Final Plan.

- As the Regional economic and spatial strategy will be used to develop county development plans, there is the potential for political influence in the creation of these plans. It is therefore 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 or of the respective county development plans.
- 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 welcome that Drogheda’s position as a regional centre is now recognised and imperative that its position is not watered down in the final plan. To this end, Drogheda should additionally be designated as a “Strategic Employment Centre” to more accurately capture it’s size, importance, population, catchment and existing underutilized capacity to host additional industrial investment in terms of employment policy for the region as a whole.
- 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. This gives the Drogheda area the potential to deliver further high density development which avoids urban sprawl and which maximises the use of existing transport infrastructure along the M1 Corridor and Dublin-Belfast railway line.
- Local governance operational 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. In February 2017, the Drogheda Boundary Review Committee published it’s final recommendation which recommended that the existing split in administration of Drogheda between Louth and Meath County Councils be maintained while acknowledging the many strong arguments in favour of a boundary extension. The Commission also recommended joint tasks to be undertaken under the headings of *“A unified vision for Drogheda; A Joint Local Area Plan for the Greater Drogheda Area incorporating this vision in a comprehensive strategy for the sustainable development of Drogheda, including social, cultural, environmental and economic development. This may necessitate variations to the existing County Development Plans as a Local Area Plan may not contravene its parent Development Plan; A joint retail strategy for the town for*

Drogheda; A joint initiative to improve community cohesion and further develop an identity of belonging to Drogheda for all citizens while retaining current county allegiances as part of the above process; A report detailing the results of a comprehensive review of service delivery of all local authority services and functions analysed as a totality (as per the recommendation of paragraph 6.4.2(c) of the Action Programme for Effective Local Government, Putting People First) and as individual services with a view to creating efficiency, effectiveness and coherence of delivery to the communities and citizens of Drogheda who ultimately should be able to access almost all services locally. Specific provision is to be made in respect of the housing estates split between the two local authorities to ensure a unity of service at local level. This will lead to the preparation of a Service Delivery Plan; An analysis of services delivered by other bodies, e.g. IDA, Enterprise Ireland, HSE, including recommendations to Government for delivery on a whole of town basis where deemed appropriate”.

While the Committee did not recommend a change in the local authority boundary it is clear that they did deem the extended urban area of Drogheda across both Louth and Meath as one single urban entity. The RESS should 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 i.e. an existing city. (A **City** is a local administrative unit (LAU) where the majority of the population lives in an urban centre of at least 50 000 inhabitants. The **Functional Urban Area** consists of a city and its commuting zone. (This was formerly known as larger urban zone (LUZ), See: <https://ec.europa.eu/eurostat/web/cities/spatial-units>).

In addition, the Constituency Commission in its 2007 report which incorporated Laytown-Bettystown-Mornington into the same Dail Electoral Constituency as Drogheda stated that “Louth should become a 5-seat constituency by extending the constituency southwards from, and in the environs of, Drogheda and taking in electoral divisions (population: 17,333) which have extensive linkages with the town. This will allow the inclusion of the town of Drogheda and hinterland areas in a single constituency”.

It is also worth noting that Bus Eireann’s most frequent commuter service from adjoining areas is the “D1” route serving Mornington-Bettystown-Laytown, “D” being for Drogheda demonstrating the fact, in practical terms, that these areas form part of the Drogheda area.

The RSES should take these points into consideration and designate Drogheda as both a City and a Strategic Employment Centre accordingly.

It is also worth noting that the Drogheda Boundary Committee concluded that “Meath and Louth County Councils should provide to the Minister a Joint Implementation Plan within 6 months of the publication of this report to indicate their proposals and timelines for completion of these tasks, and thereafter provide joint annual reports to him or her on progress in their implementation. In the event of substantial non-completion of the above four tasks within a four-year period, it is the

*view of this Committee that the Minister should consider the necessary steps, **including revisiting the option of extending the boundary**, in order to achieve coherent sustainable for Drogheda”*

- Irelands 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 area 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 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 (see above) 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 hinderance 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, there is a statement that Drogheda will achieve a population target of 50K by 2031 however based on current trends and the proposed development of the northern cross it is anticipated that it will achieve this level significantly in advance of 2031 and it would be negligent of the RSES not to plan for this. 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 (see page 1 & 2 above). Again, 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 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 on page 56 should be moved from Navan to Drogheda, Our Lady of 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. There is no current plan by the HSE to move the current regional hospital from Drogheda to Navan.
- 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 13K. If this settlement 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.
- Page 91 cites location of technology and university campus as primary drivers for identifying locations for strategic employment generation. Drogheda due to its location infrastructure and transport services has excellent access to universities and IOTs and to DIFE. The fact that there is not a University or IOT in the town/city should not preclude Drogheda as a locations for strategic employment generation as there are several IOTs (DKIT, TUD, NCI) and Universities (TCD, UCD, DCU, Maynooth) all within daily commuting distance of Drogheda by bus and train, making it among the best connected urban area to third level institutions in the country.

- Natural and cultural tourism assets, an additional RPO should be included to address the shortfall of tourism accommodation in the region by supporting the development of all types (Hotel, B&B, Self catering, Tourist Hostel and touring campsite).
- Leverage the existing technology based enterprise in the Mill for the development of the smart city program.
- RPO 6.31 the Economic Risk Management system should rely on past performance and future consumer desire in assessing the risk/benefit of investment in infrastructure and programs.
- On page 124 Under Greenways, Blueways and Peatways the Boyne Greenway (Boyneside Trail as now expanded to Newbridge to Newgrange) should be included. On page 126, in the Table Greenway opportunities, the following should be included “The Boyne Greenway (Boyneside Trail) which is partially complete with the remainder at an advanced stage of planning has recently been expanded to become the Newbridge to Newgrange greenway as a collaboration between Fingal, Meath and Louth. This walking and cycling route will pass through, in a sustainable manner, a world class landscape of outstanding heritage biodiversity and culture, it will serve the largest population centre in the country and provide significant economic, tourism and health benefits and critical infrastructure linkages to transportation hubs”
- Table 8.3 should include an additional bullet point being – re-configuration of the urban bus service in Drogheda from 2 linked circular routes to a singular figure of 8 route to double the capacity of the route and the bus stop infrastructure without a requirement for additional resources.
- Table 8.4, the Laytown to Bettystown link road should be extended to Colpe Bridge and include pedestrian and cycling facilities to facilitate better infrastructure linkage between the settlements of LBM and Drogheda.
- RPO 8.12 – the support for park and ride developments is welcome however the facilities should provide a cost effective, secure and pleasant environment for the users. The cost of operation and maintenance of these facilities should be borne out of central funds in recognition of the overall benefit to urban centres rather than imposing this cost on users.
- Under placemaking an additional RPO should be included to direct local authorities to include local voluntary activist groups in the development, delivery and maintenance of civic spaces.
- RPO 9.9 should be changed from a % increase on existing built areas to a target density (persons/km²) The current proposed % targets penalises urban centres which have already achieved significant compact growth in favour of more sprawled centres. It is significantly more difficult and expensive to increase 30% in Drogheda (increase from 2700 persons/km² to 3500 persons/km²) than in Athlone or Dundalk (Increase 1600 persons/km² to 2080 persons/km²).

While the concept of compact growth is good the adoption of a blunt % increase will have the undesired effect of driving investment away from centres which are already achieving compact development design.

- RPO 9.19 should be extended to include the requirement for a minimum percentage of green open space in urban centres with appropriate planting to allow human activity and biodiversity to ensure urban centres are living breathing spaces.
- RPO 10.1 should be expanded to ensure that finance spent on the upgrade of water infrastructure is based on confirmed population trends and not policy targets until there is evidence that the targets are achievable, priority for water infrastructure spending should be allocated to existing known requirements.

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