

Our Ref: 212067/EPP/111001  
Your ref:

Department of Housing Planning  
Community and local Government  
Custom House  
Dublin  
D01 W6X0

10 November 2017

Dear sirs

**Re: Submission to draft Ireland 2040 our plan – National Planning Framework**

By way of introduction my name is Eddie Phelan and I am a Civil and Structural Engineer, running a consultancy practice in Drogheda providing planning, architectural and Engineering services to the community for the past 25 years. In addition to running the business I am married and a father of three children aged 20 – 25, and have immersed myself in both the engineering profession and the local community.

This immersion has involved my being a current member of the board of management of a 1200 student primary school, being past president of Drogheda and District Chamber of Commerce, being past chair of the parents council of a 1000 student secondary school, being past chair of Drogheda Tidy towns (10 Gold medals in succession), being a member of the Fleadh Executive Committee for Fleadh Cheoil Na hEireann 2018 who have brought the festival to the east coast, being a director of the Boyneside Trail Development Company, being a director of the EM (East Meath) Community Development Company, being a council member of Engineers Ireland Structures and Construction Division, being a council member of The Institute of Structural Engineers Irish Branch, being a member of the National Standards Authority of Ireland Eurocode experts panel for the development of construction standards and the national representative for SC2 Concrete.... And yet I am nothing special in the locality and pale into insignificance in comparison to others within the local community and their level of commitment to developing the town and region of Drogheda to provide the type community the citizens deserve.

These local community volunteers and activists have been giving their all for the past 10 years fighting an uphill battle against the limitations imposed by Drogheda's incorrect placing in the national spatial strategy but the two elements which sustained their efforts were;

- the acceptance from the elected and permanent government that the National Spatial Strategy was flawed and would be replaced by a planning framework with the ability to correct the consideration of Drogheda
- the fact that the National Spatial Strategy did not work allowed Drogheda some breathing room



Unfortunately despite assurances to the contrary by successive ministers, the new draft framework has now been published and the persons responsible for its content have either ignored the evidence submitted, that irrespective of the constrictions applied by the proposed framework Drogheda and the region will remain the largest town in Ireland and will most likely achieve city status over the life of the plan or, have accepted the evidence but still bowed to political pressures to further constrict the development of Drogheda under some mis-apprehension that such constriction will assist the development of other areas with stronger political influences. In either scenario the approach taken flies in the face of the assurances given by minister Coveney and his team that the framework would be driven by the principles of putting people first and based on evidence without political influence.

The omission of any recognition of Drogheda in the draft National planning framework belies any strategic planning expertise of the developers of the plan or any consideration for the 100K people that its omission will directly, negatively impact on.

Drogheda and the region has grown faster than any other area outside Dublin, in submissions to the plan you will hear population figures ranging from 32K (from opponents of Drogheda) up to 100K from the proponents for city status, with the settlement figures quoted by the CSO based on the 2016 census as 40,956. The reason for this variation is that Drogheda is unique in Ireland in that it is not only the largest town in the country but it is surrounded within it's hinterland with a number of heavily populated settlements, this configuration is not replicated elsewhere else in the country and demands specific consideration.

The figure adopted of 32K for some policy decisions (to apply a restriction on Drogheda) only considers the citizens resident within the ancient town boundary which splits residential estates in the town and ostracises a large contingent of Drogheda residents who are imbedded in the fabric of the town, the census figure of 40,956 considers all people resident in the town of Drogheda in the contiguous housing estates to the north and south of the town centre, some of these people are administered from Navan and the remainder are administered from Dundalk since the administration was pulled out of Drogheda in the last plan. The figure of 63K people includes the settlements in the immediate hinterland and almost contiguous with Drogheda e.g Laytown Bettystown and Mornington, Baltray and Termonfkin but excludes many settlements (e.g Tullallen, donore etc.) which are split from the town by the M1 motorway. The figure cited of 83K takes in these additional settlements which engage intimately with Drogheda for the full provision of retail, healthcare, education, employment and leisure requirements of the citizens whereas the figure of 100K includes settlements such as Duleek, Cloherhead etc where their primary centre is Drogheda but they would also pull some services from Navan and Dundalk. All of these figures can be verified by consideration of the small area populations from the CSO

The most accurate figure population figure to use for Drogheda is either 63K for the immediate hinterland or 83K for the population who will be directly effected by Drogheda's development or demise. If the CSO quoted figure of 40,956 is to be used in any considerations of Drogheda it is only valid to use this figure with the acknowledgement of the additional 42K people also directly affected by the specific policy.

If the community engagement process is to have any meaning and the putting people first policy can override political agendas it is incumbent on the developers of the plan, on behalf of the 100,000 citizens within Drogheda and it's hinterland which will be affected by that plan, to consider the following:



- Drogheda is the largest town in Ireland yet economic development management is from Dundalk and Tourism marketing management is from Navan, both towns would be in competition with Drogheda. It is imperative that the plan makes provision to rectify this anomaly
- Drogheda local authority provision is from two different authorities with two different agendas, previous agreements for the two authorities have failed miserably and there is no confidence that this type of arrangement will achieve anything other than further tearing the town apart
- Drogheda is in a unique position that it is surrounded by high population centres, within a 10 minute journey of Drogheda the population increases from 41K to 100K, The development or collapse of Drogheda will have a direct effect on these 100k people
- In the past 20 years Drogheda's population has increased by 37K people, these people have not been supported by the previous plan and are being further side-lined by the proposed plan
- The Demographic wave from this development will deposit a significant number of graduates on the employment market in Drogheda over the next couple of years , perfectly primed for commercial development of the area, or a mass exodus of capable and committed people.
- Dundalk's gateway status in the previous plan has resulted in available resources in the county being diverted to fulfil the requirements of that plan to the detriment of Drogheda, the recent crippling water crises was a direct result of that imbalance, the current plan copper fastens Drogheda's drought
- Despite the lack of national and local Government supports or leadership, Drogheda and the region has flourished and was the fastest growing area outside of Dublin, this growth has been through the supreme efforts of local volunteers at community and business level, voluntary leadership for a settlement of Drogheda's size is not sustainable.
- The previous plan sought to force expansion and development of a critical mass in towns and cities around the country and failed miserably as the consumer desire was not considered, the current plan seeks to similarly force development into areas beyond the scope of consumer desire and will similarly fail. The result will be a national loss as the industries and employees are globally mobile.

It is a known fact that an area must develop or die, growth rates can be modified to prevent overheating but a negative growth rate will kill a settlement and create significant social difficulties for the town, Drogheda has already grown beyond its status as considered in the plan, if this is not acknowledged in the final plan with a formula for supporting the existing growth and allowing for a sustainable development, the plan will be responsible for intentionally disadvantaging a settlement which is the fifth largest in the Nation.

The most appropriate inclusion of Drogheda in the plan would be:

- An acknowledgement of its status as a settlement well positioned to compete with any of the second tier cities
- The policy to create a local administration in Drogheda with planning, finance and economic functions specifically focused on the 100K people served.
- An acknowledgement of the benefits accruing to Drogheda due to its proximity to Dublin, to Dublin Airport, as the hub and centre of the Dublin-Belfast economic corridor, its motorway and rail infrastructure, its positive local environment and quality of life aspects and its educated and available population
- A consideration of the benefits accruing to the nation of positioning Drogheda as a suitable alternative location to Brexit or other FDI who wish to avoid the difficulties associated with locating in Dublin but require the amenity of proximity to an international airport with daily



flights to all major European cities. These companies are globally mobile and will locate outside of Ireland rather than on the Atlantic arc, as it is not currently sustainable to provide the level of international accessibility from western airports. The Brexit migration will occur in advance of sufficient critical mass developing in the west to generate the required spread of air routes.

As noted above the development of Drogheda has been consumer driven and facilitated by the immense level of business and local community activists but if the current plan is not amended I am quite confident that that activism will collapse due to exhaustion and lack of leadership at national level and will create significant difficulties for the population, alternatively if Drogheda is correctly considered and included in the plan, then the community activists will remain ready and willing to work with the national leaders in developing our town for the benefit of the residents of the town but also the country as a whole.

On behalf of the 100,000 people and future generations I ask that you give serious consideration to this submission and to the submissions from others in support of Drogheda.

Yours faithfully,

Eddie Phelan