



15 March 2024

Planning Section,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth A91 W20C

Cc: Senior Executive Officer, Planning Section, Meath County Council, Buvinda House,
Dublin Road, Navan, Co. Meath C15 Y291

Dear Sir/Madam,

Re: Pre-Draft Issues Paper Drogheda Joint Local Area Plan

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995.

We seek to provide submissions on forward planning, development control and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage. We welcome the opportunity to comment on the Drogheda Joint LAP Issues Paper. We have considered the questions provided under each section of the Issues Paper, and our comments below on each section are a response to these questions, where they were relevant. Our comments will deal with both built/ cultural heritage and natural heritage, as the matters appear in the Issues Paper. Ireland's national heritage is defined in the Heritage Act, 1995 as including: 'monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens, and parks and inland waterways'.

National and Local Policy Context

It is important to state from the outset that the **National Planning Framework – Project Ireland 2040**, identifies “*Enhanced Amenities and Heritage*” as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. National policy objectives 16, 17 and 52 in the NPF give further support to this ambition and there is a need to reflect this in LAPs.

Development Plans – Guidelines for Local Planning Authorities were prepared for county and city councils in June 2022. Within these guidelines, there are detailed requirements for local forward planning objectives. Features of special architectural,

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historical, or natural value are our heritage assets, and mandatory objectives under the themes of 'heritage and landscape' have been identified throughout these guidelines. There is an obligation on local authorities to ensure the inclusion of such objectives in their statutory plans.

The 4th edition of Ireland's **National Biodiversity Action Plan (NBAP) 2023 – 2030** was published in January 2024. The NBAP states that "local authorities play a key role in biodiversity conservation through the planning system". There are several targets identified under Outcome 2A (*The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced, regarding designated areas and protected species*) that are relevant for local authorities in their plan making functions. However, of key importance is Outcome 3C (*Planning and development will facilitate and secure biodiversity's contributions to People*). Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans. In addition, actions 1B9, 1C5 should also be key considerations for all plans.

Heritage Ireland 2030 was published in February 2022, and details several action points relevant for local authorities and these should be included in local area plans. Most importantly are Action 22 - *Introduce policies on supports for urban biodiversity and tree planting*; Action 26 - *Support nature-based solutions for land-use management*; and Action 37 - *Integrate heritage considerations into urban and rural regeneration to ensure that built and natural heritage objectives underpin the planning and development process and inform the 'Town Centres First' policy approach*.

The **Guidelines for Planning Authorities on Architectural Heritage Protection** were developed in 2004 and give expression to the provisions of the Planning and Development Act 2000, with regards to built heritage. Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on **Archaeology in the Planning Process** through **Planning Leaflet 13**.

Both the **Meath and Louth County Development Plans** have comprehensive sections on both cultural and natural heritage. Policy NBG2 of the Louth County Development Plan 2021-2027 seeks to *promote and implement the objectives of the Local Biodiversity Action Plan* for County Louth. Whilst Policy HER POL 1 of the Meath County Development Plan 2021-2027 seeks the strong protection of Meath's cultural assets. Concurrently, the Louth CDP 2021-2027 Policy BHC 9 emphasises the importance of walled towns such as Drogheda.

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Specific comments on the Issues Paper

Strategy for Future Development in Drogheda

Drogheda is a member town of the Heritage Council's Irish Walled Town Network. Formed in 2005, the IWTN seeks to ensure that the walled towns of Ireland become better places in which to live, work and visit. The overall aim is to streamline the efforts of local authorities and communities involved in the management, conservation, and enhancement of historic walled towns. A Conservation Plan exists for the town walls and other defences of Drogheda and should inform, and be integrated into, the Joint LAP.

Therefore, it is unfortunate that this unique context has not been captured in the "Strategy for Future Development in Drogheda." Drogheda is only one of 29 towns in the IWTN, and there is a good opportunity for the LAP to ensure that heritage is at the heart of the future development of the town and should be incorporated into the vision for this LAP.

Height and Density

While sustainable settlement patterns and compact growth ambitions are supported (see climate action section below also), there appears to be a misguided conflation with regards to high buildings and high density. High density does not necessarily mean high buildings. High coverage low height can achieve relatively high density in urban locations. The existing historic core of Drogheda (e.g. Cord Street) has relatively high density that achieves family homes.

There are two particular concerns regarding taller buildings when it comes to heritage:

1. Drogheda has several church spires and other historic landmarks. These are essential features to the character of the Drogheda skyline as a historic walled town. Taller buildings have the potential to alter their setting while detracting from the historic character of the town. Some views analysis to establish protected views and prospects should be part of the LAP.
2. Taller buildings tend to accommodate smaller units (1 and 2 bed flats). This inevitably leads to displaced demand for family homes which will lead to greenfield expansion, where low density development is too quickly accepted, therefore resulting in sprawl that inevitably puts pressure on the country's natural and cultural heritage.

Where high density is needed, this should be achieved by well-designed townscape/perimeter blocks as opposed to single landmark tall buildings. The LAP needs to carefully consider and understand how it achieves high density (which is needed). This does not necessarily mean taller buildings.

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Urban Design and Placemaking

We strongly support the identification of opportunity sites. This is the specificity that is needed from local areas plans. Therefore, we encourage the LAP to exhaust the potential for brownfield site locations before any greenfield expansion is considered. A proactive effort is required in this regard. Within opportunity sites, it is key to identify natural and built heritage constraints/assets; these should then inform the design/development approach to the site. In the first instance, development should not negatively impact the integrity or the setting of important features of natural, archaeological, and architectural interest.

Furthermore, the most successful public realm proposals anchor off the heritage assets that exist, using them as the centrepiece in new public realm design. This should be actively pursued. There are examples throughout the country where this exists, for example Elizabeth Fort in Cork. We also strongly recommend that the LAP maximise opportunities for public realm/pedestrianisation in the town. This can successfully contribute to the perception and experience of the built historic environment, which is all too often car dominated. Good examples exist (e.g. Tramore) that can be replicated elsewhere.

Residential Development/Compact Growth

Any greenfield development should make efficient use of land. Minimum density requirements are likely to be needed. This is to ensure that the built environment is not excessively expansionist in its footprint. This is the primary threat to natural and built heritage assets, with particular concern for habitat and biodiversity loss.

We strongly recommend that both councils consult in detail, the *Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities*, published in January 2024, with specific concentration on the relevant sections for the settlement size of Drogheda. This guidance should then inform and be incorporated into the LAP. These guidelines relate to density, placemaking, and development management standards insofar as how they should be applied in specific contexts.

Climate Action

Policies to reduce car reliance are essential and are needed; however, this needs to be supported by tangible objectives. To achieve greenhouse gas emission reductions in the built environment, two objectives need to be pursued:

1. Ensure that the built form makes efficient use of land i.e. not sprawling or excessive in land take.
2. Ensure that non-car-based alternatives are viable. On this particular point there is a need for:
 - a. Safety during the journey and secure storage at both ends of the journey for cyclists. Cycle parking standards are needed for all development and

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- for all uses (including locker and shower facilities in workplaces), while active route planning for cycle lanes needs to be carried out for the LAP.
- b. There is a need to ensure that excessive parking expectations do not compromise reuse of buildings, or the development of well-located sites in the town.
 - c. Ensure development seek locations around existing or planned public transport routes (unless flood risk or heritage designations prevent this).
 - d. Active reuse of existing building stock (embedded carbon), which does constitute much of our vernacular and urban heritage building stock.

The *development plan guidelines* rightly emphasise that objective 10(2)(n) is to promote sustainable settlement and transportation strategies in urban and rural areas, in relation to the location, layout and design of development. At the level of first principles, this is the most important role the planning system has in reducing greenhouse gas emissions i.e. the cause of climate change. In this context it is important that the joint Drogheda LAP:

- Ensures that any greenfield release makes efficient use of land, whilst providing the mix of homes necessary, and being at a density that is conducive to public transport roll out and cycling and walking.
- Existing brownfield sites and well-located sites within the urban boundary are preferred in a sequential approach to development.

Achieving this, will reduce greenhouse gas emissions from the built environment but it will also ensure that land take is restrained, and does not pose undue threats to cultural and natural heritage.

Regeneration

An active search to identify a brownfield inventory is needed for site identification. While it is essential that county development plan policies in terms of residential amenity and parking standards are not automatically assumed for core regeneration sites. It is likely that some of these standards are excessive and not conducive to compact growth or regeneration, or the reuse of heritage buildings (as noted previously).

Tourism

The development of Drogheda should be informed by heritage. Heritage protection is essential for a viable tourism product. This should be recognised in the Joint LAP. The internationally important Brú na Bóinne site is nearby further aiding the 'heritage' brand of Drogheda, as is the River Boyne itself (Special Area of Conservation). The development of a new National Park at Dowth (c. 9km from Drogheda) further increases opportunities for Drogheda. However, the benefits that these assets could bring to the town will only be maximised if heritage is protected and promoted as part of the LAP.

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Green Infrastructure, Open Space, Recreation, and Natural Heritage.

Firstly, it is important to note that the new *NBAP 2023-2030* has a list of targets that are relevant for planning authorities regarding their statutory plan making functions. We would strongly recommend that each local authority, through their biodiversity officers, audit this document to identify the relevant actions/ targets for land use statutory plans, and subsequently reflect them in the Joint LAP.

The *Development Plans Guidelines* detail mandatory heritage and landscape objectives in Chapter 9. Whilst these may be more relevant for county development plans, there is a need to ensure that the Drogheda joint LAP ensures that there is compliance with these objectives. These guidelines also rightly note that the majority of the country “lies outside of the network of protected sites, and that there are many other sites which are of local importance for flora and fauna”. Local authorities have an important role to play in preventing the loss of such sites. Features such as hedgerows, river corridors, ponds and small stands of trees etc. provide important habitats; and plans can play an important role in protecting these assets.

It is with this in mind that The Heritage Council strongly support measures that enhance biodiversity in, and around, urban areas. This is likely to include public land, parks etc but there will also be a need to protect existing hedgerows/ trees when new development is proposed. This is possible on brownfield sites, but more acutely in greenfield development. There is often needless removal of mature trees and hedgerows, of considerable character and ecological value, as part of site works to ‘tidy’ the site before construction commences. From an ecological view these features are one of few ecological corridors/ hotspots in and around urban areas. Opportunity sites within the town or any phased greenfield release should have stringent design standards for retention of natural features.

We would remind both Meath and Louth County Councils that this is a requirement of National Policy Objective 58 of the NPF, insofar “*as integrated planning for Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans*”; while National Policy Objective 60 (*Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance*) is also a requirement. In addition, Policy HER POL 28 in the Meath County Development Plan 2021-2027 specifically seeks to reduce adverse impacts on heritage assets (designated or not), as does Policy NBG 9 of Louth County Development Plan 2021-2027.

The development plan guidelines also specifically seek the protection of areas of amenities (natural features) namely (i) Special Amenity; (ii) Landscape Conservation Areas; (iii) Tree Preservation Orders; and (iv) Public Rights of Ways. Within an urban area not all such natural features will be relevant, however public rights of way are often

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essential for not just the experience of the landscape, but also the experience of local heritage, in both towns and rural areas. The Boyne Valley is an important landscape in and around Drogheda, therefore the design of new developments, envisaged in the LAP should bear this in mind. While we would recommend that public rights of way are maintained or expanded where necessary.

The Heritage Council would also encourage active TPO work in the form of a fresh 'walk about town' assessment of trees of important ecological and character value with the view to identify further TPOs. We recommend that "*Amenity Trees and Woodlands – A guide to their Management in Ireland*" published by the Tree Council of Ireland, be identified as a source in the relevant section of the LAP, which should consider the inclusion of a green network strategy, or similar within it.

There is also opportunity to manage flood risk via nature-based solutions, whereby lands liable to flooding should be avoided in terms of development, while at the same time natural habitats should be allowed to replenish. Flood plains should be the "low hanging fruit" for ecological restoration measures given their unsuitability for development. Whilst it is recognised that in urban areas, where development has already taken place, flood relief schemes may be needed; in the first instance, a whole river basin catchment approach to managing flooding should be pursued (as noted under actions 2D6 and 2D7 of the NBAP). Any flood alleviation measures for the town should include an assessment of solutions upstream and in the transitional waters (and surrounding land uses) in the Boyne estuary before moving onto hard physical infrastructure in the built environment.

Built Heritage and Archaeology

The *Development Plan guidelines* also identified mandatory objectives for architectural heritage which include Architectural Conservation Areas, and the Record of Protected Structures. Similar to our comments on regeneration; development management standards identified in county development plans should be applied flexibly to protected structures. Standards by nature may not be feasible in historic buildings and there is a need to recognise this in the LAP.

In addition, it is often the case that heritage led regeneration is the best design solution for redevelopment of inner urban cores. The historic town, its features, character and aesthetics are in situ quality assets. This cannot be recreated or replicated; therefore, regeneration proposals can give prominence to such built heritage assets through good scheme design. Conflict is not inevitable between heritage protection and regeneration/sustainable settlements. Whilst the Heritage Council do strongly insist on the protection of existing sites on the Record of Protected Structures.

We note the questions provided in the Issues Paper, specifically 'How can Drogheda's archaeological and built heritage be protected?' Drogheda has been a member of the Heritage Council's Irish Walled Towns Network since 2005. This is in keeping with Drogheda's status as a medieval walled town that rivalled Dublin in terms of scale and volume of trade. The Heritage Council provided funding in 2015-16 to enable

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conservation planning and works at the Saint Mary d'Urso monastic complex and these works have made a considerable contribution to the public realm. We suggest the momentum generated by those works should be built upon. However, we hold the view that this medieval heritage could be better managed and interpreted, in terms of conservation of the remaining stretches of the medieval town wall; their incorporation into high quality public spaces; and in terms of good interpretative resources for visitors and residents. The Heritage Council provided funding for preliminary public realm design concepts for the area around Laurence's Gate in 2017 and while traffic has been redirected, there has not been a marked improvement in this space. We see this as a key project for Drogheda's public realm and as a potential signature project to incorporate its medieval heritage into a high-quality public space. In 2024 the Heritage Council has awarded funding for a conservation study of the stretch of town wall running south from Laurence's Gate (Featherbed to Bachelors Lane) and we look forward to the successful completion of this project.

The Heritage Council funded the *Conservation Plan: Town walls and other defences of Drogheda* (2006). This was a partnership between the Heritage Council and the then Drogheda Borough Council. We suggest that review of the implementation of this plan, in particular the conservation and interpretation actions, would be beneficial. As suggested previously, the LAP should incorporate key elements of this plan.

A considerable number of important archaeological excavations have taken place in Drogheda's historic core which have revealed artefacts and structures, from the medieval past, however there has been little to build upon the results of these works in terms of interpretation, or in using the results to create a sense of time depth for the city, in a comparable way to how this has been managed in Waterford, for example. We recommend an assessment of the results of these excavations be carried out and how they could contribute to the historic character of the city.

To answer the questions of protection of the built and archaeological heritage as well as sensitive reuse and regeneration we suggest that serious consideration is given to the appointment of an Architectural Conservation Officer. We submit that grant funding is being lost in Drogheda in the absence of such a role and that this is to the detriment of the historic character of Drogheda.

Strategic Environmental Assessment/ Appropriate Assessment

There will be an SEA and Appropriate Assessment required for the LAP. There is a need to ensure that all future policies drafted are individually assessed against the SEA objectives, when the time comes. The Heritage Council recommends that the SEA guidance prepared by the Office of the Planning Regulator (OPR) be consulted when both councils are preparing the SEA for the Joint LAP.

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Conclusion

The Heritage Council strongly encourage both Meath and Louth County Councils to acknowledge the primacy of Drogheda's heritage resource. The built and natural heritage of the town should be the focus for guiding any future strategy. We recommend that this important heritage and character guide a sustainable future development trajectory for the town and its environs.

I trust these comments will be considered carefully as Louth and Meath County Council(s) progress the Drogheda joint Local Area Plan.

Yours sincerely,

Ian Doyle
Head of Conservation

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