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28<sup>th</sup> June 2021

Our Ref. 21016

**Re: Draft Meath County Development Plan 2021-2027 – Material Amendments**

**Formal submission**

Dear Fred,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by you on behalf of our client Protect East Meath Limited (PEML) to make a submission in relation to the publication of the Proposed Material Amendments to the Draft Meath County Development Plan 2021-2027 (Draft Plan); and how they relate to the approach to the zoning within the Southern Environs of Drogheda.

The basis of the submission is whether the approach to zoning employed by Meath County Council under the Material Amendments of the Draft Plan is consistent with the objectives of the Regional Spatial and Economic Strategy 2019 - 2031 (RSES) for the Eastern and Midland Regional Assembly. This submission also assesses whether the approach to zoning employed under the Material Amendments is consistent with the population targets for Drogheda under RSES; as well as being consistent with best practice in terms of the proper planning and sustainable development of the area.

Our assessment has concluded that the Material Amendments should be revised as follows, and for the following reasons:

- The Material Amendments indicate a significant overzoning of A2 New Residential zoned land of over 100ha. within the Southern Environs of Drogheda even when based on the inflated housing allocation figures under Table 2.11;
- The household allocation under Table 2.11 of the Material Amendments is excessive based on RSES
- The capacity of the A2 New Residential zoned land has the potential to generate a population increase of between 13,738 and 17,663 within the southern environs of Drogheda up to 2027 increasing the population of Drogheda, irrespective of new residential zoned land in Co. Louth, to a population significantly over the RSES population target for Drogheda of 50,000 in 2031;
- Incorrect occupancy levels of 2.1 are used for the Southern environs of Drogheda that artificially increases the required household allocation for the Plan period;
- The level of zoning and population targets for the Southern environs of Drogheda are inconsistent and contrary to the population targets and approach to zoning for Drogheda outlined under the RSES;
- The overzoning of land now under the Material Amendments will undermine the need as a priority to prepare a Joint Vision and Urban Area Plan (UAP) for Drogheda as is required under Regional Policy Objective 4.8 of the RSES, and implement a more balanced and compact growth strategy for Drogheda that reflects the existing distribution of population;
- It is recommended that existing Phase 1 zoned lands are kept pending the adoption of the Joint Urban Area Plan for Drogheda as there remains significant capacity to facilitate housing development and population increases in line with RSES, prior to the adoption as a priority of the Joint UAP; and
- Level of overzoning will result in unplanned; unsustainable and haphazard development of the southern environs of Drogheda

Prior to assessing these in detail, it is important to set out the planning and development facts relating to the planning and sustainable development of Drogheda.

## Facts

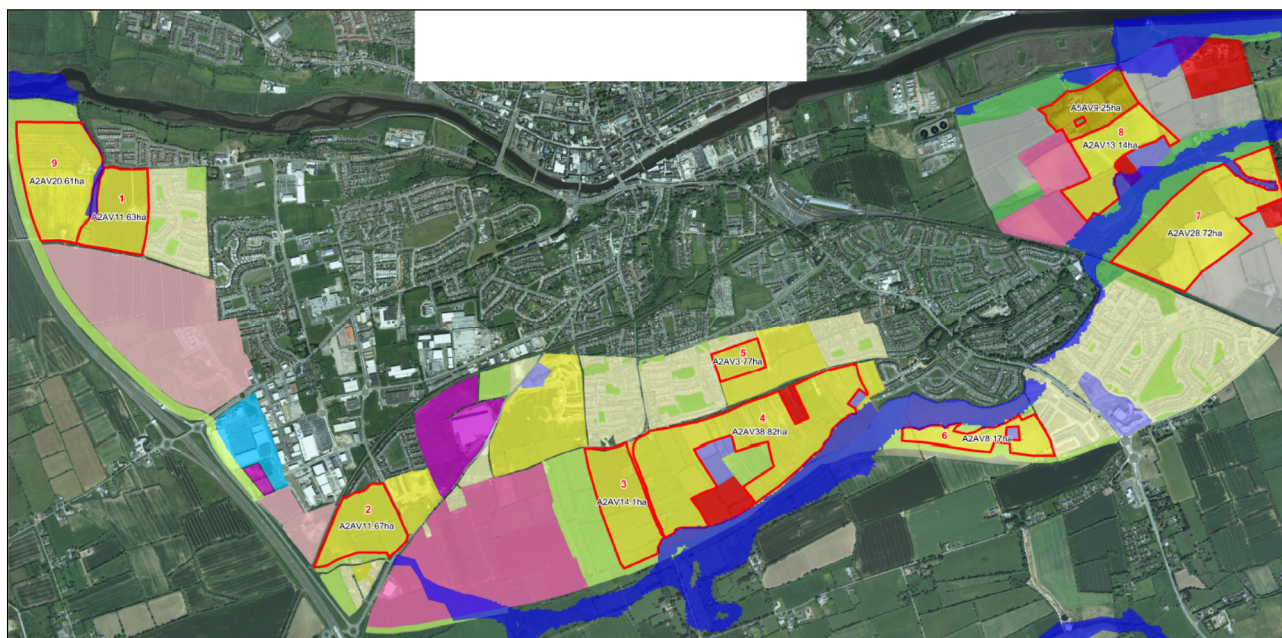
Drogheda had a population of 40,956 at the time of the last Census of Population in 2016. The vast majority of this population is located within Co. Louth (c. 84.1%) with only 6,527 (15.9%) residing within the area known as the Southern Environs of Drogheda within County Meath. We note that the household size within Drogheda (as a settlement) including both the Co. Meath and Co. Louth parts amounted to 2.76 persons per household at the time of the 2016 Census. This is slightly below the average household size within the county as set out under the Census.

## Meath County Development Plan 2013 - 2019

Prior to outlining the land use basis for RSES in terms of its population targets and objectives, it is essential to review the previous County Development Plan as it applied to the southern environs of Drogheda. Under Variation no. 2 of the County Development Plan, which was adopted by the members of the Council on the 19<sup>th</sup> May 2014, the Planning Authority introduced an order of priority (i.e. Phase I and Phase II as described below) for the phased development of residentially zoned lands in the largest settlements (Ashbourne, Southern Environs of Drogheda, Dunboyne/Clonee/Pace, Dunshaughlin and Ratoath) to align the land use zoning objectives with the core strategy and to deal with significant overzoning in Meath.

This Plan under this variation indicated a household allocation of 857 household units to be achieved over the Plan period in the Southern Environs of Drogheda. The Plan indicated that this included a 50% headroom meaning that only 571 new houses are required in reality. This appears to be an indication that 50% has been added to the household allocation target during the Plan period. This, in our considered opinion, is a slightly simplistic interpretation of what headroom amounts to. The RSES that came in and was adopted subsequent to the 2013 Plan states that practice has generally been to match future population targets to the physical extent of land zoned for development, based on assumptions related to density and household occupancy; with a further factor of 50% of additional land above that required being applied as the headroom.

The 2013 Plan states within Table 5 that there is 157.2ha. of residentially zoned land within the southern environs of Drogheda. A further 1.8ha. was available for residential development within mixed use zones. The Table assumed an average net residential density of 43 units per hectare requiring 19.9ha. of residentially zoned land. Table 5.1 indicated a surplus / excess of 139.1ha. of residentially zoned land. These land parcels were quantified under the 2013 Plan with other new residentially zoned land and removed from this equation as they had at the time of making of the Plan extant permissions relating to them.



Land use zoning map 2013-2019

Variation no. 2 of the Plan indicated that there were extant permissions for 1,132 no. housing units within the Southern Environs of Drogheda in 2014. The Variation states that there is a legal requirement for the extent of zoning to be consistent with the core strategy of the Meath County Development Plan. In order to do so the Planning Authority undertook, as referenced under section 1.0 – Household Allocation of Volume 5 of the County Development Plan that related to Additional Policies and Objectives for Local Area Plans – Drogheda

Southern Environs LAP an evidence based approach to evaluate the nine identified residentially zoned sites as detailed in Table 6 of the Variation (copied below).

	Location	Land Area (hectares)
<b>Site 1</b>	Lands south of the Rathmullan Road	11.88
<b>Site 2</b>	Lands on the Platin Road	11.67
<b>Site 3</b>	Lands at Bryanstown, west of the Beamore Road	14.1
<b>Site 4</b>	Lands at Bryanstown, east of the Beamore Road (excluding lands subject to flood risk)	38.82
<b>Site 5</b>	Lands south of Bryanstown Cross Route	3.77
<b>Site 6</b>	Lands west of Colpe Cross (excluding lands identified as being subject to flood risk)	8.17
<b>Site 7</b>	Lands west of Mill Road (excluding lands identified as being subject to flood risk)	28.72
<b>Site 8</b>	Lands south of Marsh Road	22.42
<b>Site 9</b>	Lands at western end of Rathmullan Road	20.61

Table 6 from the Meath County Development Plan 2013-2019 as varied – Residential sites for Evaluation in the Southern Environs of Drogheda

The release of residentially zoned land was evaluated and ranked in order of priority having regard to a number of planning and environmental factors as follows:

- Proximity to town centre;
- Environmental constraints;
- Availability of public transport;
- Availability of community and social infrastructure facilities with particular regard to educational facilities;
- The need to provide new road infrastructure to facilitate development; and
- Consistency with sequential approach to urban expansion and contribution to a compact urban form.

The Variation evaluated the nine sites identified in Table 6 and provided a weighting to each based on how it achieved the above set of criteria. This led to Table 8 of Variation no. 2 that broke the nine sites into what were defined as Phase I and Phase II. Phase I zoned land were to be prioritised for release during the lifetime of the 2013-2019 Plan. The timeline for the release of Phase II zoned land is stated to be considered post-2019, i.e. not during the lifetime of the current plan. The Variation emphasised that there could be no expectation or commitment that the Residential zoning of Phase II lands would be maintained in any future plan<sup>1</sup>. It was noted that only part of three parcels of land (Sites 1, 2 and 9) were to be released under Phase I with an overall capacity of the sites based on densities taking into account their location and Government policies of 856 units (although the consolidated version of the CDP refers to 857 – see table 2.5) across 19.9ha. based on an average density of 43 units per hectare. As already noted there was at the time of Variation no. 2 a total of 1,174 committed unbuilt housing units (as identified in Table 2.5 of Written Statement of County Development Plan incorporating Variation no. 2) within the Drogheda Environs in December 2014 and an excess of 139.1ha. of residential zoned land.

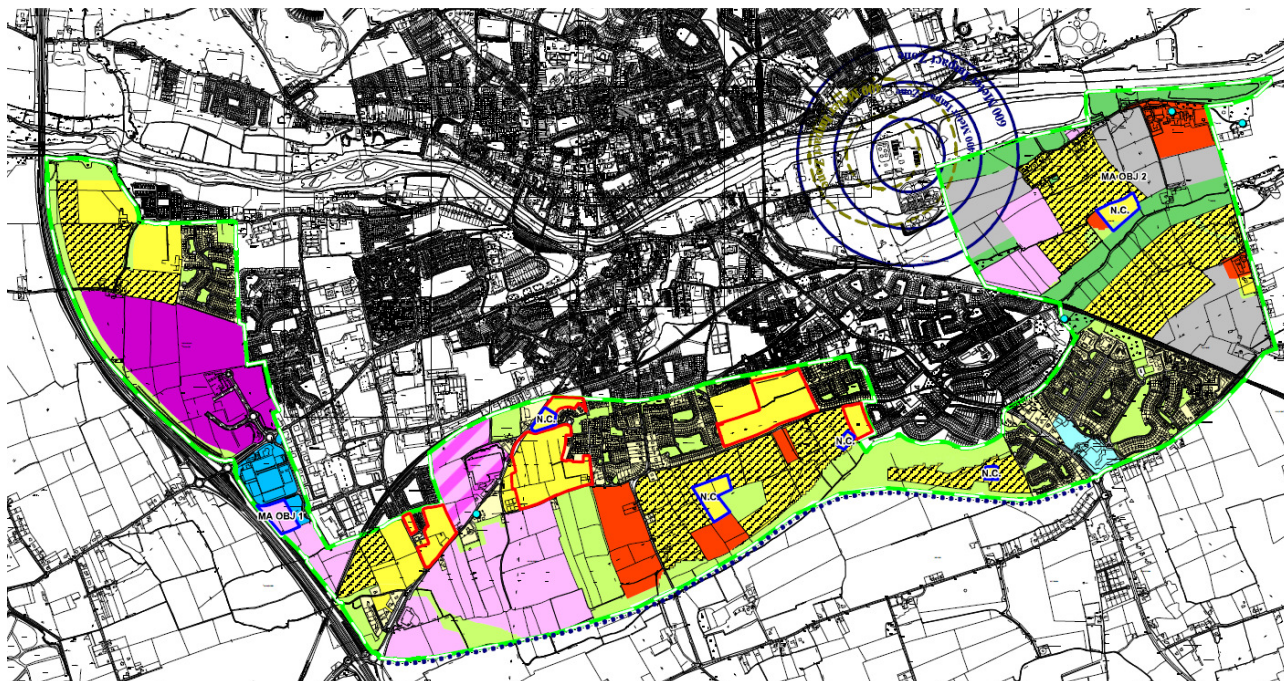
Site	Zoning	Land Area (ha)	Density	Yield	Rank	Phase
<b>Site 5</b>	A2	3.77	40	151	1st	I
<b>Site 1</b>	A2	11.88	35	416	Joint 2nd	I* (6.7ha/235 units)
<b>Site 2</b>	A2	11.67	35	408	Joint 2nd	I* (6.7ha/235 units)
<b>Site 9</b>	A2	20.61	35	721	Joint 2nd	I* (6.7ha/235 units)
<b>Site 3</b>	A2	14.1	43	606	5th	II
<b>Site 6</b>	A2	8.17	35	286	Joint 6th	II
<b>Site 7</b>	A2	28.72	43	1,235	Joint 6th	II
<b>Site 8</b>	A2	22.42	43	964	Joint 6th	II
<b>Site 4</b>	A2	38.82	43	1,669	9th	II

Table 8 from the Meath County Development Plan 2013-2019 as varied – Residential Land Phasing

<sup>1</sup> Section 3.3 of Introduction to Variation No 2



The updated Plan following the adoption of Variation no. 2 in May 2014 effectively implemented the household allocation requirements of the Core Strategy of the County Development Plan by establishing an order of Priority Phasing Arrangement for residentially zoned lands.



Extract from Meath County Development Plan 2013-2019 showing location of Phase I (bright yellow) and Phase II (hatched yellow) lands

### **National Planning Framework**

The National Planning Framework provides the strategic national land use framework for regional and county plans. Within it, Drogheda is recognised under National Policy Objective 2b as part of the Drogheda – Dundalk – Newry cross border network that will be supported and complied with under the Regional Spatial and Economic Strategy 2019 - 2031 (RSES) for the Eastern and Midland Regional Assembly.

The need for an integrated and co-ordinated approach to land use planning in Drogheda is emphasised on page 24 of the National Planning Framework. This states:

*“It will be necessary to prepare co-ordinated strategies for Dundalk and Drogheda at both regional and town level to ensure that they have the capacity **to grow sustainably** and secure investment as key centres on the Drogheda-Dundalk-Newry cross-border network.”* (own emphasis)

In this regard the NPF (page 35) also recognises that a key future planning and development; as well as place making policy priority for the Region is:

*“A focused approach to **compact, sequential and sustainable development of the larger urban areas** along the Dublin – Belfast economic and transport corridor, along which there are settlements with significant populations **such as** Dundalk and **Drogheda**.”* (own emphasis)

National Policy Objective 7 (page 61) requires a “tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on .... Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor”

Page 62 of the NPF confirms the key regional role of Drogheda as embodied in National Policy Objective 2b and 7 and indicates that “The extent to which these towns should target future growth will be determined at regional level in the context of this Framework.”

Appendix 3 of the NPF identifies a methodology for a two tier approach to land use zoning where tier 1 relates to serviced zoned land; and where tier 2 relates to serviceable zoned land. The Appendix states that Tier 1 lands should normally require to be located within the footprint of or spatially sequential within the settlement. This does not have implications in terms of quantum of zoned land that should be zoned but merely a need to distinguish between zoned land that is serviced; and zoned land that is not, but has capacity to be.

### ***Regional Spatial and Economic Strategy 2019 - 2031 (RSES) for the Eastern and Midland Regional Assembly***

The Regional Spatial and Economic Strategy 2019 - 2031 (RSES) for the Eastern and Midland Regional Assembly was adopted on the 28<sup>th</sup> June 2019 in accordance with section 24 (9) of the Planning and Development Act 2000 (as amended).

Within the RSES there is no separation between the different administrative areas that govern Drogheda (Louth County Council and Meath County Council). Objectives for the town were based on its settlement form, and its capacity for growth in a compact manner as a Regional Growth Centre. This is set out under the Regional Strategic Objective 1 (RSO1) of RSES that states:

*“Better manage the sustainable and compact growth of Dublin as a city of international scale and develop Athlone, Dundalk, Drogheda and a number of key complementary growth settlements of sufficient scale to be drivers of regional growth. (NSO 1, 7, 10)”*

The RSES states that the RSO's are aligned with international, EU and national policy, and which in turn set the framework for the city and county development plans. The growth strategy under RSES is to target growth within regional growth centres such as Drogheda as regional drivers that will grow to city scale. The Growth Strategy (page 40) recognises that in order to facilitate this growth and to facilitate *‘more effective strategic planning and co-ordination of the future development of nationally and regionally strategic locations that straddle inter- or intra-regional boundaries’* such as Drogheda; will require joint urban area plans to be delivered.

Table 4.2 of the RSES identifies Drogheda as a Regional Growth Centre. These are defined as large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wider catchment area. Figure 4.2 of the RSES outlines that **the vision for Drogheda is to reach a target population of 50,000 by 2031.**

Section 4.3 of the RSES deals with “Defining a Settlement Typology” and Regional Policy Objective 4.1 states:

*“In preparing core strategies for development plans, local authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.”*

The RSES also addresses zoning of land having regard to planning permissions and it states that core strategies may apply prioritisation measures and / or dezoning of land where a surplus of land is identified in plans with regard to the National Planning Framework (page 46). It also states that regard should be had to the consideration of sequential zoning of lands which are suitable for delivery of housing but may be not forthcoming in the plan period having regard to the 2031 roadmap targets, subject to the proper planning and sustainable development of the area.

For example, the consideration of **development land prioritisation measures** by local authorities rather than ‘dezoning’ of land, where there may be a surplus, would be more appropriate unless there was an ill-considered spatial distribution of over-zoning. This is clearly the approach that was taken under Variation 2 of the Meath County Development Plan 2013-2019. However, unlike Variation No 2, the Southern Environs of Drogheda is the only settlement in the current draft plan where neither phasing nor dezoning has been applied to ensure alignment between the land use zoning objectives and the core strategy.

Core strategies should apply prioritisation measures and / or de-zoning of land where a surplus of land is identified in plans with regard to the NPF Implementation Roadmap up to 2031. In preparing core strategies by Council's, account should also be given to the consideration of sequential lands which are suitable for the delivery of housing but may not be forthcoming in the plan period having regard to 2031 roadmap targets, subject to proper planning and sustainable development considerations.

It identifies the need for planning authorities to monitor the completion of development on strategic zoned land; as well as the delivery of housing having regard to implement strategic needs and avoid hoarding of land and/or planning permissions. It also recommends an avoidance of reserving lands for future development at priority locations as it creates an unreasonable dependency on the zoned sites being brought forward.

The RSES also identifies the need for headroom in regard to zoned land. It states that the NPF already incorporates a 25% headroom figure for all parts of the country; and that this can be supplemented by a further 25% headroom in areas, such as Drogheda. Put simply, and as an example, this means that if population targets require 100 hectares then 150 hectares should be zoned. It should not be based on an imaginary population target that is increased by 50%, as this provides a basis for unplanned development and a failure to achieve the compact growth for the southern environs of Drogheda.

Pages 62-65 of RSES outlines some Regional Policy Objectives for Drogheda. It identifies the need for the preparation and adoption of a statutory Joint Urban Area Plan by Louth and Meath County Councils to be a priority for the planned growth of the entire settlement of Drogheda. We note that a Material Amendment under the Draft Plan requires the insertion of the "as a priority" into STH DRO OBJ 1. The aim of the joint UAP is to facilitate a reasonable proportioning of residential zoning within the settlement relative to the existing population levels in each local authority area (page 64 of RSES).

#### ***Draft Louth County Development Plan 2021-2027***

In terms of the overall Regional Growth of Drogheda as outlined under RSES, and given the need for a joint UAP as a priority, it was important to also consider the Draft Louth County Development Plan as part of this submission. The Draft Plan has been subject to its public consultation stage and a Chief Executive Report made on those submissions has been published. The Material Amendments of the Draft Plan are to be published imminently.

The Draft identified that the population of Drogheda (within Louth) at the time of the 2016 Census was 34,199, and that the projected population for 2027 is 41,113; a projected population increase of 6,914. In 2016 approximately 84% of the population of Drogheda lived in Louth.

The Draft Plan estimates an additional housing stock need, within the Louth part of Drogheda, of 3,443 between 2016 and 2027. It states that 400 units have been completed between 2016 and 2020 and therefore there is an overall housing need of 3,043 from the Plan period to 2027 (we note a figure of only 2,606 appears in table 2.16 of the draft Plan). The Plan identifies 34.8ha. of infill or brownfields land with capacity to deliver 1,725 housing units. It also identifies 213ha. of land zoned for new residential development. The majority of this land is to the north of the town in an arc north of the town centre and is indicated as a counter-balance to the level of zoning within the southern environs of Drogheda.

#### ***Draft Meath County Development Plan 2020-2026***

The Draft Meath County Development Plan 2020-2026 was put on public display on the 18<sup>th</sup> December 2019. Its publication was delayed to allow the adoption of the RSES, so that its policies and objectives could be incorporated within the Draft Plan. The Plan as it relates to Drogheda proposed removing the phasing approach adopted under Variation No 2 to the previous Plan. There is a lack of a justification for this given the evidence approach to the phasing of zoning adopted under Variation no. 2 of the 2013 Plan. It appears to be based solely on the need to provide flexibility but primarily based around an argument that some Phase I zoned lands did not come forward to be developed during the last Plan period. It is unclear how the Planning Authority has sought to ensure consistency with the Core Strategy in relation to the Southern Environs of Drogheda.

The Draft Plan identified that the 2016 Census indicated an average household size of 2.96 within the County. As already outlined the average household size within the settlement of Drogheda is 2.76. The Draft Plan indicates that the county level household size would reduce to 2.5 within the period to 2026.



The Draft Plan indicates that the Drogheda southern environs had a population of 6,527 at the time of the 2016 Census. It also indicated that there was an extant permission for 572 units within the southern environs area. It also indicates that approximately 113 housing units were delivered between 2016 (last Census) and 2019 (at which time the Draft Plan was being prepared).

The Draft Plan indicates a projected population increase of 3,300 to 2026 with a total household allocation of 1,631. Table 2.11 indicates 178.73ha. of land as being zoned for residential use. It is a requirement of the Plan to develop residentially zoned land at densities of between 35 and 45 units/ha. This is dependent on location and proximity to services and connections with a presumption that densities of 45 units / ha. will occur on more centrally located and strategic lands; and densities of 35 units / ha. on the remaining edge of centre lands (page 81 of the Draft Plan).

This quantum of residential zoned land as identified in Table 2.11 has capacity to develop between 6,256 units if lands were developed at 35 units per ha. and 8,043 units if lands were developed at 45 units per hectare. The Plan states that the population projections are based on a headroom of 50% for population projections.

Section 2.8.1 of the Draft Plan sets out that RSES provides options for addressing the overzoning of lands for residential purposes. These amount to providing prioritisation measures that take account of the sequential development of lands and/or the ability to dezone lands.

This section of the Plan also recognises that there are instances where long term development potential lands are not being brought forward for development. Rather than being dependent on these lands for residential development, the RSES indicates that Local Authorities should consider other suitable lands with better prospects for delivery in the short term whilst also pursuing the more strategic lands through an Active Land Management Strategy. The Draft Plan states within this section that a prioritisation / phasing of residentially zoned lands will be undertaken in Regional Growth Centres, key towns or self-sustaining towns. It is notable that Drogheda as the only Regional Growth Centre within Co. Meath was not identified for the prioritisation / phasing of residentially zoned land. This has led to a significant overzoning of residentially zoned land.

Section 2.8.1.1 of the Draft Plan refers to the preparation of a Joint Urban Area Plan for Drogheda. As already stated this is required under RPO 4.1 of the RSES. This section of the Plan states:

*"In recognition of the requirement for a co-ordinated strategy to maximise the growth potential of Drogheda, which is designated as a Regional Growth Centre in the NPF, Regional Policy Objective (RPO) 4.11 in the RSES sets out the requirement for the preparation of a Joint Urban Area Plan for the town between Meath and Louth County Council.*

*Whilst there have been a number of meetings between Senior Officials from Meath and Louth County Councils, at the time of writing the timeframe for the preparation of this Joint Urban Area Plan had not been agreed. It is acknowledged that any amendments to the land use zoning strategy for the Southern Environs of Drogheda would be premature pending the preparation of this Joint Plan. However the Council also recognises that Drogheda is one of the principle areas for population and economic growth in the Eastern and Midland Region outside Dublin.*

*Taking this into account it is important that land use availability is reflective of its position in the settlement hierarchy and its anticipated role in the future growth and development of the Region, which is to act as a regional driver of economic growth. The 'Residential Phase II' designation on the A2 'New Residential' lands in the Southern Environs of Drogheda has therefore been removed with these A2 'New Residential' land retained and being made available for development.*

*This 'transitional arrangement' will ensure there is sufficient land available to facilitate population growth and economic development based on its designation as a Regional Growth Centre. As part of the Joint Urban Area Plan process a more detailed examination of the quantum of residential and employment zoned lands, in addition to open space and community infrastructure, will be carried out. Pending the completion of this process the Council will closely monitor development activity in the area." (own emphasis)*

The Core Strategy Objective 7 provides a guidelines as to how the Council will deal with the prioritisation of the release of land. It states:

*“To operate an Order of Priority for the release and development of residential lands with any lands identified as being ‘Post 2026’ not available for development until after 2026 in settlements where ‘Post 2026’ lands have been identified.”*

It is notable that such lands are only provided for within Dunboyne, Navan, Dunshaughlin and Kilcock Environs. There is no explanation as to the rationale for excluding the Southern Environs of Drogheda from such phasing / prioritisation of zoned land or a discussion as to how this approach ensures consistency with the Core Strategy. In this regard we note that Dunboyne is indicated as having a similar population increase and a similar overzoning to the southern environs of Drogheda. Similar overzoning also applies to Navan and Dunshaughlin.

Settlement	Population 2016	Projected population increase to 2026	Projected population 2026	Approximate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2026 <sup>37</sup>	Potential units to be delivered on infill/brown-field lands <sup>38</sup>	Quantum of land zoned for residential use (ha)
Regional Growth Centre								
Drogheda	6,527	3,300	9,827	113	572	1,631		178.73

*Extract Table 2.11 of the Draft Meath County Development Plan 2020 – 2026 published in December 2020*

Settlement	Population 2016	Projected population increase to 2027	Projected population 2027	Approximate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2027 <sup>37</sup>	Potential units to be delivered on infill/brown-field lands <sup>38</sup>	Quantum of land zoned for residential use (ha)	Quantum of land zoned for existing residential use (ha)	Quantum of land zoned for mix of uses (ha)
Regional Growth Centre										
Drogheda	6,527	3,300	9,827	113	572	1,631	0	178.73	118.59	5.00

*Extract from Table 2.11 of the Draft Meath County Development Plan 2020 – 2026 as proposed in Material Amendment published 31 May 2021*

## MATERIAL AMENDMENTS

We have as part of this submission reviewed the Material Amendments put out on display by Meath County Council on the 31<sup>st</sup> May 2021. It is noted that Table 2.11 has been proposed for amendedment, the approach to land use planning and specifically residential zoning within the southern environs of Meath are an important starting point for the purposes of this submission on the amended settlement strategy.

We note that Table 2.11 of the Core Strategy has been amended under the Material Amendments to include two columns that relate to the Quantum of land zoned for existing residential use (118.59ha.) and the quantum of land zoned for mix of uses (5 ha.). We note that the household completion between 2016 and 2019 in Drogheda is indicated under Table 2.11 of the Material Amendments as being only 113 units.

In justifying the household allocation of 1,631 within Drogheda for 2020-2027 the Material Amendments in note 37 under Table 2.11 states:

*“This figure does not include the units completed 2016-2019. The calculation of the household allocation has factored in the ‘pent up’ demand for housing which has resulted in an increase in the average household occupancy rate for existing households. As the housing market continues to normalise and supply begins to meet demand it is anticipated that the average household occupancy rate for both existing and new households will begin to decrease.”*

There is no justification for how this calculation of the household allocation has been factored in. We note that the average household size within the southern environs of Drogheda at the time of the last Census was 2.85; and that the Draft County Development Plan is based on a county wide reduction in household size from 2.96 to 2.5 within the Plan period. A similar percentage decrease in Drogheda would create an average household size of c. 2.4 in Drogheda.

We also note Proposed Amendment to Chapter 2.4 that seeks to remove the word ‘transitional arrangement’ from the last paragraph of section 2.8.1.1 relating to the Joint Urban Area Plan for Drogheda. Under this



submission we set out that the following should be applied and amended under the Material Amendments of the Meath County Development Plan to avoid inconsistency with the Core strategy and to ensure that the proposed plan is consistent as far as practicable with the National Planning Framework and the RSES as is required by planning legislation.

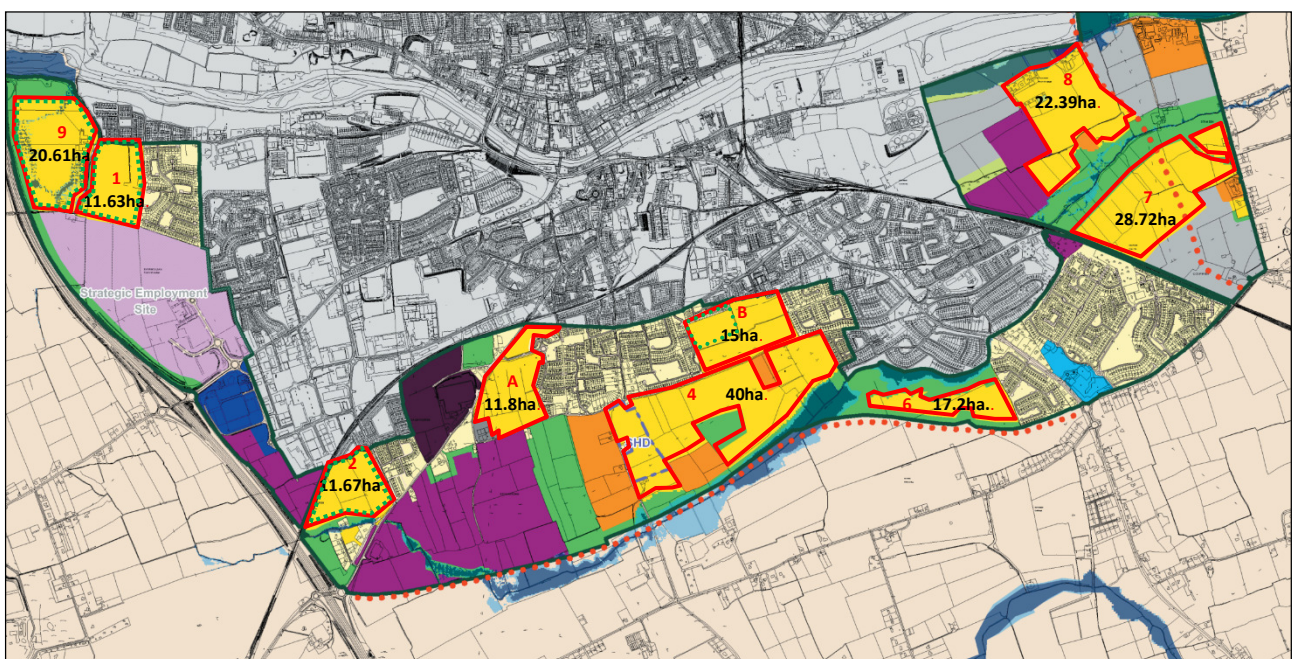
- Reinstatement of a phased approach to the zoning of land within the Southern Environs of Drogheda, with Phase 1 and Phase 2 lands to be identified under the amended table 2.11 of the Material Amendments as well as on the material amendments zoning map.
- Significant reduction in the level of available residentially zoned land to ensure consistency with the RSES and a more planned and compact growth to the Southern Environs of Drogheda;
- Transitional arrangement should not be removed from section 2.8.1.1 of the Plan; and
- Lands to the east of the railway line should not be subject to a Master Plan, but should be identified as Phase II Residential zoned lands not to be developed and to be reviewed under the UAP and/or in 2027.

The reasoning and rationale for these considerations are as follows:

### **There is significant overzoning of residential land within the Material Amendments of the Draft Meath County Development Plan 2021-2027**

The appropriate level of zoning for the Southern Environs of Drogheda must be considered in regard to the population target for the town under RSES to 2031 and the need for the 50% headroom specified within it. Table 2.11 of the Material Amendments of the Draft Plan, which are to 2027 only, indicate a projected population increase within the Drogheda Southern Environs of 3,300 (c. 50% increase from its current population). The table states that there are 572 extant units not yet built, and that there is a further need for an additional 1,631 units between 2020 and 2027. Given the latent time-lapse between achieving planning permission and building, it is assumed that the 572 is not a subset of the 1,631. This is upheld by notation 37 under Table 2.11.

It is unquestionable that there is a lack of clarity as to how the current draft Plan and its Amendments have reached their assumptions and population projection targets. However, with some changes that are readily identifiable and quantifiable, it is possible to identify the quantum of residentially zoned lands that is referred to as “Quantum land zoned for residential use (ha.)” as amounting to **all** land zoned as A2 for New Residential Development under the Land Use Zoning Map. Our measurement of this amount to 179.02 ha. as opposed to the 178.73ha. set out under Table 2.11 of the Material Amendments. We therefore will base our calculations on 179ha. as a matter of clarity.



**Map 1 - Areas of A2 – New residential zoning within the Southern Environs of Drogheda with previous Phase 1 lands outlined in green**

It is therefore clear that this residential zoned land includes site which have committed permissions as well as those which don't. As a matter of clarity we have labelled the zoned land in accordance with the Sites identified under the adopted 2013 Development Plan. Site 3 is omitted as the zoning has changed and Site 5 has been consumed within the site we have defined as Area B (see map on previous page that is located to the east of Hazel Lane and south of Blackbush Avenue). We also note that Site 8 has been extended and amended. It is notable that both Areas A and B are the most desirable to be built upon in terms of developing a compact town as is envisaged under RSES.

As outlined above the 179ha. does not include the committed development within these lands, that are as follows:

Location	Planning reference	Description	Extant units
Site 1	LB170675 and as amended under LB191536	Permission granted in 2018 for 168 units – work commenced and c. 90 units completed on a site of 7.8ha.	78
Site 2	LB180611	Permission granted in 2018 for 98 units of which 98 units are commenced and soon to be completed on a site of 5 ha.	0
Site 4	ABP Ref. TA17.303799	Permission granted for 250 units on a site of 6.6ha. (see SHD reference in above map) of which c. 47 units are commenced and completed that is located within a small part of Site 4 that measures 38.82ha	203
Site 9	ABP-305552-19	SHD application – permission granted for 661 units to be implemented over 10 years (quashed following Judicial Review partly due to development being located on Phase II lands)	0
Site A	SA60309 / LB180042	Permission for 175 units overall of which c. 149 units are either commenced or completed on a site of which only 2.6ha. is located within Site A	26

We note that the Material Amendments indicate that only 113 housing units were completed in the period between 2016 and 2019. Based on our desktop analysis it is clear that there are extant permissions for 307 units remaining within the Southern Environs and that a further 384 units are commenced, completed or nearing completion. The figures closely match that of the combined figures provided by the Council for household completions and permissions for extant units since 2016 – a figure of 685 units when combined. We are of the considered opinion that this figure is robust. There is however, a need to remove these sites from the total of land zoned and available for new residential development. This reduces the true quantum of new residential zoned land to 157ha. when committed and extant permissions are taken into account.

Due to differing times at which assessments of completions and degrees of completion are taken, then discrepancies in totals are inevitable. However, what is clear is that there is a commitment from already commenced development that the extant permissions referred to within Table 2.11 of the Material Amendments will be completed within the Plan period, unlike under the previous Plan period.

For the purpose of this assessment we are assuming that the 1,631 housing allocation for the Southern environs of Drogheda is correct and robust. We will address the reasons why it is not based on RSES and occupancy rates later in this submission. In order to assess the capacity of the lands zoned for residential development we have assumed two scenarios – one where all housing is developed at a density of 35 units per hectare, and another where housing is at a density of 45 units per hectare, as opposed to undertaking a site by site assumption. These are the recommended residential density standards for future developments outlined in the written statement for the southern environs of Drogheda.

	Land requirement based on density of 35 units per hectare	Land requirement based on density of 45 units per hectare
Land requirement to facilitate 1,631 housing units	46.6ha.	36.2ha.
Housing yield of 157ha.	5,495	7,065
Population capacity of lands at 2.5 household size	13,738	17,663

These population capacities are significantly above the total population target projections for Drogheda as a whole to 2031, ignoring the majority of the town and the fact that the draft plan only covers the period to 2027. This need for zoned land to develop 1,631 housing units has to be considered in light of this area making up only 15.9% of the total population of Drogheda in 2016 (which RSES specifically refers to as needing to be reflective of the future growth, and therefore residential zoning within both local authority areas). The only reasonable conclusion is that the capacity of the 157ha. zoned land of between 5,495 and 7,065 housing units is wholly inconsistent with the NPF and the RSES and completely unjustifiable in terms of the proper planning and sustainable development of the town in terms of engendering compact growth within Drogheda. It is also clear that the uncoordinated release of zoned land will undermine the proposed UAP by allowing for planning permission to be granted outside of the proposed framework rendering it less effective.

The Material Amendments of the Draft Plan is clear in stating that the housing figures already allow for the 50% headroom recommended under RSES. When the level of residential zoned land is considered in relation to the above it is clear that there is between a 237-333% level of residential overzoning under the Material Amendments of the Draft Plan. In other-words to use the headroom analogy it accounts for a headroom of between c. 400% and 550%. We respectfully submitted that it is unquestionable that based on the revised Table 2.11 of the Material Amendments there is a significant overzoning of residentially zoned land within the Southern Environs of Drogheda.

### **What are the implications of overzoning?**

The implications of, and the need to avoid overzoning are clearly set out under RSES. A Guiding Principle for Core Strategies under RSES is to carefully consider the phasing of development lands to ensure that towns grow in a compact manner, and in the case of Drogheda reflective of the existing balance of population, and at a sustainable level appropriate to their position within the hierarchy. The avoidance of a phased approach to zoning; and where the level of zoning is so significantly above that of what is required will result in unplanned; unsustainable and haphazard development of the southern environs of Drogheda. This would return the planning system to the badly planned expansion of towns and cities in the past, that the hierarchical Plan led system set out under the National Planning Framework and then the RSES seeks to avoid.

In our considered opinion, the zoning objectives for the Southern Environs of Drogheda must still be consistent with the core strategy even in the transitional period between the adoption of the plan and the Urban Area Plan which is required under the RSES. As our analysis has shown, the entirety of the southern environs of Drogheda cannot be considered as being of strategic and at a priority location given the fundamental mismatch between the quantum of zoned land proposed to be made available and the projected population increase over the lifetime of the next development plan.

### **Is there any justification for the removal of the Phase 2 residential zoning?**

The only rationale and justification for the removal of the Phased approach to zoning of the southern environs of Drogheda, that remains missing from Table 2.11 is set out under section 2.8.1.1 of the Plan that is sought to be amended under the Material Amendments by way of the removal of the wording 'transitional arrangement'. The Draft Plan states on one hand the intention is that any amendments to the land use zoning strategy for the Southern Environs of Drogheda would be premature, pending the preparation of the Joint Plan for the town. We respectfully submit that any such Joint Plan would address any such issues; and its purpose as outlined under RSES is to facilitate a more balanced and compact growth to the town. There is no basis for any conclusion that any amendments to the zoning strategy for the Southern Environs of Drogheda would be premature. Indeed a statement under section 2.8.1.1 could be inserted to clarify that the Phase I and Phase II zoning qualification will be maintained and that the zoning strategy would be updated under the Joint Plan. As we demonstrate below, there is more than sufficient undeveloped Phase I land available to ensure development in the short to medium term in the Southern Environs of Drogheda, even based on the over inflated housing allocations under the Material Amendments.

In our considered opinion the Council's justification is solely based on the fact that Drogheda is a key population and economic driver of the region outside of Dublin. However, this is already fully taken into consideration within RSES that outlines a target to increase the population of the town from 40,956 in 2016 to in the region of 50,000 by 2031 and which requires the adoption of a UAP as a priority. There is nothing in the RSES to support the Council's proposal to completely abandon a phased approach to the release of residential land pending the adoption of the UAP, in fact the opposite is the case. The Draft Plan states:



*“Taking this into account it is important that land use availability is reflective of its position in the settlement hierarchy and its anticipated role in the future growth and development of the Region, which is to act as a regional driver of economic growth. The ‘Residential Phase II’ designation on the A2 ‘New Residential’ lands in the Southern Environs of Drogheda has therefore been removed with these A2 ‘New Residential’ land retained and being made available for development.”*

There is also a proposal under the Material Amendments is also to remove this solely as a transitional arrangement. In other-words to facilitate the removal of the Phase 2 zoning of lands as a permanent arrangement.

The removal of the phased approach will significantly undermine the identified need, as a matter of priority, to develop the Joint Urban Area Plan for Drogheda. Given the allocation under the Material Amendments that the Joint Plan needs to be implemented within the Plan period (six years) there is a real risk that by removing the well-considered Phased approach to zoning that permissions will be granted that both undermine and are contrary to RSES. They would also undermine the purpose of the Joint Plan, which is to ensure a co-ordinated approach to the future growth and development of the town. RSES states that this growth should be compact and that the general distribution of population should generally be in proportion to existing population levels within each local authority. Even allowing for a greater increase in that proportion up to 25% it indicates a population increase within the southern environs of Drogheda of only 2,457 to 2031 and 1,474 to 2027, the Plan period. Even allowing for an occupancy reduction size to 2.5 across the entire area this amounts to only a housing need of 907 across the Plan period.

We respectfully submit that this core strategy of the Plan, that is being further enforced under the Material Amendments, is in material contravention of RSES. The need for a co-ordinated approach to the planning of Drogheda and concerns of the Office of the Planning Regulator is emphasised in the Amendment to STH DRO OBJ 1, in which the added emphasis to prepare a Joint Vision and Urban Area Plan for Drogheda must be undertaken as a priority.

The implications of this is more clearly evident in releasing Sites 7 and 8 that are outside of the built up boundary of the town; and which is separated from the town by the railway and other non-developed land within Co. Louth. We note that Proposed South Drogheda Amendment no. 3 introduces that these and other lands surrounding them zoned for non-residential purposes, are to be developed in accordance with a Masterplan for the area, which would be subject to agreement by the Executive Officers of the Council. This area is currently devoid of infrastructure and contains 3 additional areas of White Lands that are zoned to protect strategic lands from inappropriate development that would impede the orderly expansion of Drogheda. The removing of the Phased approach to zoning would, in our considered opinion, lead to inappropriate and further unplanned development that would impede the orderly expansion of Drogheda in a compact form and undermine the effectiveness of the UAP in achieving this objective.

### **Is a realistic household size being used?**

The Draft Plan and Written Statement for the Southern Environs of Drogheda indicate a housing stock of 2,293 in 2016. Based on its population of 6,527 this amounts to an average household size of 2.85 in 2016. It is notable that this is slightly above the household size for Drogheda as a whole. The Material Amendments indicate that the housing stock has increased by 113 between 2016 and 2019; that there are 572 units that have extant permissions that are not yet built and a need for a further 1,631 units between 2020 and 2027. This equates to a target to have a housing stock of 4,609 by 2027 to serve its projected population of 9,827. This would indicate a reduction in the household size over this 9 year period from 2.85 to 2.13. This in our considered opinion is not supported by any local or strategic planning or population projection.

We respectfully submit that such a low household size is not justifiable and there is no evidence provided by the Council for the alleged ‘pent-up demand’ indicated in note 37 under Table 2.11 of the Material Amendments. We note that the projected population growth of the region and Drogheda has already been established under the National Planning Framework and the RSES. Deviations from this are therefore unjustifiable. In this regard we note that the draft Plan indicates a household size target of 2.5 for the County by 2026. We also note that the southern environs of Drogheda had an average household size of only 0.11 lower than the County in 2016. If we assume that the population increase to 2027 is correct – of 3,300 then the implications of household size is key to understand and projecting the housing stock requirements and therefore the required zoning for the Plan period. The following allows for the 50% headroom already taken into consideration under the Material Amendments of the Plan.

We respectfully submit that in any scenario the 157ha., which we have established is available for new residential development under the Material Amendments of the Draft Plan, is unjustifiable and reflective of the overzoning within the southern environs of Drogheda.

There is an established link between residential density and household size. The higher residential densities are by their very nature associated with apartment developments that contain low number of family units; whilst lower density schemes are usually reflective of larger residential and family housing. This means higher residential densities will result in a larger fall in household size, irrespective of societal changes. A review of the planning history of the southern environs indicates permissions being granted generally at or below the lower density scenario of 35 units per hectare. There is therefore no justification for the average household size / occupancy rate being taken as being 2.1 under the Material Amendments. In our considered opinion there is no justification for the household size and resultant household allocation between 2021 and 2027, which appears to be based on an unjustifiably low household size.

	Assumed average household size				
	2.86	2.7	2.6	2.5	2.4
Overall housing stock required	3,436	3,640	3,780	3,931	4,095
New housing stock required from 2016	1,143	1,347	1,487	1,638	1,802
New housing stock required from 2021 removing extant and already built	458	662	802	953	1,117
New zoning required at 35 units / ha.	13.1ha.	18.9ha.	22.9ha.	27.2ha.	31.9ha.
New zoning required at 45 units / ha.	10.2ha.	14.7ha.	17.8ha.	21.2ha.	24.8ha.

### The population target for Drogheda

The population target of Drogheda for 2031 under RSES is 50,000. This amounts to an increase of 9,044 from its population of 40,956 in 2016. The Material Amendments of the County Development Plan for the Southern Environs of Drogheda indicates that within Table 2.11 the population target for the area is 3,300. However, the overall zonings within the area has a capacity to generate a population of between 13,738 and 17,663.

We note in this regard the Draft Louth County Development Plan outlines a projected population increase of 6,914 to 2027. The two population projections amount to a population increase of 10,214 to 2027 that is above that of the population target increase for the town under RSES to 2031. The Draft Plan identifies 34.8ha. of infill or brownfields land with capacity to deliver 1,725 housing units. It also identifies 213ha. of land zoned for new residential uses that has capacity to build 7,455 – 9,585 housing units, which at a density of 2.5 household size amounts to a population increase of 18,638 - 23,963; excluding infill or brownfield development.

The level of undeveloped new residential zoning under both the Draft Louth Plan and Material Amendments of the Draft Meath County Development Plan means that the population of Drogheda as a settlement has the capacity to expand by between 26,093 and 33,548 during the next six years, with additional capacity on infill and brownfield sites.

We respectfully submit that it is abundantly clear that the level of residential zoning in Drogheda, when considered in relation to the Southern Environs or Drogheda as a whole represents a significant overzoning that will lead, in the absence of the UAP, to haphazard and non-compact development contrary to the proper planning and sustainable development of the area and contrary to the aim and objective of RSES.

### What is the capacity of remaining Phase 1 lands under the 2013 Plan?

The Phase 1 lands under the previous Plan comprised Site 5 and parts of Sites 1, 2 and 9 (see Map on page 4 of this submission). For the purpose of this exercise we are setting aside extant permissions.

	Site area <sup>1</sup>	What amount of land has been developed or subject to extant permission	Remaining housing capacity of previous Phase I zoned lands at 35/45 units / ha.	Remaining population capacity of previous Phase I lands <sup>2</sup>
Site 5	3.77ha.	0	132 / 170	330 / 425
Site 1	6.7ha.	Fully committed	0	0
Site 2	6.7ha.	5ha.	60 / 77	150 / 193
Site 9	6.7ha.	0	235 / 302	588 / 755
<b>TOTAL CAPACITY</b>			<b>427 / 549</b>	<b>1,068 / 1,373</b>

Note 1 – Refer to Table 8: Residential Land Zoning of Volume 5 – Additional Policies and Objectives for Local Area Plans – Drogheda Southern Environs LAP

Note 2 – based on occupancy size of 2.5

There remains significant capacity within the previously identified Phase 1 zoned land if the household size for the area remains as per the 2016 Census, or reduces to c. 2.5 as is show in the table above. This population increase would also be reflective of the existing balance of population between the two local authorities as is required under RSES.

We note that only parts of Sites 1, 2 and 9 were incorporated as Phase I lands under the 2013 Plan. Even if the Phase I lands were extended to the entire area of site 1, 2 and 9 then there would be significant additional capacity to absorb even the exaggerated housing demand indicated under the Material Amendments of the Draft Plan. There is therefore absolutely no grounds for the zoning of other sites

	Remaining site area	Additional housing capacity of additional site areas at 35/45 units / ha.	Population capacity of additional site area
Site 5	0	132 / 170	330 / 425
Site 1	5.18ha.	181 / 233	453 / 583
Site 2	4.97ha.	174 / 224	435 / 784
Site 9	13.91ha.	487 / 626	1,218 / 1,565
<b>TOTAL CAPACITY</b>	<b>34.27ha.</b>	<b>974 / 1,253</b>	<b>2,436 / 3,357</b>

There is therefore no justification under the Material Amendments to remove the phased approach to residential zoning given that there is sufficient capacity in the Phase I lands for the short to medium term when the development plan will be required to be reviewed as a matter of priority under the Joint UAP for Drogheda.

### Conclusions

We have set out under this submission a review and assessment of the quantum of residential zoning proposed under the Material Amendments of the Meath County Development Plan 2021-2027 as it relates to the Southern Environs of Drogheda. This assessment indicates that the Material Amendments are based on a material and significant overzoning of residentially zoned land in this part of Drogheda that is materially in contravention of RSES and the National Planning Framework. The current approach will lead to haphazard and non-integrated residential development that would be contrary to the core strategy of the Meath County Development Plan and RSES to encourage a sequential expansion of Drogheda in accordance with creating a compact form of urban development.

It is in the interests of the sustainable development of Drogheda to ensure that residential development occurs in a compact manner having regard to the following factors:

- Proximity to town centre;
- Environmental constraints;
- Availability of public transport;
- Availability of community and social infrastructure facilities with particular regard to educational facilities;
- The need to provide new road infrastructure to facilitate development; and
- Consistency with sequential approach to urban expansion and contribution to a compact urban form.



Having regard to this, we request the Material Amendments be amended as follows:

- Reinstatement of a phased approach to the zoning of land within the Southern Environs of Drogheda, with Phase 1 and Phase 2 lands to be identified under the amended table 2.11 of the Material Amendments as well as on the material amendments zoning map.
- Significant reduction in the level of available of residentially zoned land to ensure a more planned and compact growth to the Southern Environs of Drogheda;
- Transitional arrangement should not be removed from section 2.8.1.1 of the Plan; and
- Lands to the east of the railway line should not be subject to a Master Plan, but should be identified as Phase II Residential zoned lands not to be developed and to be reviewed in 2027.

We would be obliged if you will acknowledge receipt of this submission in due course and we would be happy to furnish any further information that you may require to deal with this matter.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'Anthony Marston'. The signature is written in a cursive, flowing style.

Anthony Marston (MIPI, MRTPI)  
**Marston Planning Consultancy**