

# National Planning Framework 2040

Louth County Council Submission

10<sup>th</sup> November 2017





#### Introduction

The primacy of the Dublin / Belfast corridor in the urban network on the island and the unique opportunity afforded by two of the largest towns in the State of Drogheda and Dundalk, as sustainable national growth centres along the Corridor, is the basis of the Louth County Council submission of the 31<sup>st</sup> March, 2017. The explicit inclusion in the Draft Ireland 2040: Our Plan of the pivotal economic role of the Dublin / Belfast Corridor, the acknowledged largest economic agglomeration on the island of Ireland, and the objective to enhance the international visibility of the Corridor is of exceptional note. Objective 46 states:

In co-operation with relevant Departments in Northern Ireland, to further support and promote the sustainable economic potential of the Dublin-Belfast Corridor and enhance its international visibility.

It is considered that Drogheda and Newry / Dundalk can fulfil their significant economic potential in their future enhanced promotion and visibility as sustainable urban settlements of scale comprising and defining the linear economic Dublin / Belfast Corridor linking the principal metropolitan areas on the island of Ireland. It is anticipated that the requirement for *effectively planning and developing existing large designated centres along the main economic corridor* will ensure, with Newry-Dundalk, a significant role for Drogheda within a linear urban network of sustainable growth centres extending north along the east coast from Drogheda to Newry and beyond. It is strongly argued that the realisation of the potential of greater economic synergy between the principal cities on the island of Dublin and Belfast while exploiting the latent potential of the largest towns in the State of Drogheda and Dundalk would be an effective counter action to BREXIT.

#### Principal Observation on the Draft Ireland 2040: Our Plan

The Draft Ireland 2040: Our Plan designation in Chapter 7 under *Cross Border Local initiatives (Co-ordinated Spatial Planning)* of the Newry / Dundalk area, as an economic growth centre to *develop the critical mass of the Newry-Dundalk area to complete with other larger cities* is welcome. It is considered that the designation is supported by the potential to develop a wide range of employment and service opportunities that can appeal nationally and internationally equidistant between the metropolitan areas of Dublin and Belfast. The latent economic potential of the Corridor is evident, with the cities and towns along the corridor home to a population of around 2 million people. The development of the Corridor in co-operation with relevant Departments in Northern Ireland is supported by Louth County Council. Furthermore, Louth County Council will continue to pro-actively engage with other landuse managers along the Corridor including cross border collaboration in order to realise the objective of creating a distinct spatial area with international visibility.

Co-operation between regions for territorial development is widely accepted as good practice within the European Union (EU) and is promoted in the European Spatial Development Perspective (ESDP), and the EU Territorial Agenda (EUTA). Louth County Council has a long-standing mutually beneficial working relationship with Newry, Mourne and Down District Council, which is formalized in a Memorandum of Understanding (MOU) between the Councils. Furthermore, the East Border Region Ltd



has been the conduit for cross border co-operation within this region for over thirty years and played a pivotal role in encouraging and supporting the establishment of the Memorandum of Understanding (MOU).

In this regard the governance initiatives cited in Chapter 9, Section 9.2 are welcome including but not exclusively the following which states in the matter of North-South co-operation:

Despite the challenges posed by Brexit, recognising the strong economic, cultural and practical ties between Ireland and its neighbours, both in a north-south and east-west context, subject to the agreement of Governments and institutions, Co-operation and interaction through political and administrative structures such as the North-South Ministerial Council and the British-Irish Council will be broadened to include specific national planning and infrastructure coordination stream of activity.

And Objective 45 which states:

Work with the relevant Departments in Northern Ireland for mutual advantage in areas such as spatial planning, ecomonic development and promotion, co-ordination of social and physical infrastructure provision and environmental protection and management.

## Integrating Spatial and Transport Planning

A preliminary feasibility study to further the goal of a high speed rail link between Dublin and Belfast has been initiated by a collaboration of land use managers along the Dublin / Belfast Corridor with the private sector. The high speed line would enhance connectivity between the two principal cities on the island with a target 1 hour journey time and potentially enhance the accessibility of the towns of significant scale along the Corridor. In this regard the public transport actions cited in Chapter 9, Section 9.3 are welcome including the following action which states:

To strengthen public transport connectivity between cities and large growth towns in Ireland and Northern Ireland with improved services and reliable journey times.

It is considered that the development of a high speed rail link between Dublin and Belfast would satisfy the above while offering passengers a step change in terms of capacity, speed and service quality that will help unlock the potential of the Corridor and the destination cities of Dublin and Belfast.

### Draft Ireland 2040: Our Plan response to the Louth County Council submission of the 31st March, 2017

The Louth Council submission of the 31<sup>st</sup> March, 2017 concluded with five bullet points in response to the Issues and Choices Papers. It is proposed to make observation on the Draft Ireland 2040: Our Plan with reference to the concluding bullet points of the previous submission:



### Bullet Point 1 of the previous submission stated:

 The NPF must acknowledge the pivotal geographic location of County Louth within the primary economic corridor on the island of Ireland – the Dublin / Belfast Corridor, and the significant potential of the strategic locations of Drogheda and Dundalk to attract sustainable employment and settlement.

The Draft Ireland 2040: Our Plan Section 7.3 clearly states the significance of the Dublin / Belfast Corridor as the primary economic corridor on the island of Ireland. Furthermore, Figure 7.2 is explicit in defining the status of Dundalk jointly with Newry as a designated urban location *to develop critical mass to compete with other larger cities*. It is argued that the potential of Drogheda, the largest town in Ireland, as a sustainable growth centre within the developing *distinct spatial area* of the Dublin / Belfast Corridor should be acknowledged. Drogheda is one of the *existing large designated centres along the main economic corridor*. In the context of Section 7.3, it is requested that Drogheda is explicitly stated in the final document Ireland 2040: Our Plan, as an identified location in the economic development of the Corridor. It is further requested that a diagram showing the Dublin / Belfast Corridor spatially is included in the final document. It is proposed that the diagram would show the economic corridor aligned with the linear rail and road network and would include the location of County Louth with reference to the large towns of Drogheda and Newry / Dundalk.

## Bullet Point 2 of the previous submission stated:

• The NPF has the opportunity to realise the potential of Drogheda and Dundalk as complementary consolidated urban growth centres forming a linear gateway between the Dublin metropolitan region and the north east of the island as a counter action to BREXIT.

In response the Draft Ireland 2040: Our Plan under *Cross Border Local initiatives (Co-ordinated Spatial Planning)* designates Newry / Dundalk as the spatial location on the economic corridor to *develop critical mass to compete with other larger cities*. It is considered that the designation of Newry / Dundalk can potentially realise the objective of a gateway between the Dublin metropolitan region and the north east of the island as a counter action to BREXIT, as part of a linear network of urban centres strategically located along the corridor including Drogheda.

# Bullet Point 3 of the previous submission stated:

 Drogheda and Dundalk are logical sustainable employment growth centres because of their location proximate to Dublin City and airport and their accessibility by rail and motorway. Drogheda and Dundalk as locations for business start ups and business relocations from Dublin and its suburbs, including international service and technology companies, is an established dynamic. Investment in public transport and support facilities and services is required to copper-fasten this sustainable dynamic.



In response, Chapter 3 (3.6) of the Draft Ireland 2040: Our Plan identifies 41 large towns at sub-city level with a population in excess of 10,000. It is strongly argued that building accessible centres of scale while making stronger urban places will require a targeted approach at national level in order to effectively define the optimum urban centres for sustainable growth and agglomeration. It is recommended that the sub-city level towns be allocated into 3 sub categories defined by their population size comprising 10,000 +, 20,000+ and 30,000+, respectively, in order to acknowledge the proportionality of scale of larger Irish towns and to recognise where agglomeration is an established dynamic.

Furthermore, Chapter 3 states:

As well as scale and density, this is dependent [agglomeration of firms] on the attractiveness of places to highly skilled potential employees as well as having a steady stream of local talent and innovation associated with third level research institutions. International connectivity is also important, where short travel times to an airport with a good choice of destinations is a crucial factor.

Drogheda and Dundalk are the urban centres of significant scale in the Irish urban hierarchy by population size outside the historic Dublin county boundary with the exception of the designated provincial cities. Drogheda has a population of 42,347 (2016) and Dundalk and Environs Plan Area has a population of 39,004 (2016). They are the largest towns in the State. In tandem they are uniquely located between the Dublin and Belfast metropolitan areas with access to the deep labour markets in both city regions. It is strongly argued that the realisation of the concept of reciprocal commuter flows is best realised in the locations of Drogheda and Newry / Dundalk. It is considered that the designation of Newry / Dundalk in the Draft Plan acknowledges the latent potential of creating centres of scale along the Dublin / Belfast corridor that will attract reciprocal flows of highly skilled employees from both the Dublin and Belfast labour markets. Thus existing transport infrastructure will be optimised fully utilising the capacity of the north –south road and rail network in both directions and the potential for new transport investment optimised.

In the matter of developing and retaining local talent and fostering innovation the towns of Drogheda and Dundalk / Newry achieve the objective through DKIT in Dundalk and in the instance of Drogheda through its proximity to third level institutions in Dublin. The retention of indigenous talent can be achieved by providing appropriate and career advancing employment opportunities locally. The proximity of Drogheda and Dundalk / Newry to the deep labour markets of Dublin and Belfast, the availability of local talent, the potential for business to grow in locations proximate to Dublin City Centre but without the growth constraints evident in the City core and the availability of international connectivity through Dublin airport, an international hub airport, ensures that Drogheda and Newry / Dundalk are target investment locations. It is strongly argued that the potential for agglomeration is greatest in Drogheda and Newry / Dundalk by reason of proximity to deep labour markets, national accessibility to centres of population, international connectivity and availability of third level education. It is requested in the final document to show in a clearly defined urban hierarchy the centres of scale that have the potential to achieve agglomeration with



reference to Chapter 3 of the Draft Plan to include the performance indicators of agglomeration cited on Pg. 42 (Economy / Prosperity).

## Bullet Point 4 of the previous submission stated:

In 2040 the urban centres of Louth have the potential to be sustainable centres for employment and settlement, as part
of a network of growth centres within a poly-centric metropolitan Dublin City region, with a high level of reciprocal
commuter flows between Dublin and its suburbs and Drogheda and Dundalk rather than dormitory towns for Dublin.
However, a spatial plan for Dublin and its metropolitan region combined with investment in infrastructure in specific
public transport infrastructure is required for this potential to be realised.

In response, Chapter 9, Objective 63, of the Draft Plan proposes the preparation of Metropolitan Area Strategic Plans (MASPs) for the identified cities and their metropolitan regions including Dublin. Louth County Council welcomes the proposal to prepare a 12 year strategic plan for Dublin and its metropolitan hinterland. It is considered that the interconnected nature of the city region requires metropolitan scale land use and transportation planning. In the context of strategic land use and transportation planning, it is requested that the spatial relationship between the CSO defined Dublin Metropolitan Area and the distinct spatial area of the Dublin / Belfast Corridor is shown diagrammatically.

## Bullet Point 5 of the previous submission stated:

 The comparative advantages of Louth in terms of its geographic location, accessibility, universal fibre broad band availability, education and experienced workforce, youth demographic and overall quality of live will ensure in a market economy that growth will locate in the County. The NPF needs to facilitate and plan for that growth in the sustainable locations of Drogheda and Dundalk by recognising these complementary large towns as national, regional and local growth centres.

In response, Chapter 9, Objective 64, of the Draft Plan proposes the preparation of urban area plans for towns and their environs with a population of more than 15,000 people. Louth County Council welcomes the preparation of urban plans for Drogheda and Dundalk. The Dundalk and Drogheda urban plans have the potential to provide for the sustainable and strategic develop of these large urban centres and their suburban hinterlands. However, it is acknowledged that the efficacy of the urban plans for Drogheda and Dundalk and their requirement to satisfy *inter alia* a suite of objectives including Objective 3c, 4, 5, 6, 7, 9b, 10 is dependent on the preparation of a regional spatial and economic strategy which will prioritise the potential of these urban centres given their unique scale and geography.

The requirement of Objective 3c to develop at least 30% of all new homes within the built-up envelop of existing urban settlements is acknowledged as a significant challenge given the cost and complexity of brownfield / infill development proposals in comparison to virgin development on green fields. It is noted that Drogheda and Dundalk have significant brownfield / infill development opportunities. Louth County Council while acknowledging the objective to deliver at least 30% of

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all houses within the envelope of existing settlements is challenging will principally through urban regeneration satisfy this objective.

In this regard and in the context of Objective 5, which seeks *cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth and investment* Louth County Council has prepared a draft urban design vision for the regeneration of the Westgate area of the historic town centre of Drogheda. The Westgate Vision as an alternative to virgin development on green fields promotes and supports the adaption and reuse of vacant buildings and floor area, the sensitive redevelopment of vacant lands for new homes and businesses and public realm interventions possible to create an attractive, liveable and well designed urban district.

### Conclusion

The stated objective of Louth County Council in its submission of the 31<sup>st</sup> March, 2017 is the development of the linear urban network of large towns, principally Drogheda, Dundalk and Newry, between the Dublin and Belfast metropolitan areas as a logical and sustainable national growth strategy. The subsequent designation in the Draft Ireland 2040: Our Plan of the Dublin / Belfast corridor as the primary economic agglomeration on the island and the objective to make the Corridor transparent internationally is welcome.

Ireland 2040: Our Plan is the opportunity to forward plan for the sustainable development of the Dublin / Belfast Corridor as an internationally identifiable location for investment. The development of urban centres of significant scale, individually in the instance of Newry / Dundalk and collectively in the instance of Drogheda, in a linear network of complementary centres is required to achieve this objective. It is strongly argued that it is evidence-based that agglomeration is happening and is potentially greatest along the Corridor. However, to develop urban centres of significant scale with international exposure will require prioritisation in the EMRA regional spatial and economic strategy and explicit designation of Drogheda in Ireland 2040: Our Plan. It is strongly argued that the prioritisation of the Dublin –Belfast Economic Corridor is the most effective use of public and private investment to achieve agglomeration in sustainable growth centres, principally Drogheda and Newry-Dundalk, and is the principal counter action to BREXIT.