



Comhairle Contae Lú
Louth County Council

NPF Submissions
Forward Planning Section
Department of Housing, Planning,
Community & Local Government
Custom House
Dublin 1
D01 W6X0

31st March, 2017

Re: Ireland 2040 National Planning Framework

A Chara

Attached please find Ireland 2040 National Planning Framework Issues and Choices Paper Response submission by Louth County Council.

Mise le meas

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Cuirfear fáilte roimh chomhfhreagras Gaeilge - Correspondence in Irish is welcome



Comhairle Contae Lú
Louth County Council

Ireland 2040

National Planning Framework

Issues and Choices Paper Response

Submission by Louth County Council

31st March 2017

Vision

The complementary large towns of Drogheda and Dundalk acting as growth engines for their Louth hinterland and as sustainable national growth centres, within the context of a Dublin metropolitan spatial plan for Dublin City and its region, while exploiting their strategic location along the Dublin / Belfast Economic Corridor.

Introduction

This submission on the National Planning Framework: Ireland 2040 Our Plan Issues and Choices has been prepared by Louth County Council. The submission primarily addresses the Issues and Choices paper circulated for public consultation. The methodology adopted in the preparation of this submission was to consult within the original challenging timeframe [submission date 16th March, 2017 subsequently extended after the conclusion of the Louth consultation to the 31st March, 2017] with the executive and the elected members of Louth County Council in order to prepare an evidence-based, informed and coherent response to the circulated NPF Issues and Choices paper. The management team and senior staff of Louth County Council participated in a half-day workshop using the framework of 10 questions relating to the circulated NPF Issues and Choices paper. The output of the workshop is a list of strategic issues as they relate to the County of Louth, the East and Midland Region and the cross-border Dundalk/ Newry area extending from Dublin to Belfast. Subsequently, a workshop of the both elected members and non elected Strategic Policy Committee members discussed the 10 questions linked to the identified strategic issues and the outcome of that workshop forms the body of this submission.

This submission also includes additional commentary around a vision for County Louth as a component part of the East and Midland Region defining the County's role in a sustainable spatial strategy for Dublin and its metropolitan hinterland to the horizon date of 2040 and beyond. This vision is informed by the pivotal geographical location of County Louth within the primary economic corridor on the island of Ireland – the Dublin Belfast corridor, the unique opportunity afforded by the two largest towns in the State of Drogheda and Dundalk as sustainable growth centres, and the need for effective regional development in Dublin and its metropolitan hinterland as an integral part of the NPF - where existing and projected growth would be guided into a network of sustainable connected growth centres creating a polycentric Dublin city region.

It is stated that the NPF will be a champion of effective regional development. It is acknowledged that collaboration among a broad church of stakeholders including land use managers and sectoral agencies will be required to achieve this goal nationally and in the East and Midland Region including in County Louth. In Louth, collaboration is required at local, county, regional and national level to achieve strategic and mutually beneficial goals – citing in specific the opportunities and treats presented by Brexit. **To this end this submission is forged in an understanding that Drogheda and Dundalk as complementary sustainable urban growth centres will drive growth in their hinterlands throughout County Louth and beyond, while simultaneously fulfilling their role as sustainable national growth centres, within the context of a Dublin metropolitan spatial plan, accommodating projected economic growth to 2040.**

Issues and Choices – 10 Question Responses

The questions below are generated from the Issues and Choices paper. The responses are prepared in the Louth context the focus of the consultation within the County. However, it is acknowledged that many of the issues / observations highlighted below will be common across the Eastern and Midland Region and the State.

1. What should Ireland look Like in 20 years time?

- Dublin will remain the principal growth centre on the island of Ireland fully realising its potential as a European capital city, highly desirable international destination for investment and talent and global city.
- Drogheda and Dundalk are sustainable national growth centres within the context of a Dublin metropolitan spatial plan for Dublin City and its broad hinterland.
- Louth will be an integrated part of a coherent connected Dublin metropolitan region of sustainable regional centres extending along the radial rail network from Dublin City. Drogheda and Dundalk strategically placed within the Dublin metropolitan region and along the Dublin / Belfast corridor will fulfil their role as complementary consolidated urban growth centres forming a linear gateway between the Dublin metropolitan region and the north-east of the island of Ireland.
- The role of Drogheda and Dundalk within the region and nationally as national centres of employment and settlement will be further complemented by their role as growth engines for their hinterlands in county Louth and beyond extending into the north east of Ireland.
- A Louth development strategy housed within a metropolitan regional context exploiting its geography in proximity to Dublin and location along the primary economic corridor on the island the Dublin / Belfast axis is a viable and sustainable growth framework for the County and has provided for the sustainable development of the towns of Drogheda and Dundalk, and all smaller towns and villages in the County and the extensive rural hinterland.

2. How do we ensure that every place can realise its potential?

- Louth has a number of comparative advantages in geographic location, accessibility, strong urban centres, high quality environment, young demographic, potential affluent older population, latent tourism potential, spare infrastructure capacity for example in water services , human capital and talent.
- The People of Louth are recognised as the significant resource of the County. It is acknowledged that if people in places don't realise their potential then the place will not realise its potential. Promotion, positivity and persistence are required.

- The realisation of potential will need to focus on the consolidation of the towns of Drogheda and Dundalk, in a collaborative strategy, acknowledging their commonality and exploiting the unique characteristics of both towns, to enhance comparative advantage nationally and internationally. In fully realising potential a focus on the rural hinterland, smaller towns and villages and their relationship with the special ecological, environmental and heritage assets of the County will complement the opportunities within the 2 larger towns.
- The realisation of latent potential will require co-ordinated and coherent actions in order to realise the full potential of town centres and the rural hinterland. This can be achieved through integrated planning in the preparation of local area plans.
- The protection, enhancement and marketing of the coast and waterways is required to realise the potential of the marine territory, the coast, rivers, ports, canals and other water courses.

Where will jobs be located and what kind of jobs will they be?

- Louth has a number of comparative advantages in the attraction and retention of employment including its geography proximate to the deep Dublin labour market, a labour force within 45mins commuting distance of Drogheda and Dundalk greater than the other cities in Ireland, strategic location on the Dublin / Belfast corridor linked by the Euro Route Motorway and north-south railway, ease of access to international airports in Dublin and Belfast, the attraction of clustered opportunities and services in the largest towns in the State in Drogheda & Dundalk, excellent broadband, high quality environment, rich heritage, educational centres of excellence and a proactive 10 point economic plan comprising a supportive and pro-business environment.
- Jobs will locate where jobs have located previously (clustering effect), principally, in Drogheda and Dundalk in terms of inward investment. However, indigenous jobs growth may be located throughout the County with particular opportunities such as tourism, marine and food processing, new job roles created by new technologies and by an aging population.
- Exploit the opportunities afforded by an aging demographic in terms of job generation through development of the caring sector (primary care, caring at home, nursing homes etc), and leveraging the quality research being conducted at DkIT's Netwell (Social Networks, Environments and Technologies for Wellness and Ageing-in-place) and CASALA (Centre for Affective Solutions for Ambient Living Awareness) research Centres of Excellence.
- Louth's comparative advantage in tourism can be optimised by fully exploiting Ireland's Ancient East, the heritage of the Boyne Valley area and the Cooley Mountains / Carlingford Lough.

- Louth is a significant FDI investment location in common with other locations in the region and nationally. The objective is to continue to attract FDI with an emphasis on high value employment and quality investment. However, it must be acknowledged that all skill sets must be accommodated including apprenticeships and trades in order to meet the employment needs of the young population in County Louth.
- In meeting the employment needs of the population in Louth, to encourage and support the location of international services and technology companies in town centres/urban environments to create sustainable living and working environments and reduce private transport demand.
- Utilise Drogheda and Dundalk as designated employment growth centres that will benefit the whole county and beyond.
- Active support for Indigenous companies as they grow in scale and in order to retain their presence in County Louth.
- Avail of the opportunities offered by fibre Broadband which may not have been fully realised in employment from home (full or part time).
- The need to both exploit existing employment clusters and create new clusters (e.g. energy) spatially locating employment in brown field / infill sites in the towns.
- Emphasise strongly that Louth can compete and complement, in terms of infrastructure, quality of life and spare capacity with Dublin in terms of attracting and retaining jobs.

3. Where will we live and what types of housing will be needed?

- Nationally, and in Louth the provision of homes is not aligned with housing need and housing demand. There is a shortage of private housing at certain entry points and for certain housing configurations in terms of market supply including smaller units. In addition social housing provision is deficient. However, it is acknowledged that the local authority is actively addressing social housing requirements through a number of measures including compulsory purchase and has the ability moving-forward to build social housing units subject to resources.
- It is acknowledged in terms of sustainable development that housing should be located close to employment and services in order to reduce car movements. However, it is noted that a prohibition in housing in the rural hinterland may result in rural depopulation and a skewed older demographic resulting in underutilisation of infrastructure such as schools and shops in the rural hinterland.

- Matching housing need with availability and reduced vacancy is a good dovetail as the use compulsory purchase order to acquire derelict/ vacant units in Louth demonstrates. This positive dynamic will ensure that our towns are vibrant and assist in reducing anti-social behaviour.
- All housing needs require future proofing in terms of generational requirements. Age friendly universal design is required in housing construction.
- The role of the development plan in designating sustainable development with reference to the NPF is noted and specifically, the requirement of the core strategy as a potential development inhibitor in housing construction in our towns is cited. In instances the development plan has been too prescriptive in identifying one area for housing development excluding all other built areas of the town. It is argued that housing development in our towns should be encouraged more aggressively as an alternative to building in the countryside.
- Rebuilding Ireland with a focus on housing supply may not be the solution to the housing crisis nationally and in Louth. The outcome of government policy may be that prices follow supply upward and incentivise the construction of executive type housing to the exclusion of other non-executive market housing and social housing.
- Place making will make our urban centres more attractive to encourage people to live in the town rather than in the countryside or edge of town locations. The extension of the 'Living City' initiative to Louth would be a welcome catalyst to encourage town centre living.
- It is acknowledged that higher density housing in towns is desirable. However, there is a requirement to facilitate housing choice which dictates provision of suburban housing typologies in towns, serviced sites in towns and villages and rural housing in certain circumstances.

4. What are the key services that people will need?

- Dundalk Institute of Technology (DkIT) intend to achieve university status and expand its campus to include a town centre location, which would create synergies with town centre regeneration. Drogheda may also be the location of the town centre campus. The potential of DKIT to further develop as a research centre supported nationally and by Louth County Council is acknowledged.
- DKIT has the potential to provide training and education in a number of specialist fields including the area of health care provision with a focus on aging.
- Investment in Public Transport needs to be prioritised to provide sustainable alternatives to car use.

- Lifelong and community based education, health and recreation infrastructure is required e.g. primary care centres, schools and a broad-church of sport and recreational facilities at local, county and regional level.
- Infrastructure is not solely hard physical infrastructure but comprises soft infrastructure including social, community and human capital.
- Where people live is also about choice and it has been acknowledged recently in the press that Drogheda is the preferred location for first time buyers nationally. Therefore it is essential that provision is made for all supporting facilities and services, while in tandem supporting Drogheda as a national employment centre in order that it does not become a commuter town for Dublin.

5. Where will Ireland fit in a wider (geographical) context?

- Louth's geographical location needs to be contextualised in terms of its proximity to both Dublin and Belfast along the busiest economic corridor on the Island - the Dublin /Belfast axis. It is noted that the growth corridor on the east coast may extend north beyond Belfast and south beyond Dublin and could be called the Irish Sea Corridor (Ireland's Economic East Alternative).
- There is an opportunity to prioritise the established and logical Dublin /Belfast linear economic corridor as the primary growth axis on the island of Ireland. The geographical context of proximity to Dublin and location along the Dublin / Belfast axis requires that there is a spatial plan for Dublin and its region, where in Louth in particular, its two large towns will play a significant role in the sustainable growth of the metropolitan region.
- The threat of Brexit is an opportunity to focus attention on the key role of Louth's towns as sustainable national growth centres and as part of the broader Dublin metropolitan region extending north.
- The geographical context must be cognisant of the border. The border presently is, in practical terms, an arbitrary demarcation locally evidenced in formalised cross border initiatives, co-operation and in integrated markets (e.g. labour). However, this may change as a consequence of Brexit.

6. What are the planning responses to key environmental challenges?

- Zero carbon strategy for Louth cannot be solely a branding exercise. It must have substance and this will involve difficult decisions.
- The requirement for a zero carbon branding to have substance dictates a Sustainable Energy Strategy.

- The national commitment to zero carbon by 2050 will require movement towards sustainable transportation patterns and renewable energy generation. Louth can exploit these opportunities. However it is acknowledged that sustainable energy regulations need to be reviewed and updated periodically.
- Albeit that inter regional transportation is good, there is a need for better public transport provision within Louth between its urban centres and this would counteract rural isolation.
- Prioritise walking and cycling as a quick win in terms of reducing reliance on cars.
- A focus on river, sea, air quality and natural capital that surrounds, all of which provides good soil, food and heritage.

7. What infrastructure is required – what are the national priorities?

- Flood defence will be a significant infrastructure requirement over the 20 plus year horizon of the NPF.
- There is a requirement for sport and recreational facilities that need to be optimised for everyone in the community by providing universal access. The clustering of sports facilities and multi-club/code use of the same facility will optimise the resource.
- Investment in public transport needs to be prioritised within County Louth, to provide improved linkages with the 2 major urban centres.
- Electrification of the existing rail line and potential extension of same would create a viable alternative to intra-county and inter-county car based movement.
- Investment in the Smart City concept should be fully realised in both Drogheda and Dundalk.
- Investment in additional schools as evidence based in the Fingal / Meath / Louth survey of education infrastructure requirements.
- Investment in tourism Infrastructure, (e.g., Greenways/Walkways, facilities and signage) support local businesses while representing a viable return on that investment.
- Exploit the potential of Louth's ports including Drogheda and Greenore ports through further investment in core port activities and leisure.
- Investment in social housing is reiterated in order for local authorities to deliver same.

- Significant spare capacity is available in both Water and waste water infrastructure in the County.

8. How should a National Planning Framework be implemented?

- The role of new technologies needs to be understood and evaluated.
- Central government investment programme must be linked to implementation - prioritise public transport in order to achieve sustainable development outcomes.
- Periodic review of the strategy at implementation stage and feedback loops.
- Through collaboration with stakeholders at local, regional and national level.

9. What will success look like?

- Louth is more effective together in its engagement with the NPF - speaking with one voice and having a clear development strategy message.
- The desirability of an alternative city strategy on the other side of the Island is acknowledged but is it evidenced based? There is an equally good and more logical argument to develop as a national growth strategy the established Dublin-Belfast corridor including exploiting the latent potential of the large towns of Drogheda and Dundalk individually and collectively.
- The integration of land use and transport planning (in particular rail based transport) to provide a number of sustainable growth centres within the broad Dublin metropolitan hinterland. Drogheda and Dundalk, located along the eastern economic corridor rail line, have the potential to be part of a poly-centric networked sustainable city region with two-way movement between the city core and growth centres located and connected by rail within the metropolitan region.
- Strong urban centres as a way to bring work/home and services together (reducing travel demand) as an incentive to end urban sprawl and out of town development.
- The consideration of spatial and sectoral national initiatives within an all island context. It is acknowledged that county/cross border boundaries are artificial, for example, Louth is intrinsically connected to South Armagh and South Down.

- In the context of the above, a focus on joint agreements, MOU between Louth and Newry/Mourne/Down and other cross border documents dictates a more holistic all island approach in the future.

Vision Context

The Issues and Choices paper acknowledges that Dublin is the principal national growth engine. In Leinster Dublin's influence is greatest. The areas that are most under Dublin urban influence are the counties in closest proximity including Louth. The spatial characteristic of this influence to date is edge of city development or urban sprawl. The NPF is an opportunity to re-position growth in Dublin and its broad metropolitan hinterland into a pattern of sustainable development. However, to achieve this goal a dedicated spatial plan for Dublin and its city region is required, and should be the core spatial /economic growth strategy of the NPF.

The Dublin metropolitan region population of 1.9 million is almost identical to the Copenhagen metropolitan region population of 2 million. It is noted that in recent decades Danish spatial planning has moved away from national spatial planning given an understanding of the effectiveness of national spatial planning within the dynamic of a globalised economy. However, the Danish have remained dedicated to the spatial plan for Copenhagen originating from 1947. The iconic Finger Plan has been revised and updated but is in its essence a growth strategy prioritising development along the radial rail network from Copenhagen into the metropolitan area – the city core is the palm of the hand and the fingers the linear growth corridors aligned with the rail corridors. The success of the Finger Plan is such, that a new wave of cross metropolitan connections between the fingers with the construction of orbital light rail is envisaged in the Loop Plan pioneered by 10 cities within the Copenhagen city region. It is argued that the Danish template of spatial planning acknowledging the lead role of the capital city region in economic growth in Denmark and the role of a dedicated spatial plan for the city and its metropolitan area in achieving that success is an exemplar for Ireland.

The east coast corridor Dublin / Belfast axis is the long established and acknowledged primary economic growth corridor on the island. It is logical and in the context of BREXIT an imperative to facilitate and support the continued sustainable development of the Dublin / Belfast corridor. Indeed the role of the Dublin / Belfast relationship must be understood in the appreciation of the historic and holistic urban hierarchy on the island of Ireland rather than the primacy of Dublin within the truncated urban hierarchy of the State. Dublin viewed in the context of the urban network in north-east Ireland is the southern growth node in a linear urban axis along the east coast with its northern counter balance in the Belfast metropolitan area. The duality of 2 primary urban centres on the island of Ireland was more equal and pronounced before partition. The cities of Dublin and Belfast in scale were almost identical in population at the turn of the nineteenth century. The duality of Dublin as the administrative centre and Belfast as the industrial power house in the nineteenth century has shifted but the core linear relationship of 2 metropolitan areas of scale combining their hinterlands to form the primary economic corridor on the island prevails. In this holistic analysis of the urban hierarchy on the island, Ireland is more similar to Scotland in the form of its urban hierarchy, with its complementary city

regions of Glasgow and Edinburgh, rather than the cited comparison primate cities such as London and Paris which are over-dominant in their national contexts.

The NPF has the potential to clearly define as the primary urban relationship on the island the linear east coast or Irish Sea corridor aligned with the coastal rail line and the north / south motorway to encompass the cities of Dublin and Belfast, the significant towns located between these cities including the largest towns in the State, Drogheda and Dundalk, and to extend the relationship south of Dublin into Wicklow and beyond and north of Belfast. The NPF is an opportunity to forward plan for the existing strong spatial relationships of the established Dublin / Belfast east coast corridor intersecting with a sustainable development strategy to accommodate the natural growth of the Dublin metropolitan region. It is acknowledged that there is a need to understand where actual investment and growth trends are happening. If the NPF is to be meaningful the above requires detailed interrogation and scenario building for the variables of employment and population growth within the plan period to 2040.

Drogheda and Dundalk are towns with the potential for critical mass to provide a wide range of employment and service opportunities that can appeal nationally and internationally. It is noted that the population catchment of Louth's towns is the greatest on the island of Ireland given their equidistant location between the Belfast and Dublin metropolitan areas. The population within 60 kilometre radius of Drogheda is 1.8 million. It must be remembered that albeit Drogheda and Dundalk are designated in the nomenclature of the urban hierarchy as towns - it is evident that they are equal in size to Ireland's smaller designated cities. In practical terms it may be argued when combined Drogheda and Dundalk, not only complement one and other, but have the critical mass to compete with Ireland's 2nd tier cities.

The established commuting pattern between Louth and Dublin city and suburbs is predominantly one way with limited reciprocal commuting flows between Dublin, Drogheda and Dundalk. There is an opportunity to replicate successful city regions with a high level of reciprocal flows from the city core to regional economic centres that generate attractive jobs for workers living in the core city. Vienna is an example that reflects a highly polycentric dynamic with regional urban centres having a high level of reciprocal flows with the city core. In the Dublin metropolitan context neighbouring urban centres in the hinterland located on the radial rail network, in specific Drogheda and Dundalk because of their geographic proximity and direct access to the city centre via Connolly station, have the potential to develop reciprocal commute flows counter balancing the established inward Dublin commuting pattern. The full exploitation of road and rail assets by facilitating reciprocal commuter flows optimises existing infrastructure and is an example of effective regional development.

The dynamic of reciprocal flows is happening in Louth and may continue at pace without intervention as the market and economic gravity dictate. Drogheda is an established success as a re-location for established businesses and start ups attracted from Dublin city and near suburbs by quality of life and proximity to Dublin Airport. However, for the reciprocal flow dynamic to form a meaningful part of the NPF, the spatial planning of the Dublin metropolitan region and central government investment, in particular transport investment decisions, need to first recognise the desirability of the dynamic and prioritise. In the context of the NPF, there is a latent opportunity to create sustainable growth patterns by spatially planning for greater

employment opportunities in a network of connected growth centres with the potential for critical mass located along the radial commuter rail network into Dublin.

The under 18 years of age demographic in the Dublin metropolitan hinterland will require jobs in the lifetime of the NPF and those jobs need to be spatially proximate. For example, in the 2011 census, more than a third of the population of Collon, Clogherhead and Tullyallen (in the hinterland of the potential national employment growth centre of Drogheda) in County Louth were aged less than 18 years of age. To acknowledge that this is where population has located and will continue in all likelihood to locate within a broad metropolitan region dictates a remediation strategy to make natural growth centres sustainable. In conclusion, a metropolitan spatial plan for Dublin city and its broad hinterland, comprising a network of interconnected growth centres strategically located on the radial rail network linking the city core with a high level of reciprocal movement between the city and these growth centres should be at the core of the national planning framework vision.

Conclusion

The National Planning Framework (NPF) linked to a public investment programme is an opportunity to provide a spatial / economic development framework – a long-term view to 2040 – for spatial and sectoral collaboration at local, county, regional and national level to achieve mutually beneficial and environmentally desirable growth goals. However, it must be cautioned that the potential treat of NPF policies seeking to constrain development in one region to favour an alternative region rather than seeking to harness the economic potential of all regions would potentially hinder national economic growth. There is the strongest likelihood within the context of a globalised Irish economy that Dublin, as the only city region of metropolitan scale in the State, will continue to attract talent and investment growing the city and its metropolitan region. **The success of the NPF will be evidenced in its effective guide of growth in Dublin and the metropolitan region into a pattern of sustainable development rather than the urban sprawl scenario to date.**

In conclusion, a development strategy for county Louth housed within a metropolitan regional context, exploiting its geography in proximity to Dublin and its location along the primary economic corridor on the island the Dublin / Belfast axis, will be a viable and sustainable growth framework for the county providing for the sustainable development of the towns of Drogheda and Dundalk, all smaller towns and villages and the extensive rural hinterland.

- 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 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.

- 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 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 city 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.
- The comparative advantages of Louth in terms of its geographic location, accessibility, universal fibre broad band availability, educated and experienced workforce, youth demographic and overall quality of life 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.



Joan Martin
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Louth County Council

31st March 2017

