



**Drogheda & District
CHAMBER**
A BUSINESS FOR BUSINESS

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

Broughton House
Dunlin Road
Drogheda, Co. Louth
Tel: +353 (0) 9033466
Fax: +353 (0) 9511 500

Dear sirs

Re: Submission of Ireland 2040 our plan

I attach for your attention Drogheda and District's submission in relation to the preparation of the National Planning Framework.

This submission is based on careful consideration of the issues and choices paper and a discussion on the proposed plan and how it may impact on Ireland in general and Drogheda in particular.

Drogheda and District Chamber of commerce welcome the opportunity to have an input into the ongoing considerations in advance of the preparation of a national planning framework to replace the current national spatial strategy.

On behalf of Drogheda and District Chamber of Commerce and the 80k+ residents of Drogheda and district I thank you for taking the time to consider this submission and hope that it will assist in an appropriate sustainable and robust plan for the future.

Yours Sincerely

Eddie Phelan

President, Drogheda and District Chamber of Commerce

Introduction

Drogheda and District Chamber of commerce welcome the opportunity to have an input into the ongoing considerations in advance of the preparation of a national planning framework to replace the current national spatial strategy. The business and residential community in Drogheda are very aware of the consequences on our lives of national plans and policies based on ill-informed or inaccurate or possibly misdirected information.

We recognise that this plan is a high level broad structure policy document however we also recognise that it will set the tone and direction of all subservient plans and if implemented as proposed will force the direction of all subservient plans down to the county development plans and as such will either directly or indirectly impact on the lives of all citizens. For this reason we encourage the plan preparation team to aspire to develop the plan for the entire community and avoid inclusions to benefit political aims whether at party or individual level.

We have included on page 10 a summary of the issues raised in this submission for quick reference.

Drogheda Context

The town of Drogheda is located on the east coast of Ireland and sits on the M1 corridor 35 Km North of Dublin City and 95 Km South of Belfast City. Drogheda is located in and, and the gateway to, the Boyne Valley.

Drogheda as a united settlement has existed for in excess of 800 years and during that time has been a centre of importance in its own right, classified as a city in historical times and was a location for the parliament of the day. Drogheda in the recent past was an important industrial centre with a strong textile industry, in more recent times Drogheda has turned its focus to high value industries including the financial services sector and specifically to the fin-tech area. Drogheda is currently leading the drive towards an M1 economic Corridor stretching from Dublin to Belfast and building on the strength of the existing national and international fin-tech companies located on that corridor.

Despite Drogheda's wealth of heritage and culture, location in the Boyne Valley, the abundance of high quality hospitality cafes, restaurants, bars and hotels and the local tourist facilities of golf courses, beaches and nationally important tourist facilities of Funtasia and Tayto Park, the town has underperformed in the past from a tourism perspective.

Drogheda is, based on the CSO figures, the largest town in Ireland with a population of 38,578 based on the 2011 CSO figures and is expected to maintain this lead in the 2016 figures. The issue of the size and population of Drogheda and district is misrepresented and therefore misleading and will be dealt with in greater detail below.

Drogheda and District Chamber

Drogheda and District Chamber of commerce is a volunteer-led business & enterprise group which seeks to identify the practical ways in which we can approve the general business

conditions in the locality. We have a vision to create more business in the area and energise existing businesses by working together in partnership with elected and non-elected officials, local government and central government to improve the local and national business environment.

The Chamber has been in business since 1894, and has made a consistent and significant impact on business and the locality ever since. We strive to encourage our members to do better business locally, regionally and nationally and we offer local businesses the tools to network, to secure new customers, to drive local economic and social development and we provide a strong lobbying voice to Government.

The Chamber has a membership base of approximately 150 companies ranging from large multinationals to indigenous sole traders and since the abolition of Drogheda Borough Council we find ourselves to be the single institutional voice for the betterment of Drogheda and the region.

We make no apology for our focus in this submission being on Drogheda and the hinterland but we are acutely aware that we cannot exist in a vacuum and what is good for Ireland as a whole will also benefit Drogheda. We are aware however, that Drogheda as an area, has been seriously damaged by the previous National Spatial Strategy and that due to its location and the manner in which it has developed over the past 15 years Drogheda will require specific attention in any new plan.

For this reason we have retained in an addendum the format adopted in the Issues and Choices Paper and have addressed the specific questions raised therein. In the attached specific questions addendum, where possible, we provide commentary on our considerations for the island of Ireland followed by our suggestions in relation to the impact on Drogheda and district.

Ireland context

In order to understand what is currently occurring in Ireland we have to look back at what has happened in the past and where we are coming from.

Ireland, being an island nation which suffered massive depopulation due to the famine between 1845 and 1852, foreign control from 1603 to 1921, civil war from 1922-1923 and outward economic migration thereafter. These events created a population decrease of the 32 Counties from 6.5m in 1841 to 3.1m in 1999. Since 1999 there has been a constant increase in population to a level of 4.76 m in 2016. Despite this increase of almost 54% in the past 16 years, Ireland remains significantly less densely populated than our European neighbours and are ranked 142nd in the table of population densities with 67 persons/Km² in comparison to England at 407/km², France at 116/km², Belgium at 363/km² and Spain at 92/km².

It is anticipated that with the current rate of population increase we could see Irelands population approaching the pre-famine figures of 6.5 million by the end of the period of the national planning framework currently under consideration. It should be noted however

that even with this increase our population our density will still remain below Spain's current density of 92/km² and significantly below England's density of 407/km²

The Ireland which exists for the current increase in population is a considerably different place than that which existed before the famine (1845). In 1845 the vast majority of the citizens would have been uneducated and lived in rural farming locations or on the outskirts of cities in large families and small dwellings and would not have travelled far from their communities. Today's citizens are more mobile, highly educated with smaller families in larger dwellings. The level of education and mobility opens up a global community without significant travel restrictions.

The plan as considered has many goals but it needs to strike a balance between regulating the type and level of development to achieve these goals and ensuring that sufficiently suitable development is allowed to encourage the mobile professionals remain in or locate to Ireland. Due to the low density levels pertaining in Ireland we have the opportunity to be less stringent on our development limitations than our competing European neighbours and in doing so, albeit in a sustainable manner, create a competitive edge for Ireland.

Irish people and communities

The Irish people, most likely due to the series of events listed above, have developed with a strong sense of family, of identity and community. This is part of who we are and in the main we are proud of that fact and wish to hold on to it. The resulting level of family and community support has been an important part of developing a good sense of wellbeing with a reduced incidence of general and mental health issues.

The formulation of family or community linkages is similar for urban or rural communities and is linked to a sense of place. This sense of place is under threat in areas like Drogheda where residential communities have expanded based on market desire but due to inflexibility of local or national governmental policies the required level of support is not provided to allow the generation of local employment and hence the strengthening of local communities. This has been an unfortunate legacy of the previous plan which sought to force development in some areas, in many cases for political gain, whilst the consumer desire was focused on an alternative area. In this sense the consumer could be the individual or the commercial entity. These consumers, being globally mobile, will in many cases if not facilitated in their desired location be lost to the area or lost to the country as a whole.

Drogheda Business Community

Within Drogheda there has been a very strong sense of community at both residential and business level. This strong sense of community was brought into focus during the "Local Heroes" period when an RTE documentary followed the business community pulling itself up during recessionary times. This strong sense of community has been essential for the maintenance and development of employment in Drogheda.

In Drogheda there have been numerous factors mitigating against its development into a sustainable community, these factors are:

- Even though it was the largest town in Ireland it was omitted from the previous strategic plan, this meant that state agencies or commercial entities considering inward investment were pushed away from Drogheda to areas defined as gateways or hubs. There have been occasions where corporate entities voicing a preference for a location in Drogheda were actively encouraged to locate in a gateway or hub to the extent that they were lost to Drogheda and in some cases lost to Ireland.
- Despite Drogheda's status as the largest town in Ireland, during the recent local Government reform, Drogheda's administration, Drogheda Borough Council, was eliminated and all administrative functions and policy generation were moved to Dundalk. Dundalk is a comparable town competing to attract the same economic entities, and now has the power to impact on Drogheda's efforts in this regard.
- As mentioned above, Drogheda has been underperforming in the area of tourism. The development of tourism falls within the remit of economic development within the local authority. In fulfilling this remit, Louth County Council have joint ventured with Meath County Council to market Drogheda as part of the Boyne Valley. This approach made perfect sense as the Boyne Valley is a strong international brand however the administration of that marketing was handed over to Meath Tourism based in Navan. Navan is a comparable town which is competing with Drogheda for prominence as a preferred destination within the Boyne Valley, and now has the power to impact on Drogheda's efforts in this regard.

These factors have presented considerable hurdles in Drogheda Chambers efforts in the creation of employment and the expansion of our tourism industry. We have climbed these hurdles and enjoyed many levels of success, arriving in the main from the volunteer efforts of the business community however the required level of effort takes its toll and many of our "Heroes" have now given as much as they can, we need the maintenance of a strong emerging business community to continue the required work. That is currently not happening as the potential candidates are being pulled to Dublin or further afield for employment thus breaking the connection with the locality. Unless sufficient leadership is provided, and allowed for in the national planning framework, Drogheda will lose its ability to create the type of sustainable community which the current population deserve.

Drogheda has developed as an alternative to Dublin in the past and will continue to do so into the future. The reason for this development is its proximity to Dublin, to Dublin Airport and to the commercial ports coupled with the level of road and rail infrastructural connectivity between the two. At our current stage of development we are at a crossroads and the Government of Ireland has a decision to make, it can continue to ignore Drogheda with the result that it will become a dormitory town of 80k+ people devoid of a sustainable business or residential community with the resulting social difficulties that will entail or alternatively it will recognise that Drogheda has developed to its current extent and provide a sufficient level of support to ensure a balanced development of the town with local

employment and a strong sustainable community building on what has one before to create a world class urban settlement.

For a recent meeting with Minister Simon Coveney, Drogheda Chamber produced an infographic which explains this path and the possible outcomes of the decision taken. A copy of the infographic is included as an addendum to this submission.

The Irish planning and political system

The Irish planning and political systems are intrinsically linked and necessarily so in some cases but this linkage has its difficulties. Many of the hurdles noted above and the powers accruing to competing adjacent towns can be tracked back to a stronger political champion based in that town in the past rather than a sustainable planning consideration, even the current consideration of a strong eastern zone of development and an attempt to push development to an Atlantic Arc has all the hallmarks of similar political pressures.

The development of the east coast has occurred due to the provided infrastructure of road rail, air and sea, with most of this infrastructure extending out in a hub fashion with Dublin at its centre, in addition the east coast is closer to our trading partners in the UK and Europe whereas the west of Ireland faces onto the expanse of the Atlantic Ocean. This has been a natural form of development and to try and force a different direction will most likely endanger the overall rate of economic development of the nation.

The creation of an infrastructure link between Galway Limerick and Cork can only be justified when the level of commercial activity requiring such a link requires it. A motorway from Galway to Cork will not have a significant impact on the level of commercial activity between the two centres and whilst desirable for the convenience of the residents in both centres it will not represent a justifiable use of the taxpayers money unless the demand is already there.

The question has been asked, "What will Ireland be like in 20 years' time?" It's a fundamental question that no one can answer for sure but what we can say with certainty is that in that 20 years there will be at least 4 changes of government there may be 2-3 economic cycles and the population will most likely increase.

The fact is that we have not always grasped the opportunity that good forward planning can give. This has stopped us from reaching our full potential in economic, social, cultural and spatial terms. If the current plan is not strongly fixed in sustainable consumer desire lead development patterns then with each change of government and each economic cycle the plan will be twisted and distorted and will, in the same manner as the national spatial strategy, fail miserably and become a millstone around the necks of the citizens of Ireland.

When local planning, as dictated by the county development plan, is considered the planning system and its link to the political system creates the greatest difficulty. This is especially true for Drogheda where the planning of our town is being torn between Louth County Council, Meath County Council and the elected members within the Borough District of Drogheda. This has resulted in extensive development on the periphery of the town without reference to the health of the town as a whole, and the resulting development

contributions being extracted to fund infrastructural supports in other areas leaving deficits in the developed area.

Economic Development

It is important that we accept that the same level or even type of growth can't and shouldn't occur everywhere, there will have to be some degree of prioritisation of support to developing communities and some hard choices and political leadership will be necessary. So too will be the need to replace the concept of balanced regional development with the idea of effective regional development - playing to strengths rather than assuming that a single model suits all areas

The principal purpose of economic success is to ensure sustained improvement in living standards and quality of life for all of our citizens. This also provides the best possible platform from which to pursue key social and environmental goals, such as supporting and protecting the development of strong communities with a strong identity and sense of place.

Growth and change will occur irrespective of whether there is a National Planning Framework in place or not and will further impact the spatial pattern of development in Ireland. In the absence of an agreed and effective National Planning Framework which is focused on putting people first and the administration second, it is likely that current trends in terms of a disconnect between the location of consumer desire lead development and the allocation of the required supports.

It is likely that irrespective of the limitations imposed by a ruthless, politically motivated plan there will continue to be an increased concentration of population and economic activity in the East of the country and rural areas less accessible to cities and larger towns are more likely to experience population decline. The question has to be asked if this is a good or bad thing, the decline of population in rural areas renders more lands available for agricultural activity and the increased level of population in areas accessible to large cities and towns provide for a more sustainable model in relation to the provision of services. In contrast to settlement, the spatial pattern of employment is mainly focused on the urban hierarchy of cities and large towns as employers are increasingly likely to locate where there are larger pools of labour, for this reason the support of employers seeking to locate in towns should be increased

Population of Drogheda and district

The population question has been previously mentioned and it is an issue which has generated considerable discussion and argument. The population of Drogheda could be cited as 30,393 or 38,578 or 52,205 or 83,042 and in all cases you would be correct, however for the consideration of Drogheda as a settlement and the production of appropriate policies for that settlement the most appropriate figure from the selection above should be used.

The figure of 30,393 represents the number of people residing within the town boundary during the 2011 census, this boundary has been superseded for quite some time by the development of Drogheda in all directions (north, South, East & west) but there has been resistance in many quarters to its correction. The rate of increase of population associated with this figure is less than 1%, simply because the complete area is developed and there is no further scope for population increase, that increase is occurring outside the town boundary. Unfortunately, the figure of 30,393 and growth rates of less than 1% has been inappropriately used, whether intentionally or unintentionally for the development of policies and strategies and policies for Drogheda's development.

The figure of 38,578 represents the number of people residing in all residential estates in Drogheda both inside and outside the town boundary but contiguous with the town, the area associated with this figure has a growth figure of almost 10% between the 2006 and 2011 census. It is clear to see that if this population and rate of growth are used a completely different picture emerges and the policies required should reflect this.

The population figure of 52,205 is produced from a study completed by Dr. Brian Hughes using the harmonised European Union methodology for determining settlement populations using an evidence based grid analysis on the 2011 census figures and considering the agglomeration with the adjacent settlement of Laytown-Bettystown-Mornington (L-B-M). The population growth for this area between 2006 and 2011 is estimated at in excess of 15%.

The final figure of 83,042 is also taken from Dr. Hughes' analysis of the census figures and represents the preliminary 2016 figures for the Drogheda L-B-M agglomeration and including the adjoining Meath and Louth rural areas. At this level, the region has a population in excess of the cities of Waterford (51,517) and Galway (76,778) and twice the population of the entire county of Longford.

(A copy of Dr. Brian Hughes study is included in a separate submission to the plan by the City Status group and will not be duplicated in this submission unless specifically requested.)

The reason Drogheda and district's population is so high is that not only is Drogheda highly populated but it is adjacent to and the economic driver for a number of smaller highly populated towns and villages.

For considering the required supports to a town like Drogheda it is important to realise that it is the hub and economic driver for a population of 83k people with a growth rate from 1996 to 2011 of 78.77 which is 2.5 times the national growth rate for the period.

Irrespective of whether the noted level of growth and population is deemed appropriate or not, the political leaders must accept that it has happened and it must be facilitated. To introduce policies which guillotine the development of a rapidly expanding region like Drogheda would be negligent towards the citizens in the region. The region now requires an analysis to see what infrastructure and investment is required to ensure its development is balanced and that sufficient administration, healthcare, education, employment and

recreation facilities are in place for the residents and the demographic wave which will follow such rapid expansion.

Based on Drogheda's population it is imperative that it receives specific attention in the plan with safeguards to ensure its orderly continued development as a prominent settlement/Town/City on the east coast can be facilitated in an orderly fashion

Infrastructure and Facilities

When considering areas suitable for the creation of sustainable communities consideration must be given to the level of infrastructure existing and that required to be provided from the public purse in the pursuit of that policy. In this respect, Drogheda and district would have a considerable advantage ahead of many other centres. The infrastructure provision in Drogheda has been ahead of its time, despite the lack of recognition provided by the previous plan. This level of existing provision provides an excellent basis to start with the infill infrastructure required for the development of a sustainable growth centre which will not compete with Dublin but will run in parallel and in doing so reduce the pressure on the capital allowing both centres to develop to their full potential.

When considering Drogheda, and the elements which have proven a strong draw for residential communities in the past decade we have to be aware of both the natural occurring infrastructure and the infrastructure which has developed as a result of private or public investment.

The natural occurring infrastructure in the region exists in abundance and provides a backdrop to the quality of life afforded to residential communities in the area. These elements include the wealth of heritage afforded by Drogheda's position as gateway to the Boyne Valley including treasures such as Newgrange, Oldbridge and the Battle of the Boyne site all within walking distance for the town centre. Within the town centre we also have the Millmount complex, one of the worlds finest Martello Towers and Laurence's Gate, one of the best examples of a Barbican Gate embedded in remaining sections of the ancient town wall to mention but a few. We also have the majestic Boyne River and the associated flora & fauna, and the extensive beaches of Laytown, Bettystown, Mornington, Baltray and Cogherhead. It would be impossible to put a monetary value on these assets but you can be assured that the cost to replicate them in an alternative location would be prohibitive to the extent that it would be considered impossible. A further element of a naturally occurring asset is Drogheda's proximity to Ireland's Capital, Dublin. Located 40km North of Dublin City Centre, Drogheda is sufficiently close to the capital, with significant transportation links, to allow Drogheda residents enjoy the cultural and commercial activities within the capital without the cost and difficulties associated with living in the city.

The developed infrastructure in Drogheda and the region is no less impressive and breaks down into the spheres of, Transportation, Data Connectivity, Healthcare, Education and public utilities.

In the area of transportation Drogheda boasts it's own commercial sea port providing access to all international ports and handling in excess of 1 million tonnes of product annually.

Drogheda's train station is on the Dublin-Belfast line and is a high speed rail line which currently provides 34 trains each way, each day between Dublin and Belfast with some journey times down to 32 Minutes. The capacity of this line is only limited by the capacity of the DART section between Howth Junction and Connolly Station, this DART limitation could be removed, if required, by an adjustment of headroom lengths to international norms.

Drogheda, like many other centres is well served by motorway infrastructure with considerable retained capacity due to recent expansions from Lissenhall to the M50 however unlike other centres our M1 motorway infrastructure not only links Drogheda to the M50 and Dublin within 25 minutes but also links Drogheda directly to Belfast, Ireland's second largest city only 60 minutes away. Drogheda also benefits from having 5 dedicated intersections off the motorway (junction 7 to Junction 11) providing efficient access to the northeast, northwest, west, central and south Drogheda.

Probably the most appealing aspect of Drogheda's infrastructure is the availability of an international airport located just 25 minutes to the south, again many centres will indicate similar proximity to airports however for the consideration of the development of an international business it is not just the airport but the availability of direct flights to their parent city. Dublin Airport, on Drogheda's doorstep, boasts direct flights to 185 destinations in 41 Countries on 4 Continents and businesses located in Drogheda have easier access to those flights than any other comparable centre. Even Dublin city due to its traffic congestion cannot boast such ease to international connectivity.

In the current modern business world, secure fast data connectivity is essential and in this respect, whilst other centres are catching up Drogheda is leading the field in relation to data connectivity with in excess of 100MB fibre connections currently available to the business and residential community and 1GB connectivity into some business centres. In addition to the necessary high speed connectivity Drogheda can also boast an additional benefit to companies where security of connection is essential, and that is the level of redundancy provided by providers operating on more than one network. In many centres even though there may be numerous providers they are sharing a single network with the potential that a network failure could result in a loss of service, a second network has been brought into Drogheda by Virgin media allowing security of continuity for critical data operations even with a catastrophic failure on one network.

In the area of healthcare, Drogheda's status in this area has been progressing over the past decades, with the Lourdes Hospital serving as the regional hospital for the North East providing acute, emergency, maternity, oncology, palliative and infective disease medical care among others. The hospital is affiliated to the Royal College of surgeons. In addition to the regional hospital Drogheda is served by numerous primary care facilities and nursing homes providing the required full range of care required.

The educational infrastructure in Drogheda and the region has benefited greatly by being classified as a high growth centre by the Department of Education. This has resulted in a significant level of continuing investment in schools and facilities at all levels in the area and the development of state of the art Primary and Secondary school campuses. In addition to

Drogheda's local college of further education the secondary school leavers from the area have an array of college facilities available to them including DKIT, DCU, UCD, DIT and Trinity with direct train or bus services to these centres.

The final area of infrastructure available to Drogheda is public utilities including Electricity, Water and Wastewater, and waste disposal. The development of these utilities has allowed for significant capacity to accommodate a population in excess of 100,000 people without a requirement for expansion. The municipal wastewater treatment plant in Drogheda was developed in 2004 and upgraded in 2007 to provide primary, secondary and tertiary treatment for a population equivalent of 100,000 persons. The water supply and treatment facilities in Drogheda are similarly operating at significantly less than capacity to the extent that it is capable of facilitating large areas of Meath also with high quality potable water. Drogheda is also fortunate to have the Indavar incineration plant located on our doorstep providing a facility to sustainably dispose of all refuse arising which cannot be recycled and to feed the extracted energy back into the national grid.

In the consideration of the development of growth centres in Ireland it is essential that Drogheda, which already has the required infrastructure in place and is a desired location for residential and commercial development, be considered ahead of other centres where additional financial resources need to be expended and excessive encouragements are required to force development.

In summary, when considering the formulation of the national planning framework it is essential that the plan allows for:

- The reinstatement of Drogheda's ability to make the correct decisions in economic, community and tourism matters for the betterment of the 80K+ population affected by its development and activities.
- The inclusion of the M1 Economic Corridor in the plan as an aspiration for a supported cluster of world class Fin-Tech companies
- To allow Drogheda to continue to develop in a balanced manner with the development of the current planned northern and southern Environs and sufficient employment generators to retain a strong sustainable business and residential community.
- A review of the current infrastructure provided in support of the proven population and the required investment out of the development contributions to make up the deficit

On behalf of Drogheda and District Chamber of Commerce and the 80k+ residents of Drogheda and district I thank you for taking the time to consider this submission and hope that it will assist in an appropriate sustainable and robust plan for the future.

Yours Sincerely



Eddie Phelan

President, Drogheda and District Chamber of Commerce

Addendum A – Response to issues and choices paper

Within the issues and choices paper the following are represented as targets, this is premature as it pre-supposes, in advance of proper consideration of the issues and all submissions, that these are indeed targets to be aspired to, in some cases they may be but in other cases they should be avoided for the betterment of Ireland as a whole. Indented below the suggested targets are the comments on each from Drogheda Chamber of Commerce

- Facilitate improvements to people’s quality of life and well-being;
 - *This is a noble aspiration and in keeping with the policy of putting people first.*
- Prevent further overdevelopment and sprawl;
 - *Care should be taken with this consideration, as noted in the body of the submission Ireland’s density is quite low and that is an opportunity, if we force unsuitable accommodation simply to provide more compact development we will lose the quality of life edge when trying to encourage or retain highly mobile professionals and commercial entities*
- Encourage population growth closer to where employment is located and is likely to be;
 - *This is the tail wagging the dog, to maintain a suitable quality of life population growth will follow consumer desire, sustainable development of employment close to the population growth makes more sense.*
- Identify and support employment potential throughout Ireland, including greater regional employment growth;
 - *Employment is a necessary element for the population, if the population has located in one location forcing employment in an alternative location simply to satisfy an idea of balance and forcing the population to relocate or commute does not make sustainable sense and negatively impacts on the development of strong communities.*
- Identify measures to encourage both rural and urban regeneration to address decline;
 - *Rural decline should not necessarily be seen as a negative, the reduction of populations in rural areas is beneficial to the development of a healthy agricultural economy*
- Achieve effective regional development;
 - *Care must be taken with this item, the commercial entity is a consumer with consumer desires when seeking a location, if not facilitated in the desired location there is a considerable danger of complete loss of the entity*
- Relieve development pressure on the Eastern part of the Country whilst protecting the key role played by Dublin;
 - *Care must be taken with this item, the commercial entity is a consumer with consumer desires when seeking a location, if not facilitated in the desired location there is a considerable danger of complete loss of the entity*
- Ensure good environmental stewardship by avoiding any further deterioration and addressing existing deficiencies;
 - *The protection of our resources is a worthwhile mission but each approach must be assessed to ensure its implication is not negatively impacting on other scarce resources*
- Reduce carbon emissions;
 - *This is also required however cognisance must be taken of the whole life cost of the approach to ensure the reduction is real.*

- Prioritise the development of infrastructure that can deliver national benefit – including renewable energies;
 - *This is a positive approach however cognisance must be taken of the whole life cost of the approach to ensure the benefit stands on it's own and is not propped up with subsidies*
- Harness the planning system in order to maximise the role it can play in relation to climate change;
 - *This is a positive approach however cognisance must be taken of the holistic return of the approach to ensure the benefit stands on it's own.*
- Manage the planning and development process so that the right development occurs in the most suitable places and at the right time, ensuring sustainability and best use of scarce resources.
 - *Care should be taken with this consideration, as noted in the body of the submission Ireland's density is quite low and that is an opportunity, if we force unsuitable accommodation simply to provide more compact development we will lose the quality of life edge when trying to encourage or retain highly mobile professionals and commercial entities*

In the area of Health and wellbeing and population aging the following questions were posed:

- Are we prepared to make changes now so that a 'healthier places' legacy can be handed over to the next generation of Ireland's citizens?
 - *Yes but those changes should be based on solid verifiable evidence and not on exaggerated claims. It is not sustainable to waste scarce financial resources on potential issues in the future, it is more beneficial to invest the funds addressing known issues*
- What policies can the NPF include to effect improvements to our general health, including physical and mental wellbeing, in Ireland over the next twenty years?
 - *The support and maintenance of strong communities in residential and business spheres*
- Are there key priorities the NPF can identify to ensure better or improved health and wellbeing of people and places in Ireland?
 - *A stronger approach to the quality of life associate with developments including suitable range of accommodation and recreational facilities*
- Are there facilities that the NPF needs to highlight for places in Ireland in order to enable greater participation in a healthy lifestyle?
 - *Greater access to our natural heritage for all including introduction to the great outdoors for school children*

When considering cities and regions it was noted that If Dublin is underperforming, Ireland is underperforming. Should the Dublin City-Region suffer a loss of competitiveness and become a less attractive place in which to invest as a result of housing and infrastructural bottlenecks, investment and influence will inevitably be attracted to other similar city regions in Europe or elsewhere, for this reason consideration should be given to allowing centres like Drogheda develop as an alternative to Dublin and hence reduce the bottlenecks however development must be carefully planned in a sustainable manner.

A common theme running through the issues paper is that Ireland's regional cities appear to offer significant potential to be the focal point to drive growth and development in their regions. The regional cities are all major centres of employment, third-level education and healthcare and are accessible to the motorway network and other communications infrastructure such as airports and ports. This is somewhat correct however the level of potential is limited and this is attested to by the reduced level of development in comparison to the development in the east. If an attempt is made to force development into these cities that can only be seen for political gain and will have the effect of losing development to Ireland as a whole, the consideration of consumer desire must prevail and be respected.

At the tier below the cities, there are a number of towns which, due to their level of service provision and extensive catchments, serve an important role for those areas that fall outside the reach and influence of the cities. In some cases, they can complement the role of the city. However, lessons from the past suggest that if we continue to focus on multiple towns, this will continue to undermine the performance and potential of our cities and ultimately the wider region. *This is part of the legacy from the national spatial strategy and it could be seen that the areas identified for development did not proforma whereas areas omitted from the system such as Drogheda developed in spite of that omission. The plan preparation must study areas of development where that development occurred based on their own benefits and put the supports in place for these areas to encourage further sustainable development.*

Questions Cities & Towns

- Taking on board all of the relevant environmental and physical capacity issues, what role should our cities have as part of the NPF?
 - *Cities and towns should be allowed develop based on their potential and supported in doing so, forced development to satisfy a regional political requirement will be detrimental to the country as a whole*
- How might we develop one or more strong regional complements to Dublin that can address their whole city-region, including interactions between settlements
 - *The development of the M1 payments corridor would be a strong complement to both Dublin & Belfast*
- Do we need to reform and strengthen administrative and governance structures so that they are capable of delivering the necessary alliances, collaboration and actions to build up our cities and their regions?
 - *Administrative and governance structures should be reformed to put the citizen at the centre in accordance with putting people first and the self servin of the administration should be much further down the line*
- How might we develop an urban policy that distinguishes between development within the existing built-up area of cities and towns and greenfield development sites?
 - *There are citizens who have a preference for urban living and those who prefer suburban living, the development of suitable accommodation within urban areas without the requirement for car based storage would assist developing this approach.*
- How might we distinguish between the role of towns within the wider hinterland of the cities and those located outside the influence of the cities?
 - *It has to be seen that the influence on towns like Drogheda is it's proximity to Dublin and it should be allowed develop as such, whereas towns like Edenderry or Tullamore*

are influenced by their rural local, it does not make sustainable sense to force development in rural towns is the desire is to locate in urban influenced towns

- What measures could be used to examine potential densification scenarios that may be applied to parts of existing urban areas?
 - *If densification of an area is to be considered it should be accompanied by appropriate facilities and the costs reduced in order to provide a higher quality living space*

The next section on regional balanced development poses the following questions:

- What are the levers for effective regional development?
- What is needed to be done to increase human capital at a regional level?
- What regional 'value proposition' i.e. an innovation, service, or combination of measures and approaches can make the regions more successful and what are the means by which this can be achieved?
- Are there strategic issues (i) across local authority boundaries or (ii) on an inter-regional basis, that the Regional Assemblies can co-ordinate to ensure more effective sub-regional and regional outcomes?
- Are there funding opportunities than can support investment on a regional basis?

As a single answer to all of these questions is the return question of what is the reasoning behind forcing regional development. If we are trying to force development in a rural area such that a school or post office remains open, it may be more cost effective to increase the subvention to these facilities if their presence is desirable and allow the development occur in the location that the consumer desires. If the reason behind forcing regional development is to placate political whims then the plan is lost before it starts.

Questions – Rural

- How can the NPF capture (in a national, strategic policy context) the range and quality of resources that exist in rural areas that could be leveraged to support national economic growth, climate action objectives and the development of local communities?
 - *No response to this item*
- What are the solutions to maintaining population in those rural areas where decline has been experienced?
 - Should decline be resisted, as a rural area a reduction in population may be beneficial.
- What role should towns and villages in rural areas play in catering for Ireland's future growth?
 - *Towns and villages are important hubs for supporting agricultural activity in rural Ireland but agricultural issues should maintain the priority, persons locating in rural villages and expecting urban services should not be tolerated*
- How can the rural parts of Ireland close to urban areas be protected from development pressures that are likely to arise to accommodate further population growth?
 - *If the decline in population in true rural areas is allowed that will free up agricultural lands close to urban areas to allow sustainable development for future population growth*

- What measures need to be in place to allow those who have a genuine need to live in the countryside to be accommodated?
 - *Persons who wish to live in the countryside and who are willing to contribute to the enhancement of rural Ireland should be facilitated however the additional costs of the provision of essential services to those facilities should be borne by the person rather than the state.*

Cross border questions

- How can the NPF facilitate co-ordination between settlements that share connections across the border between Northern Ireland and Ireland and how should this be reflected in the document?
- What economic opportunities and sectoral clusters exist that can benefit economies within both jurisdictions and how can this be best captured and supported in the NPF?
- What mechanisms are needed to ensure a joined-up approach to strategic infrastructure and investment decisions that have a cross-border dimension and are there examples of best practice?
- How do we co-ordinate mutually beneficial ways to address common environmental challenges across shared catchments?

As a single answer to these questions, it is virtually impossible to adequately cover cross border issues in a plan which will stretch to 2040 and to try will waste resources, it would be more prudent to allow a review of this area of the plan after the final exit of the UK from the EU when it is known what limitations on cross border traffic and trade will exist.

Coast & Marine questions

- In thinking about what Ireland might look like in twenty years' time, what is the future for the Ireland's coastline, islands and offshore?
- How can coastal and island communities contribute to a national vision for Ireland, as part of the NPF?
- How can the goals of the integrated Marine Plan be spatially represented in a National Planning Framework?
- What policies, measures or actions need to be advanced to enable Ireland's marine resource to adapt to the effects of climate change (e.g. coastal erosion, flooding, sea level rise etc.)?
- What infrastructure investments need to be made in order to maximise the sustainable potential of our ocean resources?

We are not sufficiently informed in costal on marine issues to formulate a response on this

Environmental questions

- How can the NPF help to ensure we get a sustainable balance between catering for a growing population and avoiding or addressing environmental pressures?
 - *A holistic whole life sustainable approach must be taken in the development of the infrastructure required.*
- How do we plan for growth in such a way that supports a transition to a low carbon and climate resilient economy and what planning policy measures are needed to achieve this?

- *A holistic whole life sustainable approach must be taken in the development of the infrastructure required with reliance on verifiable processes*
- What strategic energy infrastructure is needed to support the economy and society and realise the transformation of Ireland's energy system to meet climate change and energy obligations and in what areas should it be located?
 - *Consideration should be given to a linkage to an international grid to allow balancing out of production and supply. Technologies which are not proven to be effective without supports should not be implemented*
- Are there any other national environmental issues that you think should be included within the NPF and that are within the remit of planning policy?
 - *The provision of cycling and walking facilities as an integral part of development, in addition the nations public transportation should be integrated with the customer at it's centre.*
- An SEA scoping document has been developed in tandem with this paper. What are the relevant significant issues to be addressed by the SEA, AA and SFRA and what environmental objectives should be used?
 - *All relevant issues appear to be identified*
- What measures should be implemented in order to safeguard our landscapes, seascapes and heritage and ensure that Ireland continues to be an attractive place to live, visit and work?
 - *With the consumer at the centre development in sensitive areas will protect landscapes, seascapes and heritage*

The NPF will be relevant to strategic national infrastructure that can influence the spatial pattern of development and contribute to national objectives in areas such as transport, water, wastewater/ flooding, waste, climate action, broadband/ telecommunications, energy, health, education, community and tourism. It is essential that the focus of the plan on the provision of these facilities is not politically driven and is carried out for the benefit of citizens rather than institutions.

The provision of social infrastructure, commensurate to the location and scale of a settlement or locality, is also central to supporting sustainable vibrant communities that cater for all life stages

To ensure a strategic approach to infrastructure provision at a national scale, the NPF will provide the spatial background against which investment decisions can be prioritised, to collectively form a strategy and enable a range of strategic medium and long-term projects to be aligned and sequenced. This will commence with the mid-term review of the current Capital Plan to 2021, which will overlap with the initial period of implementation of the NPF.

The provision of Infrastructure questions posed are:

- What are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years?
 - *The maintenance of a good road structure and the inclusion of sufficient facilities throughout the network*
 - *The expansion of broadband throughout the country*
 - *The maintenance of a good quality water supply In a secure delivery network*
 - *The maintenance of an efficient power network*
- What do we need to do to make best use of existing infrastructure?
 - *Proper scheduled maintenance based on need and managed by engineering professionals rather than administrators*

- How can we ensure that ensure that the provision of infrastructure can be planned to match future demand and how can the NPF reflect this?
 - *Robust analysis of CSO data and the use of professionals such as Dr. Brian Hughes to indicate trends so that planning can be completed in advance of requirements*
- How can capital spending on new infrastructure be sequenced in a way that is affordable and equitable, while taking account of Ireland's Climate Change obligations?
 - *If the infrastructure requirements are determined based on evidence and engineering assessments and designed accordingly with efficiency at the fore the result will be cost effective and sparing of essential resource, the inclusion if infrastructure based on political pressure should be resisted.*
- How do we ensure that existing and new development can be supported by the timely provision of social infrastructure?
 - *In lieu of the payment of development contributions the social infrastructure could be provided by the developer, this would produce a more efficient and cost effective approach*

Drogheda into 2025 - Opportunity or Threat

We are at a crossroads...

The right decision will benefit will beyond Drogheda's boundaries.



Drogheda & District
CHAMBER
OF TRADE & BUSINESS

Population has increased

In Drogheda with resulting pressure on Primary education from the mid-90s and on secondary education soon after, then on third level access from 2000s - this wave of young graduates are now seeking employment and this pressure on the system will continue to increase over the next couple of years.

Drogheda's development has been **stunted**

for the past 15-20 years due to administration control being held in remote competing towns and to a lack of support from central government.

Irrespective of this resistance Drogheda has **developed** into the largest town in Ireland, and coupled with the adjoining east Meath area has been the fastest growing region outside Dublin.

Drogheda's success in the face of resistance is primarily due to the strength and quality of the community and business activists who are **determined** to achieve a high quality of life for those in the region

This external resistance has created an **opportunity** ripe for positive exploitation, or a cancer which will overrun the ability of the town to realise its potential

Due to the limitations applied to Drogheda's development it has been **underachieving** in job creation and in its tourism potential. Like a taut spring when released the potential for rapid advancement is great.

Driving Drogheda's commercial and tourism potential has been a hard fought battle for the local voluntary groups and individuals with very little local or central government support. These drivers are now **exhausted** and without the prospect of support the driving ethos is being eroded and undermined.

So what is the decision and probable outcome?

Provide the required leadership

Retain the status quo

Provide the required leadership

Recognise Drogheda for the size of its population and its development potential in the areas of job creation and tourism. Ensure it is included as the largest town in Ireland in the national planning framework, and ensure the appropriate central Government supports are applied

Due to the fact that Drogheda's development has been restrained the application of suitable supports will herald a **rapid development** in the area of job creation and tourism, a sufficient number of the entrepreneurial generation will be engaged locally, will develop their roots in the town and will help develop a positive community, in a newly discovered City with the ability to deliver a world class living and working environment.

Retain the status quo

Omit Drogheda and its population from consideration in the national planning framework and continue to consider it as a supporting town to Navan and Dundalk.

Allow decisions for Drogheda's commercial and social development to be made in Dundalk, a town competing for such development and decisions. Leave Drogheda's tourism development decisions to be made in Navan, a **competing town** for prominence in the Boyne Valley

We have an opportunity to decide which outcome we want!

The entrepreneurial generation leaving college will seek employment elsewhere and this group will not be available to engage as community and commercial activists, the graduates remaining will require support and are **not likely** to be net contributors to society.

What is needed to ensure the correct path is followed?

Leadership from Central Government
Inclusion of Drogheda in the National Planning Framework
Recognition of Drogheda's size and status - Consider City Status
Consider Drogheda's Boundary review in light of the potential opportunities
Relocation of Drogheda's administration away from competing towns
Provide visible bases (and support) for IDA, Enterprise Ireland and LEO in Ireland's Largest Town

What will Drogheda's community do to help this process?

Maintain our commitment to the development of the town as a thriving commercial and tourist location and a living community
Engage with and support the efforts of local and central government and their agents
Provide feedback to Central Government on progress and share our experience with other communities
Give credit where due and acknowledge the foresight and political strength of the individual or group willing to take this leap of faith with us

Drogheda will become a dormitory town
wasting its tourism and community **potential** and allowing the type of social difficulties which thrive in this type of environment



Drogheda & District
CHAMBER
COMMUNITY BUSINESS