

Statement of Consistency

**For a
Strategic Housing Development**

**By
Ravala Limited**

**at
Newtown, Marsh Road and McGrath's Lane/Railway Terrace,
Drogheda, Co. Louth**

**With
Drogheda Borough Development Plan 2011-2017 (As Varied and Extended)
and Louth County Development Plan 2015 – 2021**

**And
Section 28 Guidelines**



August 2019

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1.0 INTRODUCTION & LEGISLATIVE BACKGROUND

This is a 'Statement of Consistency' in support of a Strategic Housing Development planning application under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016 in respect of a proposed residential development with supporting neighbourhood and employment uses consisting of 450 residential units and 4,100.4m² of non-residential floorspace (office, crèche and neighbourhood uses) on a 9.68 hectare site at Newtown, Marsh Road and McGraths Lane/Railway Terrace, Drogheda, Co. Louth. The planning application is made by Stephen Ward Planning and Development Consultants Limited on behalf of Ravala Ltd. The applicant seeks a ten year planning permission.

A pre-application consultation request was made by the applicant to An Bord Pleanála on the 31st of July 2018. By letter dated 13th of August 2018 An Bord Pleanála informed the applicant that in accordance with Section 6 of the Planning and Development (Housing) and Residential Tenancies Act 2016, An Bord Pleanála had decided to accept the request to enter into consultation.

A pre-application tripartite consultation meeting under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016 took place on the 17th of September 2018 at Louth County Council Offices, Millennium Centre, Dundalk (Case Ref. ABP-302215-18). Subsequent to this meeting, the applicant received An Bord Pleanála's Notice of Pre-application Consultation Opinion by letter dated the 2nd of October 2018. A full response to the Option is provided under separate cover by Stephen Ward Town Planning and Development Consultants.

The statutory Development Plan affecting the proposed development site is the Louth County Development Plan 2015-2021 and the Drogheda Borough Council Development Plan (DBDP) 2011-2017 (as varied, and as extended under Electoral Local Government Planning and Development Act 2013 Section 28 11(c) (a) & (b)). The development area in its entirety is zoned for 'Drogheda Transport Development Area'.

This SHD has been subject to Environmental Impact Assessment and Stage 2 Appropriate Assessment and is accompanied by a Natura Impact Statement and EIAR.

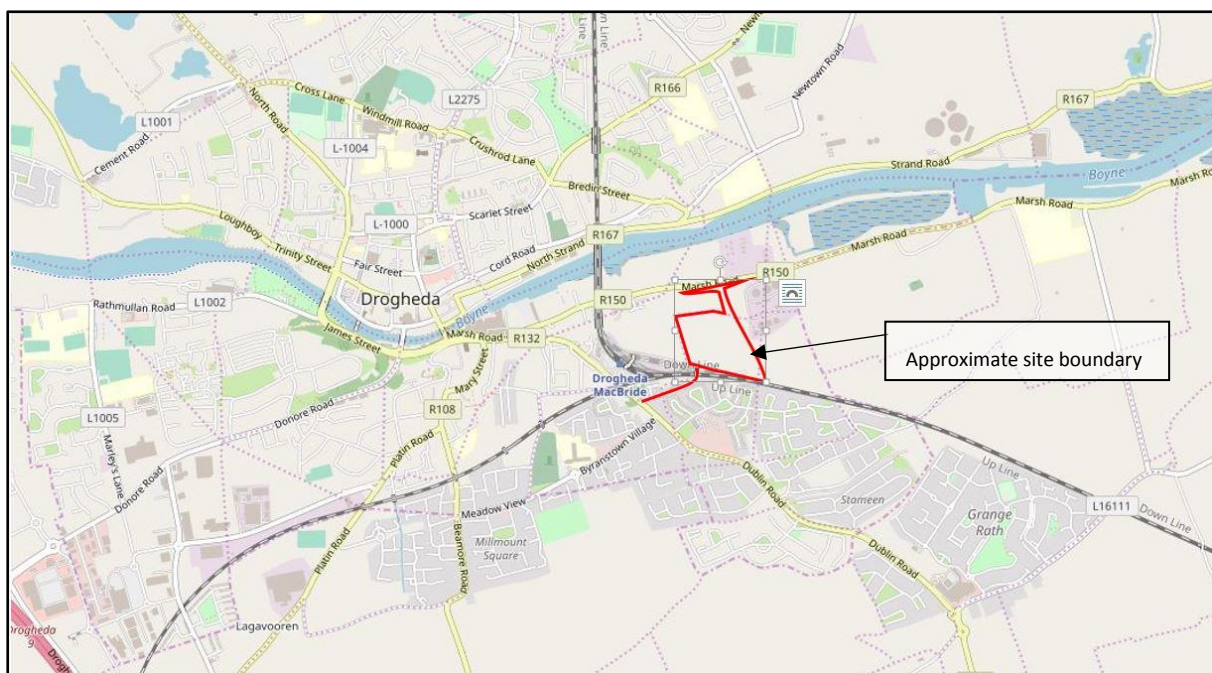


Figure 1 – Location & Context of Proposed Development Site

1.1 CONTENT AND FORMAT OF STATEMENT OF CONSISTENCY

This statement demonstrates how the proposed development, in the opinion of the prospective applicant, is consistent with both the policies and objectives of the Louth County Development Plan 2015-2021 and the Drogheda Borough Development Plan 2011-2017 (as varied and extended) and relevant Section 28 Guidelines.

Prior to setting out in detail how the proposed development is consistent with local planning policy and Section 28 Guidelines, this statement first provides a brief overview of national and regional policy compliance, a detailed description of the proposed development site, its surroundings and its context within the Drogheda settlement area followed by a detailed description of the proposed development itself.

1.2 BRIEF OVERVIEW OF NATIONAL AND REGIONAL POLICY

1.2.1 PROJECT IRELAND 2040 - NATIONAL PLANNING FRAMEWORK

Drogheda is recognised of being important in the context of a Dublin Belfast Corridor and for its important links with Dundalk and Newry. Drogheda is to be targeted for growth and investment. It is a key policy of the Framework:

“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” (p. 35)

It is submitted that achieving high densities as proposed adjacent to a high capacity rail line next to the town centre is a prime example of compact, sequential and sustainable development.

With specific reference to the Dublin-Belfast economic corridor, the Framework seeks to develop this corridor by:

“Effectively planning and developing large centres of population and employment along the main economic corridor, including in particular Drogheda and Dundalk”

It is a National Policy Objective to *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location” (p.93).*

National policy encourages higher density development at or close to public transport. The proposed development has a residential density of 62 dwellings per hectare¹ and the application site is within 600 metres walking distance from Drogheda train station. The development site in its entirety is zoned for ‘Drogheda Transport Development Area’ (DTDA) and residential and commercial are ‘permitted uses’ under this zoning. The lands are not subject to any phasing as per the Core Strategy contained at Variation No. 1 of the Drogheda Borough Development Plan 2011-2017.

National Policy Objective 73c states *“Planning authorities and infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development”.*

¹ Net site density based on site area of 7.25ha which excludes the LIHAF funded access road and its embankments/associated landscaping. The LIHAF Road embankments/landscaping do not form part of the open space provision for the proposed development.

The proposed development site is to be accessed from a new access road running broadly north-south towards the eastern boundary of the site. This access road was approved under Planning Application Ref. No. 17/387 but is also contained within the application red line boundary for the proposed Strategic Housing Development. LIHAF funding has been allocated for the construction of this road as critical enabling infrastructure works for this key development area in Drogheda.

1.2.2 REBUILDING IRELAND – ACTION PLAN FOR HOUSING AND HOMELESSNESS (2016)

Rebuilding Ireland – Action Plan for Housing and Homelessness was launched in 2016 with the aim of doubling the annual level of housing output to 25,000 homes per annum over the period of 2017-2021. The achievement of the Plan’s core objectives falls under five pillars. The proposed development falls under ‘Pillar Three – Build More Homes’ with the key objective to “*Increase the output of private housing to meet demand at affordable prices*”. A crucial measure introduced to achieve the Government’s aim is the Local Infrastructure Housing Activation Fund (p.57). According to the 3rd quarterly progress report (Action Plan for Housing and Homelessness, May 2017), this fund enables infrastructure works between 2017-2019 that will facilitate the scaling up and accelerated development of housing on key development sites (p.9).

The proposed development assists in the achievement of Rebuilding Ireland to build more homes by providing 450no. new homes within 600 metres of Drogheda Train Station and c.1.5km of Drogheda Town Centre. The proposed development site is to be accessed from a new access road running broadly north-south towards the east of the site. This access road was approved under Planning Application Ref. No. 17/387. LIHAF funding has been allocated for the construction of this road. The road is within the red line area of the application. There is therefore no infrastructural or ‘consent’ impediment to the delivery of this SHD application as a standalone development.

1.2.3 LOCAL INFRASTRUCTURE HOUSING ACTIVATION FUND (LIHAF)

In March 2017, as part of *Rebuilding Ireland - Action Plan for Housing and Homelessness* in excess of €1.2 million in funding was approved by the Department of Housing, Planning, Community and Local Government to carry out significant road improvement works to this area of Drogheda under the Local Infrastructure Housing Activation Fund (LIHAF). It is envisaged that this LIHAF approval will facilitate the construction of 260 housing units by 2021, with the potential to construct 760 overall. The application site would comprise 456 of these 760 overall dwellings. The 133no. houses immediately east permitted under P.A. Ref. 17/387 also contributes towards achieving the LIHAF target of 260 dwellings and the potential to achieve 760 dwellings.

Local Authority	Project Name	Detail of infrastructure	No of housing units to be provided by 2021	Total potential for housing units	Total Allocation (€m)
South Dublin	Adamstown SDZ	Roads, park	1000	2500	20.00
	Clonburris SDZ	Surface Water upgrade works	1000	8000	3.00
	Corkagh Grange	Access Road, Pumping Station	1000	1000	4.39
Kildare	Naas	Inner Relief Road	800	2400	6.0
	Maynooth	Eastern relief road and bridge	800	1700	14.50
	Sallins	Community amenity	250	750	0.93
Kilkenny	Ferrybank	Ferrybank Park	200	390	0.62
	Western Environs	Distributor road, park	800	3690	6.76
Limerick	Greenpark	Distributor Road	400	700	4.93
	Mungret	Distributor Road	450	2700	10.50
Louth	Mount Avenue, Dundalk	Access road	200	1200	3.33
	Newtown, Drogheda	Access Road	260	760	1.22
Meath	Fargahstown, Navan	Distributor Road	400	1600	5.68
	Ratoath	Outer Relief Road	300	370	2.50
Tipperary	Ardeeha Lower, Clonmel	Distributor Road and roundabout	200	200	0.78
Waterford	Gracedieu	Access road with roundabouts	200	2200	1.32
	Kilbary	Distributor road	450	1500	3.39
Westmeath	Brawny Road, Athlone	Access road	200	670	1.83
TOTALS			22,830	69,240	226.46

Figure 2 – Extract from List of Approved Projects under Local Infrastructure Housing Activation Fund (LIHAF) March 2017. Funding for access road to the proposed SHD circled in red.

1.2.4 REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR THE EASTERN AND MIDLAND REGIONAL ASSEMBLY (RSES)

The RSES growth strategy targets the Regional Growth Centres of Athlone, Drogheda and Dundalk as Regional Drivers. Drogheda is set to become a self-sustaining regional driver, growing to City Scale with a population target in the region of 50,000 by 2031(p.58). It is an objective to create compact mixed use employment and residential communities in key locations and in proximity to established residential areas and transport hubs (p.59). The DART is to be extended to Drogheda under the expansion programme identified in the National Planning Framework and McBride station is recognised as the main public transport hub for Drogheda (p.59).

The Drogheda Transportation Development Area (DTDA) includes lands to the south, west and north of McBride Train Station and railway line. The concept for the development of this area is based on high-density, mixed use development (para. 5.3, DBCDP). The application site has been identified of strategic importance in terms of residential development through the funding of an access road permitted under P.A. Ref. 17/387 by the Local Infrastructure Housing Activation Fund. The proposed development includes provision of this access road. The mix of uses proposed across the application site will provide a successful new urban neighbourhood in proximity to the town centre and McBride Train Station. The layout has been designed to integrate into surrounding lands for future development should they be identified by the future Joint Urban Area Plan.

The RSES provides the basis for the integration of land use and transport planning in the Region, informing the preparation and implementation of plans, programmes and projects at all levels. According to the RSES, “for urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transportare prioritised” (p.181).

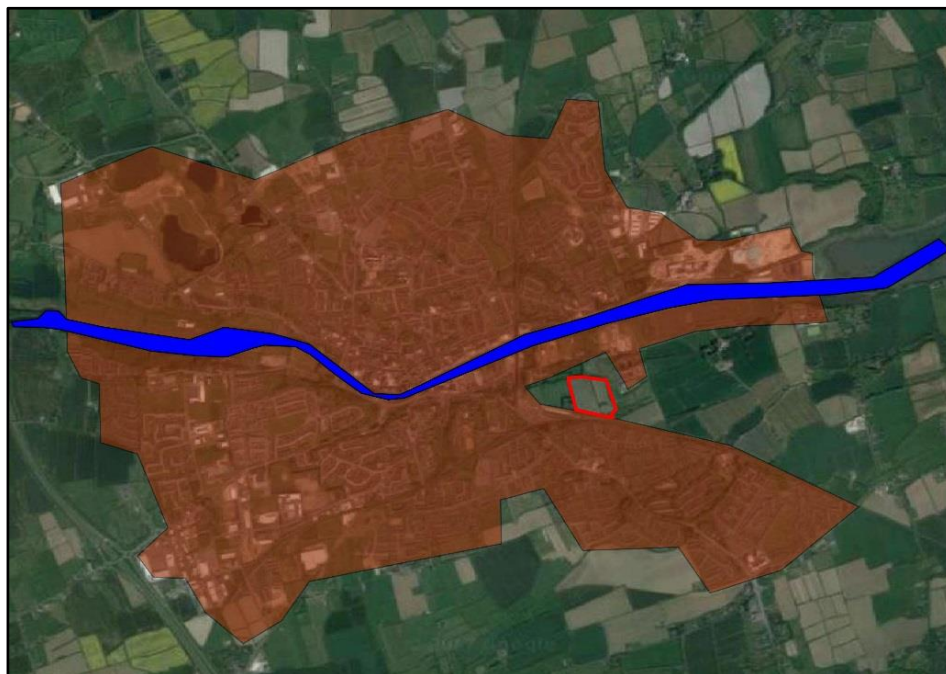


Figure 3 – Approximate Boundaries of Application Site (outlined in red) in Context of Urban Area of Drogheda

As illustrated by figure 3 above, the application site is contiguous to the existing urban area of Drogheda. This area of undeveloped land has left a wedge shape in the otherwise compact development of the town. The site offers the most highly accessible location for residential development in terms of proximity to the railway station and the town centre as well as local schools.

The RSES supports the ‘10 minute’ settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes (p.145). It is a Regional Policy Objective (RPO 8.7) “To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use”.

The proposed development includes supporting land uses with neighbourhood units surrounding a neighbourhood square that could provide for cafes, restaurants and local shops as well as office accommodation for future employment. The site is c.350 metres from the Dublin Road via McGraths Lane/Railway Terrace where there are existing local shops and services including doctors’ offices as well as a large primary school. The site is c.1.5km, as measured from the most southern boundary at McGrath’s Lane, from Scotch Hall Shopping Centre or a 15minute walk via Marsh Road. There is an existing footpath along Marsh Road to Scotch Hall Shopping Centre. A mobility management plan has been prepared by Waterman Moylan Consulting Engineers as part of this SHD application. It is submitted that this MMP together with the DMURS compliant layout proposed which prioritises pedestrians and cyclists, will assist in achieving a change in behaviour towards more sustainable modes of transport.

1.3 SITE CONTEXT AND SURROUNDINGS

The site is located south of the Marsh Road with mostly Greenfield land zoned for employment uses located between the site and the Road. The Dublin-Belfast railway line runs along the southern boundary of the site, with McGraths Lane running between the railway line and the site and joining to Railway Terrace which runs south towards the Dublin Road (R132). The residential development of Wheaton Hall is located directly south of the proposed development on the opposite side of the railway line. Drogheda railway station is located approximately 100 metres west of the nearest boundary of the application site. The railway station is c600 metres or 5-7 minute walk from the southern site boundary via McGrath's Lane/Railway Terrace and the Dublin Road. The Drogheda Wastewater Treatment Plant is directly east of the application site. The most northern area of the site is c 870 metres or c.10 minute walk to the station via McGrath's lane. These walk distances are within acceptable distances for heavy rail as per the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) and the Sustainable Urban Housing: Design Standards for New Apartments (2018).The Regional Spatial and Economic Strategy for the Eastern and Midland Region has confirmed the DART will be extended to Drogheda (para. 5.6).



Figure 4 - 500m radius from the approximate centre of site

It is strongly contended the site is a sequentially preferable site well within the built-up area of Drogheda. The development of the site in the manner proposed would also make a significant contribution towards the RSES objective of targeting 30% of residential development within the built-up area of the settlement.



Figure 5 -Walking distance of 600m from site to Drogheda Train Station via McGrath's Lane/Railway Terrace

The lands are essentially within/encompassed by the urban area of Drogheda, albeit within a largely undeveloped 'wedge' that juts in towards the centre of Drogheda. Land within this wedge is identified and zoned for development under the provisions of the Drogheda Borough Development Plan 2011-2017.

1.3.1 PERMITTED DEVELOPMENT

Planning history includes the granting of permission for an access road which will serve the proposed development as well as 133 dwellings immediately east that have the benefit of planning permission (P.A. Ref 17/387). The access road is approved for funding under the Local Infrastructure Housing Activation Fund (LIHAF). The 133 permitted dwellings will contribute towards the 260 dwelling target contained as part of the LIHAF conditions with the balance of housing numbers required to comply with the LIHAF conditions to come from the development as now proposed under this Strategic Housing Development application. The approved access road (P.A. Ref. 17/387) will serve the 133 dwellings as well as the proposed development. This has influenced the design and layout of the current proposal in addition to the characteristics of the site itself. The access road is included within the site boundary of this application site to ensure the delivery of the road in advance or in tandem with development proposed under this SHD application and to demonstrate the delivery of the road is not dependent on the achievement or implementation of any other consents.

1.3.2 SOCIAL INFRASTRUCTURE CAPACITY STUDY

Services and Amenities

The site's proximity to the Town Centre of Drogheda means that it is close to and accessible to a wide range of existing amenities and services, including public transport, schools, recreational, medical and retail facilities. Facilities in the area are identified on Figure's 6, 7 and 8.

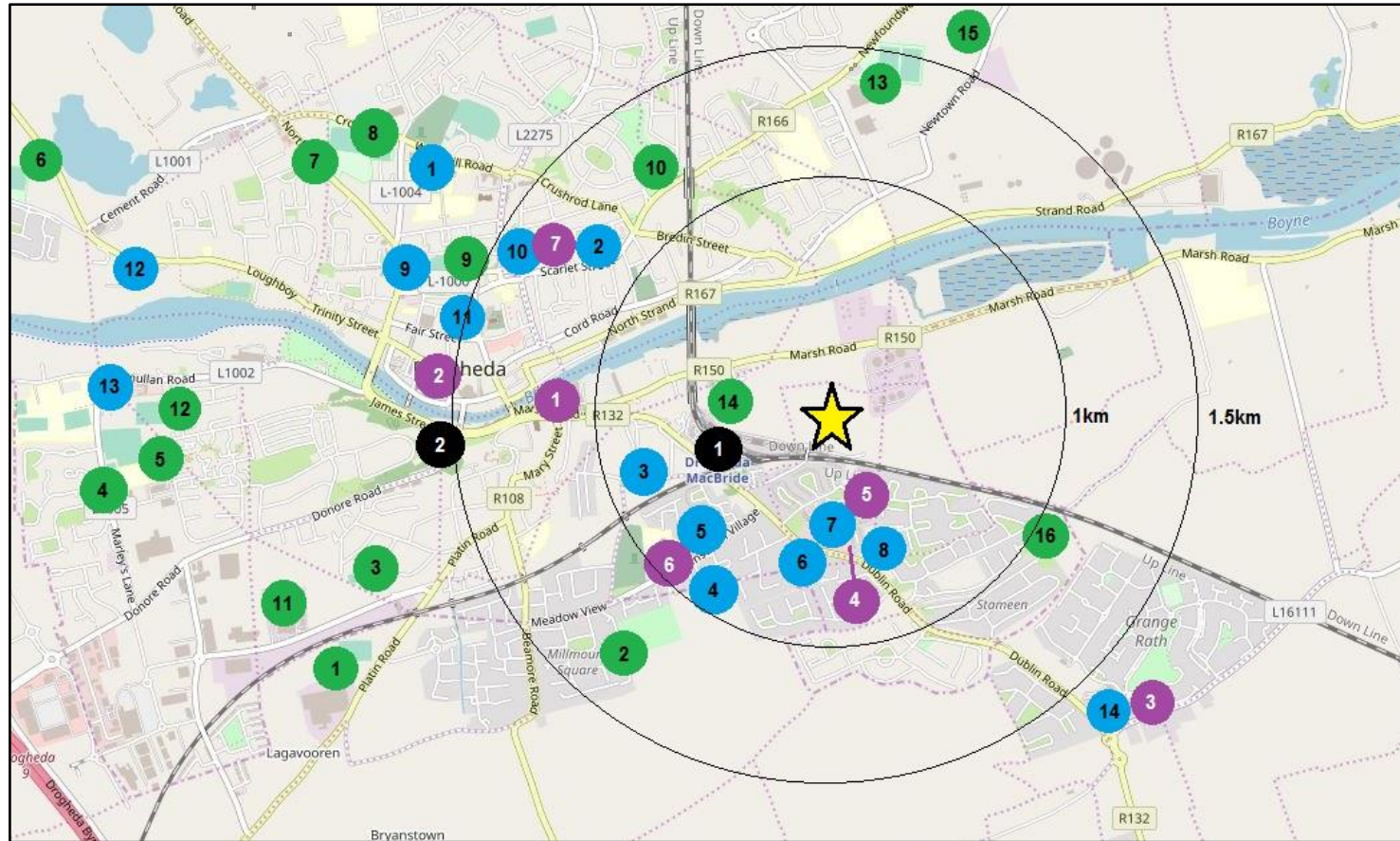


Figure 6 – Services & Amenities in Surrounding Area

Application Site		Table 1 – Services & Amenities in Surrounding Area	
Transport Services		Medical / Health Facilities	①
Drogheda 'MacBride' Train Station	①	Retail/Local Shopping Facilities	①
Drogheda Bus Station	②	Sports & Leisure Facilities	①

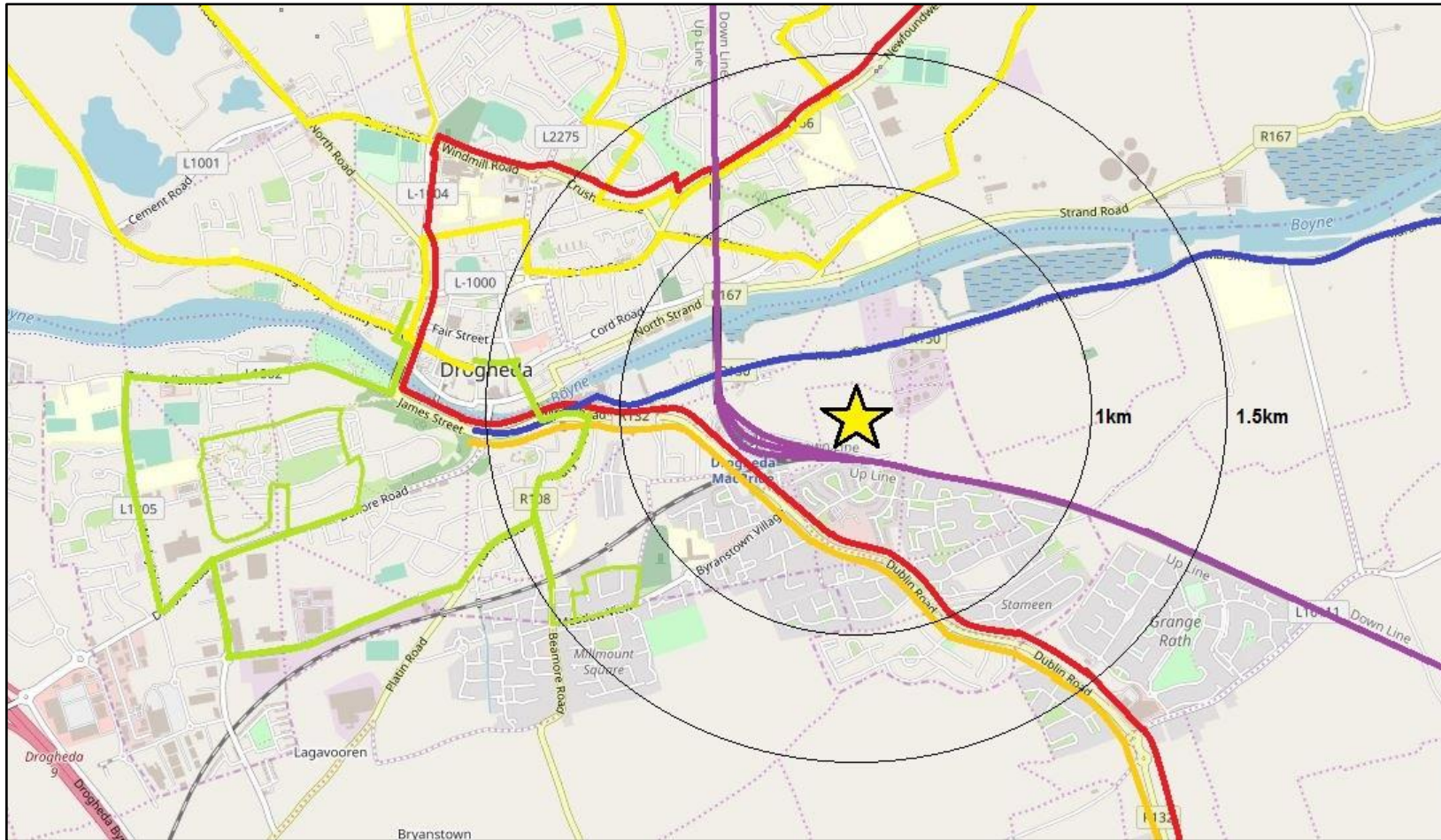


Figure 7 – Public Transport Routes

Train / Bus route(s)	Table 2 – Public Transport Routes
Northside bus route (173)	Yellow line
Southside bus route (173)	Green line
Drogheda – Balbriggan – Dublin Airport – Dublin (101)	Orange line
Aston Village – Drogheda Bus Station – Balbriggan – Dublin Busaras – Dublin Merrion Square – Dublin Wilton Terrace (101x)	Blue line
Drogheda – Bettystown – Laytown (D1)	Red line
Commuter / Intercity / Enterprise Services to Belfast / Dundalk / Dublin / Rosslare Harbour	Purple line

School Demand

There are a number of both primary and post-primary schools located within the area. The location of all existing schools relative to the site are shown in Figure 8. An assessment of Childcare Facilities is provided under separate cover.

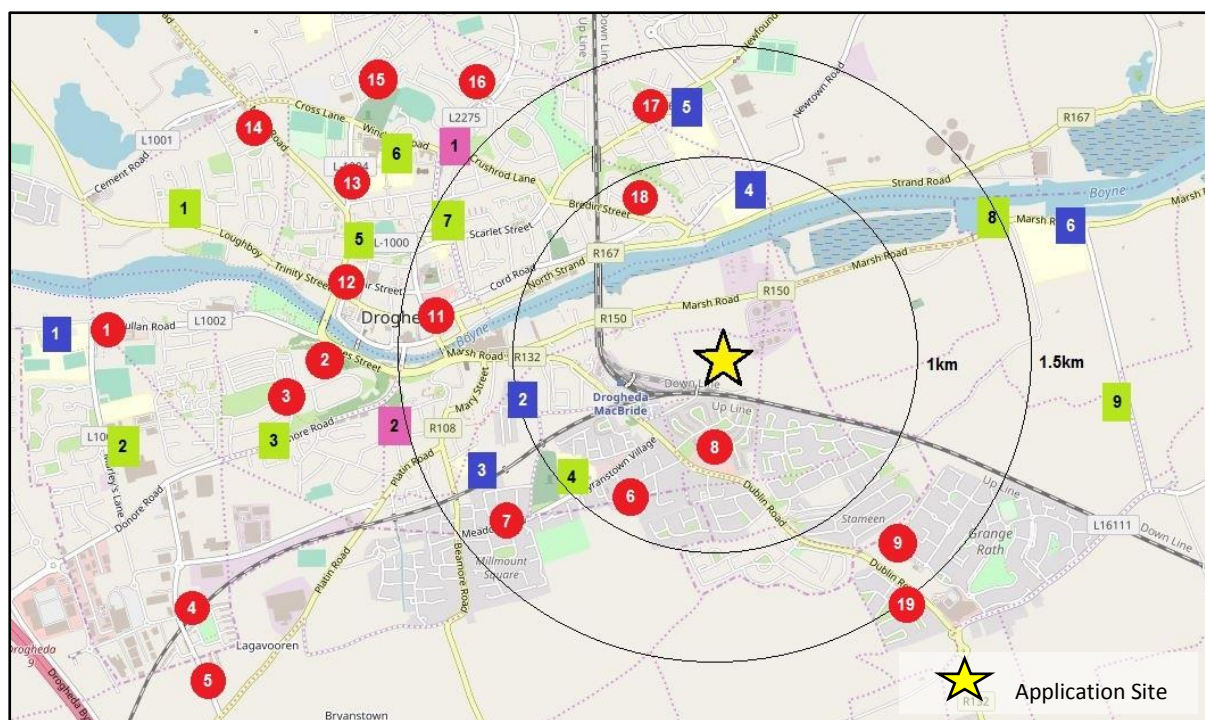


Figure 8—Schools and Childcare Facilities in Surrounding Area

Primary Schools		Post Primary Schools	
St Joseph’s Primary School	1	St Oliver’s Community College	1
St John’s NS and St Paul’s SNS	2	Sacred Heart Secondary School	2
Marymount NS	3	St Mary’s Diocesan School	3
St Mary’s NS	4	Our Lady’s College (Greenhills)	4
St Peter’s NS	5	St Joseph’s Secondary School	5
St Patrick’s NS and St Brigid’s Girls NS	6	Drogheda Grammar School	6
St Joseph’s CBS Primary and Scoil Aonghusa	7	Special Schools	
Le Chéile – Educate Together	8	St Ita’s Special School	1
Gaelscoil an Bhradain Feasa	9	Drogheda ABACAS Special School	2
Childcare Facilities			
Jelly Tots	1	Peter Pan Crèche (2) and Playmates Montessori	11
Lifestyle Community Crèche	2	Drogheda Montessori and Playschool	12
Aunty Paula’s Preschool and Crèche	3	Just Kids Crèche and Montessori	13
Ferndale Crèche and Montessori	4	Little Miracles	14
Scribbles & Giggles Preschool	5	Moneymore Childcare Centre	15
Peter Pan Crèche (1)	6	The Magic Kingdom Playschool and Montessori	16
Daisy Chain Montessori and Little Treasures	7	Tiny Tots Crèche and Absolute Angels Montessori	17
Wheaton Hall Montessori Academy	8	The Maples Montessori	18
The Grange Preschool and Early Years Centre	9	Cuddles Crèche	19
Cute ‘n’ Clever Kids	10		

Table 3— Schools and Childcare Facilities in Surrounding Area

Using 2016 statistics from the Central Statistics Office, it is calculated that the average household size for the Drogheda Settlement was 2.8 persons per household. Applying the household rate to the proposal for 450 residential dwellings results in a population increase of 1,260 persons.

40,956 persons were registered within Drogheda Settlement as part of the 2016 Census, of which approx. 19.8% of the population (8,144) were of school age i.e. 5-18 years. Translating this to the proposal, the estimated population increase of 1,260 persons results in c.250 persons of the future population of school going age.

Using data provided by the Department of Education and Skills on individual schools (Primary Schools and Post Primary Schools 2018-2019, Special Schools 2016-2017) it is possible to establish the current number of students in existing schools in the area.




Primary Schools 	Total No. of Girls	Total No. of Boys	Total Pupils
Le Cheile – Educate Together	182	255	437
St Mary's Parish Primary School	559	544	1103
SN Aonghusa	104	105	209
Scoil na mBraithre SN	-	296	296
SN Naomh Peadar	39	52	91
SN Padraig NAOFA B	-	268	268
SN Bhride C	293	-	293
Gealscoil An Bhradain Feasa	229	219	448
Specialist Schools 	Total No. of Girls	Total No. of Boys	Total Pupils
Drogheda ABACAS Special School	4	26	30
St Ita's Special School	46	90	136
Post Primary Schools 	Total No. of Girls	Total No. of Boys	Total Pupils
Drogheda Grammar School	152	199	351
Sacred Heart Secondary School (Girls)	634	-	634
St Mary's Diocesan School (Boys)	-	845	845
St. Joseph's Secondary School (Boys)	-	789	789
Our Lady's College (Girls)	941	-	941

Table 4 – School Enrolment Figures

Two new schools have been provided in the neighbouring area in recent years. The Le Cheile Educate Together National School new campus opened in 2010. It is a modern 16 classroom school with five special education classrooms and can cater for between 400-500 pupils. The Gaelscoil an Bhradain Feasa (national school) new school encompasses 16 classrooms, learning support rooms, resource rooms, a special needs unit, school hall, soft play area, junior play area and two basketball courts. It can cater for between 400-500 pupils. Both these schools are within 2km of the site.

In terms of secondary schools, Drogheda Grammar School (approx. 2km away) completed an extensive refurbishment program in 2012 comprising three additional classrooms, a library, home economics room, offices, music and technology room. The works doubled the capacity of the school to 350. Furthermore, St. Josephs Secondary School completed refurbishment and extension work in 2015 comprising offices, larger student canteen, additional art room, PE hall, staff room, four practical workshops, two computer rooms, three science labs, library, additional classrooms and pastoral care offices. Additional sporting facilities were also added. Both these schools are within 2km of the site. Sacred Heart Secondary School is planned to be extended to accommodate science laboratories and this project is at design stage as part of the Department of Education Additional Accommodation Scheme. There has also been an additional secondary school approved

for construction in the Laytown area which will serve the application site with capacity for 600 students. Enrolments are being taken for September 2019.

1.4 DESCRIPTION OF SITE

The site takes the form of a broadly rectangular parcel of land which rises up from the Marsh Road from the north to south before widening into a broadly level area. The overall site area extends to approx. 9.68 hectares with a net development area of 7.25 hectares. At present the site is in agricultural use. It does not contain any buildings. There are large ESB pole/pylons and overhead wires that transverse the site



Figure 9 – Looking northwards from site over Drogheda



Figure 10– Temporary Construction Access leading to site of P.A. Ref. No. 17/387

Topography

The site is broadly level towards its southern end, but towards the centre it begins to slope steeply down to the north towards the Marsh Road with ground levels between 33.60m and 21.20m OD Malin within the development area. Thus levels change by approx. 12.4 m running north to south across the site. The ground then drops significantly northwards with Marsh Road at 3.0 OD Malin. This level difference has greatly influenced the design and layout of the proposed development. Whilst it presents challenges it also present enormous opportunities to provide a visually interesting urban backdrop when viewed from several locations within and near the town. Topography further facilitates providing required car parking in undercroft basements resulting in a high quality urban environment not dominated by surface car parking.



Figure 11 – Looking Westward from Site Towards MacBride Train Station



Figure 12– Looking Southwards from Site Towards Foxhill Residential Development on Opposite Side of Rail Line



Figure 13 - McGrath's Lane at Railway Bridge



Figure 14 - Overhead power lines on site to be placed underground

Archaeology

The site contains no Recorded Monuments. Testing, including trenching and geophysical work has been undertaken in response to the submission made by the Department of Culture, Heritage and the Gaeltacht on case ABP Ref. 302215-18 and in preparation of the Environmental Impact Assessment Report that accompanies this planning application. An enclosure has been discovered and it is proposed record and excavate the archaeological feature prior to construction. A licence (19E0433) for this work has been granted by the National Monuments Service.



Figure 15 - View south along Railway Terrace



Figure 16 - Looking South from Marsh Road at approximate entrance to site

Nature Conservation

An Appropriate Assessment Screening Report was produced by Openfield at pre-application stage. The screening assessment states that the application site is not located within, or directly adjacent to any SAC or SPA. However pathways for potential impacts do exist via surface water and treated wastewater to SACs and SPAs in the Boyne Estuary. It was therefore considered necessary to progress to a Stage 2 Appropriate Assessment. This application is accompanied by a Natura Impact Statement prepared by Openfield who have also undertaken the chapter relating to Biodiversity within the EIAR. Provided mitigation measures as proposed are implemented, the proposal will have no significant effects to these areas wither alone or in combination with other plans or projects.

The assessment of biodiversity on site at pre-application stage highlighted the potential for bats to roost and or feed within the application site. For this reason, a bat assessment was undertaken by Mr. B. Keeley B.Sc. (Hons) in Zoo.MCIEEM to consider the potential for bat roosts and foraging on site and to ensure appropriate mitigating measures were provided. This assessment has been incorporated into the assessment of Biodiversity in the accompanying EIAR and has also informed the landscape master plan planting schedule. The Bat Assessment is provided under separate cover.

Site Boundaries

It is proposed to retain existing boundaries where possible and supplement planting where required. A Tree survey and report was also completed at pre-application stage and accompanies this planning application. The tree survey found existing trees on site to be only of fair or poor condition. It is proposed to retain trees along the north western boundary which have been highlighted as having potential for bat roosts. The mitigating measures contained in the Bat Assessment will be applied to ensure the protection and will be incorporated into the landscape masterplan.

1.5 SITE APPRAISAL AND CONTEXTUAL ANALYSIS

Section 3.4 of *Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities (2009)* strongly advocates undertaking a thorough assessment of site context as a starting point in the design process for any new development.

In keeping with national guidelines, an integral part of the design process has involved a thorough contextual analysis of the receiving environment.

The analysis identifies and considers key landscape components, features and characteristics both natural and manmade in addition to existing and proposed land uses. These are depicted in the architects design statement under separate cover by PCOT Architects.

As part of the site analysis and prior to considering the layout and built form, a series of baseline studies were undertaken by appropriate experts. These baseline studies include:

- Topographical surveys
- Consequence assessment / risk modelling² of the Flogas site nearby which is a Seveso site.
- Appropriate assessment screening
- Archaeological assessment
- Landscape and Visual assessment
- Tree survey
- Opportunities for connectivity

² Undertaken in accordance with completed in accordance with the Policy and Approach of the Health and Safety Authority to COMAH Risk-based Land-use Planning, 2010

Topography

The most distinctive feature of the site is its topography and the sharp fall in levels that occurs between the northern and southern boundaries. Broadly, there is a level difference of some 12m between the northern and southern parts of the site. Lands north of the site slope steeply towards Marsh Road with an approximate level of 3.3m OD Malin, representing a 30m drop from the highest point within the site to the Marsh Road.

Views and Vistas

A landscape and visual assessment of the proposed development has been undertaken and accompanies this application under separate cover. Key viewing areas into the site are identified and assessed with regard to the potential impact of the proposed development and verified photomontages produced to illustrate the position in the 'no-development' and 'with-development' scenarios. A key consideration in terms of views and vistas is the zoning of the site and the balance that needs to be achieved between density, proximity to public transport and the town centre and development form and typology.

Scenic Route 19 Baltray – Queensbrough – Beaulieu (Baltray Road on north side of the river) as identified in the Louth County development Plan 2015-2021 is located to the north east of the site along the Boyne Estuary on the north side of the river. It is predicted there will be an imperceptible to slight impact to views from SR 19 and any view of the proposed development will be from a distance of 2km and in the context of the urban backdrop of Drogheda including Tom Roe Point bulk shipping terminal with its large-scale warehouse buildings, the Premier Periglaze facility, the Flogas terminal and the wastewater treatment plant as well as the structures at Drogheda Railway Station itself. Siting south of the river and south of the Marsh Road, the application site does not sit into any protected view nor interfere with views of church spires, the viaduct, Millmount, St.Laurences Gate or any of the other iconic structures in the medieval centre of Drogheda.

The Drogheda Borough Council Development Plan 2011-2017 identifies a protected view from Donors Green towards Millmount and the Presbytery to the south View 8 'Views of Millmount and the Presbytery from Donors Green'. Donors Green is located to the north of the proposed development on the north quays. While it is noted that this view is directed towards the west of the proposed site, a photomontage has been prepared and this view assessed as part of the LVIA.

The landscape and visual assessment identifies there are potential landscape and visual impacts as a result of the proposed development. While it is predicted that impacts are significant at places where views are altered from agricultural to residential, the proposed layout for the development allows for retention of sections of existing hedgerow on the site boundaries that contribute to visual screening and reduce potential impacts. In addition, new planting and parkland areas and the reinforcing of boundary planting will also contribute to visual screening to surrounding areas.

Protected Structures

A review of relevant sources including the Drogheda Borough Development Plan 2011-2017 (as extended and varied); Appendix 18 to the Louth County Development Plan 2015-2021; and the National Inventory of Architectural Heritage (NIAH) (www.buildingsofireland.ie) confirms there are no Protected Structures within or in the vicinity of the proposed development site.

Ecology

A review of relevant sources including the National Parks and Wildlife Services (NPWS) Mapviewer; myplan.ie and Appendix 11 of the DBDP, confirms that no part of the application site is affected by ecological designations pNHA, SAC, SPA or otherwise.

The nearest such sites are the River Boyne and River Blackwater SAC located approx. 0.4km north, and the Boyne Estuary SPA located approx. 0.8km to the north-east. Being located within 15km of the application site, Appropriate Assessment Screening has been undertaken followed by a Natural Impact Statement.

Trees and Hedgerows

Trees and hedgerow occur predominantly at the perimeter of the site. None of these hedgerows are affected by Development Plan objectives of designations. A hedgerow survey was undertaken by Aideen Morrissey as part of the Landscape and Visual Assessment at pre-application stage. Three sections of existing boundaries along the perimeter are recommended to be retained (Table 4.4.01). These have been incorporated into the accompanying landscape plan and rationale by Ronan Mac Diarmada & Associates. A tree survey was also completed and it found that existing trees and hedgerows within the site are of fair or poor quality. Trees at the northern end of the site were identified as suitable for bat roosts. The Bat Survey undertaken did not identify any roosts, however it is proposed to retain this group of trees and follow recommended mitigation measures.

1.6 THE PROPOSED DEVELOPMENT

The application site extends to 9.68 hectares and includes lands for the construction of a LIHAF Road from Marsh Road (R150), required works to Marsh Road and the area of McGrath's Lane/Railway Terrace from the main body of the application site as far as the Dublin Road (R132) as well as the main development area (7.25 hectares).

To ensure the development proposed is not dependent on the implementation of other permissions, the LIHAF Road is included as part of this SHD application. This means the development can be undertaken independent of other proposed development. Necessary consent letters have been provided by Louth County Council and are included in the SHD application documentation.

For the purpose of calculating the residential density of the development and quantum of open space provided, McGrath's Lane/Railway Terrace and the area of the LIHAF Road (including any embankments), are excluded to provide a net development area of 7.25hectares. The crèche building and office building are included in the net development area calculation.

The proposed development is a strategic residential development with supporting neighbourhood and employment uses comprising:

- 81 houses
- 369 apartments & duplex units
- 1,278m² of neighbourhood uses - café/restaurant, local shop
- 1.902.8m² of offices, and,
- Crèche (191.8m²)

Proposed buildings on the site will range between 3 – 5 storeys in height. Parking to serve the proposed development will be provided at both surface level and by way of undercroft/basement parking with 38% of the overall car parking provided by way of basement/undercroft parking. Public open spaces will be provided throughout the development. Two vehicular access points will connect to the access roadway permitted under P.A. Ref. 17/387, and which is the same roadway for which LIHAF funding exists.

1.6.1 ACCOMMODATION BREAKDOWN

The proposed development has a combined gross floor area (GFA) of 44,742.7m², which can be broken down as follows:

- 450 No. residential units GFA 40,642.3m²
- Non Residential GFA 4,100.4m² (9% of Total GFA)
 - Total GFA 44,742.7m²

The following sections set out more information on the land uses and key elements proposed in the planning application.

Residential

No specific housing mix is required under within the Drogheda Borough Development Plan 2011-2017. Policy HC3 aims to “Secure greater social integration, and community ties through the provision of an appropriate mix of house types within residential areas”, although the policy is not prescriptive about mix. Nonetheless the proposed development provides a mix of dwelling types to include terraced (81 No.), duplex apartments (24 No.), and apartment units (345 No.). The breakdown across the 450no. dwellings is- 91 No. 1-bed units, 276 No. 2-bed units and 83 No. 3-bed units. This mix avoids the creation of a homogenous residential development. Rather the mix enables the creation of a more diverse population profile that assists the development of an integrated community. Households can move within the development as families expand and contract.

Unit Type	Number of Units	Percentage of Development
Apartment	345	77%
Duplex Apartment	24	5%
Terrace Houses	81	18%
<i>Total</i>	450	100%

Table 5- Breakdown of Residential Accommodation Type

Proposed Mix of Residential Units		
1-Bed	91	20%
2-Bed	276	61%
3-Bed	83	19%

Table 6 – Proposed Development – Mix of Dwelling Size

House type A (52no.) are terraced/semidetached three storey houses containing three bedrooms while House Type A1 (29no) are all three storey and terraced housing containing two bedrooms There are seven types of apartments as well as duplex type apartments (Type B1 & B2) as detailed in the Architects Schedule that accompanies the application package and summarised by Table 7 of this Statement.

Apartment Type	Quantity Proposed	No. Of Bedrooms
Type B1	12	2-Bed
Type B2	12	3-Bed
Type C	72	2-Bed
Type D	72	2-Bed
Type E	72	1-Bed
Type F/F1	72	2-Bed
Type G	19	1-Bed
Type H	19	3-Bed
Type J	19	2-Bed

Table 7 – Apartment Types

Considered separately from the terraced housing, apartments within the proposed development have an overall mix as follows-

1-Bed	91	25%
2-Bed	247	67%
3-Bed	31	8%

Table 8 – Apartment Mix

Neighbourhood and Employment Floorspace

4,100.4m² of neighbourhood/employment floorspace will be provided for in the development. Flexible use for this floor space is proposed as end-tenants have yet to be identified and it is desirable that the floorspace be adaptable and able to respond to market demands. It is envisaged that the floorspace could provide for such uses as neighbourhood small scale retail, office, crèche, leisure, and café use for example. Potential retail uses can comply with necessary development management standards such as:

- Policy ED10 of Drogheda Borough Development Plan which sets out that a maximum net retail floor area of 500m² shall be permitted for new neighbourhood centres (this applies to a number of smaller units or a single larger unit).
- Policy ED11 which states that a single convenience local shop shall not exceed 200m² of net retail floorspace and only one such outlet shall be permitted.

The above limitations are specified and adhered to within the application.

Public Open Space Provision

The layout and design of the development including the positioning and distribution of open space has evolved from the desire of the applicant to provide a high quality open space hierarchy whilst ensuring boundary hedgerows are protected and retained where possible. Trees and hedgerows were all evaluated from both the ecological and landscape perspectives and those of value are retained and enhanced. The proposed development will result in c.600 new trees being planted as well as native woodland planting and hedgerows. It is intended that the public open spaces proposed will provide identity and a sense of place for future residents as well as encouraging a more active lifestyle by offering a variety of safe and attractive spaces distributed throughout the new neighbourhood.

The site provides a hierarchy of public open spaces with of four primary public open space areas proposed including a hard surfaced urban plazas at the neighbourhood area at the south and employment buildings at the north of the site linking the spine like pedestrian route though the site. A large central green is provided as well as a natural playground. Smaller pocket parks and communal areas with seating have been allocated to the apartments which will function as passive spaces. In total, 18% of the site area is designated as public open space. The calculation of open space does not include ancillary areas or the areas of green space associated with the LIHAF Road such as the LIHAF Road embankments. When communal open space associated with the apartments is included, this figure rises to 22% of the site area.

All public open spaces have been designed by an appropriately qualified and experienced landscape architect as an integral part of the site layout. A Landscape Rationale by RMDA accompanies this SHD application under separate cover which includes the detailed design rationale behind the creation of each of the primary open spaces as well as detailed design elements such as car parking and bin storage areas. It is submitted that the Central Green and Natural Playground are adequately sized for the proposed development and are well connected and supervised to encourage their use. The Landscape Masterplan drawing is accompanied by a planting plan and specifications, a Hardscape Plan as well as a boundary treatment plan.



Figure 17 – Extract from the Landscape Masterplan by RMDA

Car Parking

A rationale for the car parking proposed is contained within the TTA and Mobility Management Plan by Waterman Moylan under separate cover and takes account of the guidance contained within the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) and comments of An Bord Pleanála in their Written Opinion.

The unique topography of the site has been utilised to provide 38% of all car parking below ground level reducing the overall impact of the quantity of car parking and enabling a high level of public open space to be provided. It is submitted that the distribution of car parking on site together with the site layout will encourage more sustainable modes of transport use over the private car.

Car Parking Allocation and Location		On Curtilage	On Street	Underground/Undercroft
Parking for Housing		162		
			11	
Parking for Duplex Units			27	
Parking for Apartments	Block 1		13	30
	Block 2		13	30
	Block 3		13	30
	Block 4		13	30
	Block 5		17	26*
	Block 6		43	
	Block 7		19	24*
	Block 8		5	17*
	Block 9		34	
	Block 10		34	
Parking for Neighbourhood Uses	Block 9 & 10		44	
Parking for Offices				40*
Parking for Crèche			10	22*
Visitor Parking				33*
Sub-Total		162	296	282
Total Car Parking Proposed				740

*Underground car parking refers to the three level car park beneath the office and crèche building accessed directly from the LIHAF Road.

Table 9 – Car Parking Breakdown

Car parking at surface level is proposed both in curtilage for the proposed housing and on street for the apartments and duplex units. A car parking allocated drawing accompanies this planning application (PL06). Whilst the specific allocation of car parking spaces for the apartments will be decided by the Management Company in due course, the car parking allocation plan illustrates how the applicant has addressed the overall car parking for occupiers of the apartments while giving due regard to the pattern of demand for travel that is likely to arise from the occupation of the proposed development, as well as to the likely demand from households to have access to private transport even where it does not provide the primary mode for travel to work or school.

Provision has been made for Electric Vehicle Charging Points/Parking spaces and parking for those who are mobility impaired. As detailed in the Landscape Rationale by RMDA, the car parking has been integrated into the landscape plan with hard landscaping defining pedestrian priority zones and planting softening communal parking areas. All parking areas are overlooked.

Cycle parking is provided throughout the site as illustrated by architect drawing PL-06. A total of 853 cycle parking spaces are provided including 460 at surface level that are conveniently placed to encourage use and security and in proximity to the cycle path network.

Improvement Works to McGrath's Lane and Railway Terrace

The proposed improvement works are illustrated by Waterman Moylan Consulting Engineers Drawings 16-137-P150 and 16-137-P151. There is no vehicular access proposed to or from the application site via McGrath's Lane/Railway Terrace. It is proposed to widen McGrath's Lane from its current width of 2.75metres to a shared surface with a width of c.5.8metres. The shared surface will consist of a 1.8metres pedestrian strip and 4 meter carriageway with appropriate signing and linage provided. The existing footpath on Railway Terrace is proposed to be widened from 1.8metres to a minimum of 2metres. Where the road carriageway reduces in width below 5metres, yield signage and marking will be provided. Due to the low traffic volumes and speed anticipated it is considered appropriate to keep cyclists on road at this section. Public lighting will be provided along the length of McGrath's Lane/Railway Terrace from the main body of the development site to the junction with the Dublin Road (R132).

1.7 PART V OF THE PLANNING AND DEVELOPMENTS ACT 2000 AS AMENDED

According to Article 297 (2) (g), in the case of a Strategic Housing Development to which section 96 of the Planning and Development Act 2000 applies, details as to how the applicant proposes to comply referred to in subsection (2) of that section to which the permission, if granted, would be subject.

With reference to the Department of Environment, Community and Local Government Circular PL10/2015 dated 30th of November 2015, the following information is provided by the applicant in support of the application:

- Details of Housing to be transferred and compliance with Article 22 (2)(e)(i) – Please find enclosed with the application package architect Dwg. No. PL-07 which identifies and provides details on the housing units it is proposed to transfer.
- Financial aspects and compliance with Article 22(2)(e)(ii) – Enclosed with the application package is a breakdown of the total development costs for. units it is proposed to transfer

A Letter from Cluid demonstrating their interest in acquiring the units proposed under Part V together with the required calculations.

2.0 CONSISTENCY WITH LOCAL PLANNING POLICY

The statutory Development Plan affecting the site is the Louth County Development Plan 2015-2021 and the Drogheda Borough Development Plan 2011-2017 (as extended and varied). The Following section of this Statement demonstrates how the proposed development is consistent with the policies of these Plans.

2.1 CONSISTENCY WITH THE LOUTH COUNTY DEVELOPMENT PLAN 2015-2021

2.1.1 CORE PRINCIPLES

The Louth County Development Plan 2015-2021 is an over-arching Development Plan for the entire county including Drogheda. The following strategic aims of the Plan are met by the proposed development-

- *Prioritise sustainable development at appropriate locations within the towns of Dundalk and Drogheda as economic drivers for the County,*
- *Encourage mixed use development forms and sustainable centres, in which employment, housing and community services are located in close proximity to each other and to strategic public transport corridors,*
- *To support the creation of a compact urban form in all settlements in County Louth,*
- *Ensure that future development patterns accord with sustainable management of water Resources*
- *Facilitate the development of sustainable and socially inclusive communities,*
- *Promote and support the integration of land use and transport and to encourage a modal shift to greater use of sustainable modes of transport, including walking, cycling and public transport,*
- *Consolidate population growth and employment in areas best served by public transport and a range of transport modes (p.11).*

The proposed residential development with commercial elements and crèche is located in direct proximity to Drogheda Train Station. The Drogheda Transportation Development Area in which the site is located is recognised as a strategic development area. The allocation of funding under the LIHAF for the construction of an access road that will serve the proposed development confirms the importance of these lands in terms of providing much needed residential accommodation in Drogheda. Residential is a permitted use under the DTDA zoning objective that affects the application site development area.

As outline at section 1.3 of this statement, while Drogheda has developed in a sequential manner, the subject lands form part of a wedge of undeveloped land within the envelope of the urban area. The development of these lands will further consolidate the urban area of Drogheda and provide critical mass to support services including the adjacent railway. It will also make a significant contribution to National and Regional policy that 30% of new development be by way of “compact growth”.

The proposed layout has allowed for pedestrian and cycle movements to have priority over car movements. The development could facilitate a public service route in the future and provides for pedestrian access to Drogheda Train Station via McGraths Lane/Railway Terrace and Dublin Road. Please see separate reports by Waterman Moylan under separate cover for more details on compliance with DMURS.

2.1.2 SETTLEMENT STRATEGY AND POPULATION DISTRIBUTION

The Louth County Development Plan acknowledges Drogheda's position in the County settlement hierarchy as a Primary Development Centre and Large Growth Town. It is the policy of the Plan-

- *To facilitate the development of Dundalk and Drogheda and to maintain their positions at the top of the settlement hierarchy (SS 2).*
- *To ensure that the expansion of Drogheda to include the Northern Environs, takes place in an orderly and sustainable fashion that will support the growth of Drogheda and not detract from the vitality and viability of its town centre (SS 5).*

The proposed development is in line with County Development Policy with regard to the provision of additional residential units to accommodate predicted population growth in the area. The development area is identified as a strategic development area and is within 1.5m of the town centre and 600 metres of a mainline rail station. Neighbourhood uses and employment uses are provided for as part of the proposed development with neighbourhood uses provided as part of Phase 1 of the proposal. These will serve local needs only and will not detract from the vitality or viability of the town centre in keeping with Plan policy (EDE 36). It is submitted that the creation of a new community close to the existing town centre will provide critical mass necessary to support and grow services within the town.

Table 2.4 of the Plan outlines the distribution of existing and proposed population in the settlement hierarchy and equates the population change to residential unit equivalent. A total of 3,111 are required for the County of Louth is required with 952no. residential units allocated to Drogheda & Northern Environs for the population increase predicted for the period 2016-2021.

Based on the most recent CSO statistics from Statbank (www.cso.ie), there have been 1,354 new dwelling completions in the area of Louth County Council between 2016Q1 and 2019Q1. Unfortunately figures are not available for the individual urban centres within the County, however the figures clearly show that housing completions are falling short of the requirements of the Development Plan. It is also worth noting that 25% of the new dwellings completed are categorised as 'single house' meaning that a quarter of completions were probably not even on the market.

2.1.3 RESIDENTIAL DEVELOPMENT

The policies affecting residential development are contained within Chapter Four of the Development Plan. The Plan requires all proposed developments to be consistent with the guidelines and best practice manuals issued by the DECLG in the planning for and provision of sustainable communities within new residential areas (RES 10).

Section 3 of this Statement details the proposals compliance with Section 28 and Best Practice Guidelines. An Architects Design Statement by PCOT Architects accompanies this application and details the proposals consistency with the Urban Design Manual and Universal Design.

Policy RES 13 is "To encourage developers to provide for a mixture of housing types and sizes thereby creating visual variety and preventing residential developments that are homogenous in character".

The proposal includes a mix of 1, 2 and 3 bedroom houses, duplex and apartments and is compliance with Part V of the Planning and Development Act 2000 as amended.

RES 26 To ensure that a high degree of building flexibility is incorporated into the design of new dwellings within the County including adaptability to lifetime housing needs and provision of accessibility for the elderly and those with impaired mobility.

The mix of apartment and house types proposed provides for flexibility and lifetime housing needs. An Architects Design Statement by PCOT provides details on the high quality design.

The following policies relate to the design of roads and provision of sustainable transport options in residential developments-

- *To encourage the use of homezone design principles in the design of residential layout having regard to the Design Manual for Urban Roads and Streets (DMURS) (RES 14).*
- *To require that master plans and planning applications for residential developments identify where appropriate, pedestrian and cycle paths within the site and externally to adjoining residential areas, existing services and community facilities (RES 15).*
- *To require that master plans and planning applications for large scale residential developments identify where appropriate, bus routes, the location of bus stops and lay-bys in such a manner as to ensure that the majority of residents are no more than 400 metres from a stop (RES 16).*
- *To ensure the provision of safe and viable alternatives to the car for school traffic, in any major planned housing development and in town and village centres (RES 17).*

Waterman Moylan Consulting Engineers (WM) has provided an assessment of the proposal against the recommendations contained in the DMURS under separate cover. The WM Report concludes the proposed development is DMURS compliant and sets out the reasons why. Pedestrians and cyclists are given priority in the layout proposed. There is an existing bus route on the Marsh Road that could be extended to serve the proposed development. The site is in direct proximity to Drogheda Train Station and provides for a pedestrian link to the Dublin Road via McGraths lane/Railway Terrace where the largest primary school in Drogheda is located.

In addition, the development is laid out in such a way as to facilitate future vehicular and pedestrian access in a western direction to the railway station. This is in compliance with masterplan principles and also the Regional Spatial and Economic Strategy with respect to accessibility to McBride Train Station. The 'Enabling Infrastructure' section on Drogheda states, "The existing McBride Rail Station will continue to be the main public transport hub for Drogheda and its environs. However, accessibility to the station will need to be improved, including access to the undeveloped lands to the east of the station, and stronger linkage should be forged between rail and bus services in the town" (RSES, p.59).

2.1.4 TRANSPORT

It is the policy of the Plan-

- *To promote land use planning measures which aim for co-ordination and integration between land use and transport throughout the County, thereby maximising the potential of the County's transportation network and encouraging travel by public transport, walking and cycling (TC 3)*

- *To adhere to the principles contained within the guidance document, Design Manual for Urban Roads and Streets (2013) Department of Transport, Tourism and Sport (DTTS)/ Department of the Environment, Community and Local Government (DECLG) TC 6.*
- *To ensure that bus routes and adequate services are provided within all new proposals for substantial residential developments (TC 38) .*

The proposed development is in within 600m walking distance of Drogheda Train Station via McGraths Lane. The proposal has been designed to give priority to pedestrians and cyclist's. There is a local bus service on the Marsh Road which could be extended to the proposed development in the future. Further information on the proposals compliance with DMURS is provided under separate cover by Waterman Moylan. The proposal also future proofs pedestrian cyclist and vehicular access from the application site and zoned lands east of the railway station where there is future potential to provide access to the station from the north side of the tracks.

Car parking standards are contained within Table 7.6 of the Plan. Please see Section 5.4 of the Engineering Assessment Report and Mobility Management Plan by Waterman Moylan for the proposals compliance with car parking provision. It is submitted the level of car parking proposed is in keeping with the site's proximity to the Drogheda Train Station and Town Centre and takes account that while the car may not be the primary mode of transport to school or work, that there may still be a demand for private transport by future residents as advised by An Bord Pleanála in their Notice of Opinion.

2.1.5 SEVESO CONSULTATION & WATER SERVICES

The SEVESO sites in County Louth are identified in Table 8.2 of the Plan and including the advised consultation distances (with the HSA) to be applied in respect of these sites. It is a policy of the Plan *"To comply with the SEVESO II Directive in reducing the risk and limiting the potential consequences of major industrial accidents"* (ENV 24).

The development site is located in proximity to an identified SEVESO site consultation zone on the Marsh Road. AWN Consulting have prepared a report in accordance with the Policy and Approach of the Health and Safety Authority to COMAH Risk-based Land-use Planning, 2010. This report concludes that on the basis of both individual and societal risk, the development proposed is acceptable and that in the event of an LPG BLEVE at the Flogas Terminal, it would not result in any fatalities at the proposed development site. A submission by the Health and Safety Authority on the applicant's pre-application submission had no objection to the proposed development. This report forms part of the EIAR (Chapter 4).

It is the policy of the Plan-

- *To require that all permitted development taking place within an area served by a public wastewater treatment system connects to that system (ENV 17).*
- *To ensure that the incorporation of Sustainable Urban Drainage Systems (SuDS) measures in all developments is mandatory (WS 10).*
- *To ensure that all discharges shall be attenuated to green field levels whereby both flow rate and volume of discharge of runoff from developments to receiving waters shall mimic in so far as possible pre-development levels (WS 11).*
- *To ensure that all new development shall incorporate appropriate measures to protect existing water bodies through appropriate treatment of runoff. In particular discharges from car parks shall be appropriately treated so as to remove pollutant materials (WS 13).*
- *To ensure that all new developments shall be provided with separated drainage systems (WS 14).*

The proposed development will connect to the public wastewater system. Irish water have confirmed there is capacity for the development as proposed. An Engineering Assessment Report by Waterman Moylan details the proposals compliance with the above policies.

2.1.6 DEVELOPMENT MANAGEMENT

Whilst a Development Plan is currently in place Drogheda, following the adoption of the Louth County Development Plan 2015-2021, it is intended that the existing development plan for Drogheda be reviewed and ultimately replaced by a Local Area Plan which will be a sub set of and consistent with the provisions of the Louth County Development Plan 2015-2021. The Louth Plan states that while guidelines are provided with regard to residential densities for settlements with a population of less than 5,000, further refinement is necessary under the new Local Area Plans (RES 18).

Public Open Space

Public open space standards are contained in Table 4.4 and sets the minimum requirement at 15% of the gross site area.

Public and communal open spaces within the proposed development amount to 22% of the net site area. This includes high quality public spaces designed by a qualified landscape architect. The LIHAF Road area and McGrath's Lane/Railway Terrace have been discounted from the calculation of gross site. This approach is consistent with National Guidelines Sustainable Residential Development in Urban Areas (2009).

Internal Space Standards for Residential Development

RES 25 To require that all proposed residential developments including apartments comply with the internal space provisions as set out in Tables 4.5 to 4.8 (inclusive).

Houses comply with the standard set by the Development Plan which follows the targets outlined by Quality housing for Sustainable Communities (2007). The proposed apartments meet with the latest internal space standards as detailed in the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2018).

Private Open Space

RES 27 To require that private amenity space is in accordance with the quantitative standards as set out in Table 4.9.

Table 4.9 of the LCDP requires housing proposed on Greenfield sites to have a minimum standard of 60m² in the case of two bedroom houses and 80m² for houses with three or more bedrooms. The proposed development meets this standard.

Separation Distance

RES 28 To provide at least 22m between windows of habitable rooms above ground floor level which face those of another dwelling.

Separation distances are indicated on the site layout drawing that accompanies this planning application. All dwellings meet with the minimum separation distance for habitable rooms above ground floor level which face those of another dwelling.

Energy Efficiency

RES 30 To require all applications for residential development including one off houses to demonstrate that a minimum of 25% of the energy requirements of the building is from renewable sources.

All dwellings will meet with relevant Buildings regulations. Please refer to Section 3 of the Building Lifecycle Report provided under separate cover for further details.

Waste Management

RES 31 To ensure that provision is made for the storage, segregation and recycling of waste and for convenient access for its deposit and collection

RES 32 To ensure that refuse enclosures are designed in such a manner as to ensure their integration with the associated building or boundary enclosure and should be appropriately and adequately screened

Please refer to architects drawings PL-102 for details of bin storage areas which are indicated on the site layout drawing PL-01. Bin storage areas have been integrated into the Landscape Plan prepared by Ronan Mac Diarmada Associates Landscape Architects which is accompanied by a Landscape Rational providing additional detail on the location and design of bin storage.

Car Parking

The application site would be considered as Area 2 as defined at Section 7.3.9.1 “Lands located adjacent to high level public transport services or lands serving local catchment area” due to the site’s location within walking distance of Drogheda Train Station and bus services on the Marsh Road and Dublin Road.

The requirements with regard to car parking provision differ between the Louth County Development Plan standard as outlined at Table 7.6 and the Drogheda Borough Council Development Plan 2011-2017 (as varied and extended). While the LCDP is more recently adopted, it requires a higher level of car parking provision than the DBCDP. The car parking provided follows the requirement outlined by Table 5.4 of the DBCDP as it is considered to strike a better balance between the requirement to provide car parking for residents and the ethos of an integrated land use objective that encourages mores sustainable modes of transport. This SHD application is accompanied by a Mobility Management Plan by Waterman Moylan Consulting Engineers.

2.2 CONSISTENCY WITH THE DROGHEDA BOROUGH DEVELOPMENT PLAN 2011-2017

2.2.1 CORE STRATEGY

The Drogheda and Northern Environs Core Strategy was introduced to the Drogheda Borough Council Development Plan in 2011 by way of variation No. 1 to the Borough Plan. Essentially, the Core Strategy sets out how the Planning Authority will apply the sequential approach to residential development by setting out an order of priority or phased release of residential development land. Lands in the Borough are designated Phase 1 Residential and Phase 2 Residential. Policy CS2 of the Strategy states that only on completion of the development of 75% of Phase 1 lands will sites in Phase 2 be considered for additional residential development.

Section 2.8 of the Core Strategy deals with the DTDA and states – *“The DTDA lands are zoned for mixed use and can accommodate residential development. A Master Plan is to be produced in conjunction with Meath County Council and major infrastructural works are required. It is anticipated that it will be a number of plan cycles before these lands come in stream therefore these lands are not included in the overall land availability figure”*.

Census 2016 results show that Drogheda has maintained its position as the largest town in the State with 40,956 persons. As recognised by the RSES, Drogheda has also been the fastest growing town during the inter census period 2011-2016. Statistics also show that there has been an increase of 6,107 persons living in urban areas in Louth since the previous Census in 2011. Since September 2017, Drogheda has been designated a Rent Pressure Zone. It is clear from the new dwelling completion figures for the County (section 2.1.2 above) that the required residential units have not been delivered. The National Framework Plan identifies Drogheda as a Growth Centre and highlights the strategic importance of the Dublin-Belfast Corridor. The recently adopted Regional Spatial and Economic Strategy aims to grow Drogheda to City Status with a population of at least 50,000, clearly demonstrates that there will be an ongoing demand for new housing.

Given the DTDA land is not included in the overall land availability figure, it is considered that development on the lands can proceed outside of the Core Strategy phasing allocations. In terms of national policy on sustainable development and the application of the sequential principles to the development of urban areas, it makes little sense to have such a large area of zoned and serviced lands in proximity to the railway station, the town centre and other community and amenity facilities and not have it prioritised for development. It is submitted that the proposed development will contribute to the achievement of Development Plan housing targets that have not been achieved to date, on a site that is zoned for development and contiguous to the built-up area of Drogheda. It is also submitted that to wait for the adoption of the new Joint Urban Area Plan as planned under the RSES and any future masterplan would unduly delay necessary housing development at a strategic location in proximity to the Drogheda Train Station where funding is in place under the Local Infrastructure Housing Activation Fund.

2.2.2 LAND USE ZONING

According to the Development Plan Zoning map, the net development area is zoned 'Drogheda Transport Development Area'. Chapter 2 sets out the zoning objective as:

"To protect and expand the existing Transport Hub around the train Station and facilitate the development of Public Transport facilities including Residential, Retail and Office Development".

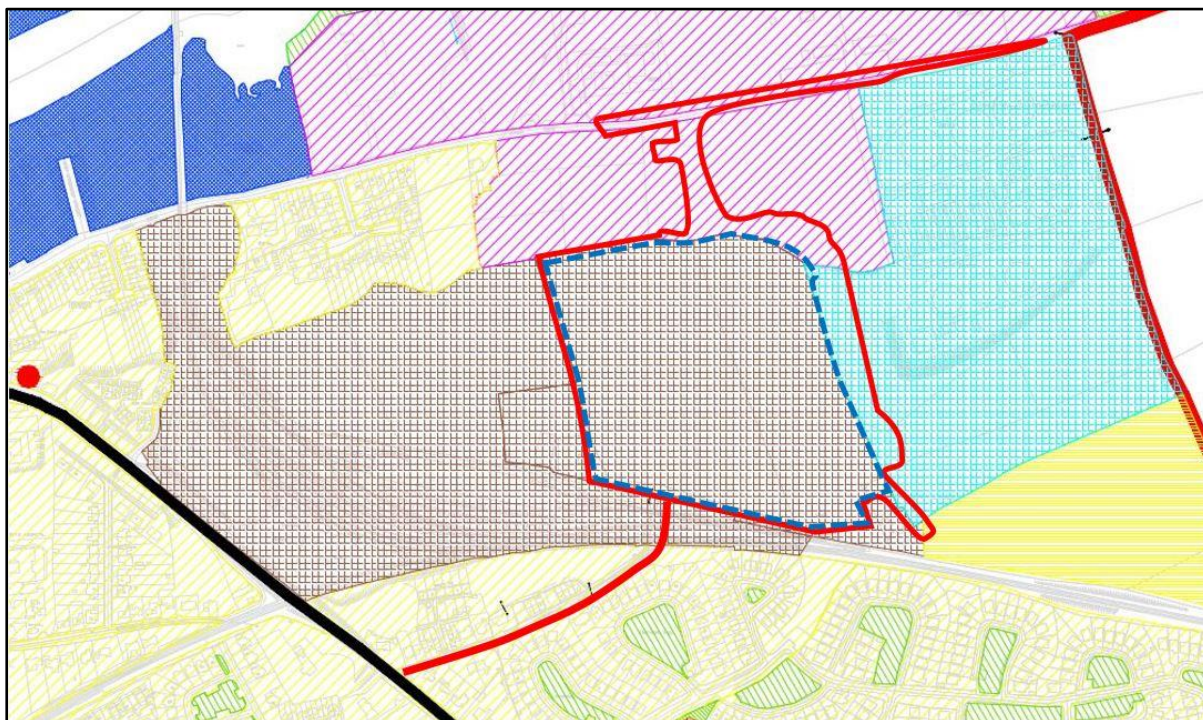


Figure 18 – Extract from Zoning Map Showing the subject site outlined in red and the net development area indicated by a dashed blue line (Approx. Site Boundaries)

Table 2.2 of the Drogheda Development Plan contains a Development Management Zoning Matrix. Land uses including 'residential', 'crèche/childcare facility', 'shop-local', 'shop-major', 'restaurant/café', and 'office' are permitted uses in this zone.

2.2.3 PLANNING POLICY

Vision and Strategic Objectives

Chapter 1 of the Development Plan sets out the vision for Drogheda which is:

"To promote Drogheda as the principal urban centre between the Greater Dublin and Border regions and as a key settlement along the eastern corridor, an inclusive flourishing urban community providing a high quality built and natural environment attractive to residents, visitors and investors alike".

10 strategic objectives are set out to achieve this vision. ***It is considered the proposed development fully accords with the vision and strategic objectives for Drogheda as follows.***

Strategic Objective 1: To provide the highest quality living environment possible for all the citizens of Drogheda by ensuring that the Borough will evolve in a sustainable, dynamic and environmentally sensitive manner thus enhancing its pivotal role along the Eastern Corridor and with due regard for its distinguished history.

The proposed development fully accords with this objective in its location, adjacent to the Drogheda Train Station, on lands contiguous to the built up area and in its design, which has been undertaken by qualified architects in compliance with DMURS and fully assessed in terms of potential environmental impacts.

Strategic Objective 2: To implement a settlement strategy which will guide new development within the plan area in accordance with the principles of sustainable development in order that Drogheda may continue to contribute to the building of critical mass along the Eastern Corridor.

The proposed development will support Drogheda as a designated growth centre on the Strategic Dublin Belfast Corridor. The additional population within this new neighbourhood located in close proximity to the train station will provide additional critical mass and make the best use of plans to extend the DART to Drogheda in addition to the frequent heavy rail services.

Strategic Objective 3: To create and facilitate sustainable economic development and growth in Drogheda so that it may continue to flourish in tandem with other key centres thereby strengthening its position on the central portion of the Eastern Corridor.

The proposed residential development is supported by employment uses with lands to the north zoned for future employment uses.

Strategic Objective 4: Enhance the established role of Drogheda Town Centre as the retail, social and transport focus of the entire Borough and pro-actively position the town centre as a destination of choice for both visitors and residents alike with a special emphasis on the role played by the town walls.

The application site is close to the town centre of Drogheda. The proposed neighbourhood uses will be for local services such as a local shop, hairdresser or café and will not compete with the retail focus of the traditional town core.

Strategic Objective 5: Provide a sustainable transportation system for Drogheda to secure the successful integration of land use and for the convenience of the public.

It is submitted that the proposed development is an example of sustainable integrated land. The proposal includes a pedestrian link from the application site along McGrath's Lane and Railway Terrace to Dublin Road and its associated bus services. The development has been designed to prioritize pedestrians and cyclists making sustainable modes of transport the most convenient method for local journeys. The proposed development also provides critical mass within walking distance of the Drogheda Train Station to support existing and planned rail services.

Strategic Objective 6: Ensure the provision of socially inclusive residential communities supported by the provision of high quality dwelling units and community facilities.

The proposed development includes a variety of dwelling types and sizes to suit all life stages. All dwellings are designed to a high standard by a qualified and experienced team of architects PCOT and exceed Best Practice Guidelines as demonstrated at Section 3 of this Statement. There is a high level of public open space provided throughout the site that has been designed by Landscape Architects Ronan Mac Diarmada & Associates which will encourage futures residents to make use of these spaces. Neighbourhood uses will create a centre to the development with employment uses supported by a childcare facility.

Strategic Objective 7: Protect and enhance existing recreation and amenity facilities within the Borough and secure the provision of additional facilities subject to demand and availability of land and resources.

The proposed development includes high quality public open spaces including a Natural Playground. As illustrated by Figure 6 of this Statement, the site is in proximity to a number of existing recreation and amenity facilities including sports grounds, pitch and putt and the town centre.

Strategic Objective 8: Protect and enhance the natural and built environment as an inherent part of the heritage of the Drogheda Borough Council Plan area.

This SHD application is accompanied by an EIAR and NIS. The landscape plan retains existing hedgerows and tress where possible and proposed planting is pollinator friendly. There are no protected structures on site or in proximity to the site nor is it located within an Architectural Conservation Area. The Landscape and Visual Impact Assessment has taken account of Strategic Views as contained in the Development Plan. The application site is outside the town walls and beyond the viaduct sitting to the side of townscape views. It is submitted that the proposed development would not harm the natural environment or built heritage of Drogheda.

Strategic Objective 9: Provide a framework for sustainable energy use in development and facilitate the provision of high quality telecommunications infrastructure.

All dwellings have provision for solar panels on the roof. All buildings will be compliant with most recent Building Regulations in relation to energy efficiency. It is submitted the site location, contiguous to the built up area of Drogheda on zoned serviceable lands in proximity to the Drogheda Train Station makes for sustainable energy use as the priority will be to walk/cycle rather than using the private car.

Strategic Objective 10: Secure a high quality, clean and healthy environment while facilitating the sustainable development of Drogheda Borough through the continued improvement of infrastructure, including water, drainage, and waste management facilities.

The proposed development includes the provision of an access road permitted under 17-387 that will be funded under the Local Infrastructure Housing Activation Fund. Irish Water have confirmed that capacity exists in terms of water supply and waste water disposal for the proposal and have accepted the proposed design (please see Engineers Report by Waterman Moylan Consulting Engineers for further information and correspondence). This SHD application is accompanied by a Construction and Operation Waste Management Plan as part of the EIAR submitted and has been designed incorporating Sustainable Urban Drainage Systems. There will be a high percentage of public open space including a children's Natural Playground.

Character Areas

Chapter 2 of the Development Plan sets out character areas for the Borough. The application lands are located within the 'Bryanstown' character area. The objectives for this character area are as follows:

- *"Provide for new residential development and supporting community facilities and to facilitate seamless, sustainable expansion into the adjacent southern environs.*
- *To consolidate the existing residential development including support for additional community facilities and infrastructures".*

It is also Policy DS2 *"To explore the feasibility of preparing an Urban Design Framework Plan for the Drogheda Transport Development Area and adjacent areas of County Meath"*.

It is considered the proposed development fully accords with the Bryanstown Character Area objectives. With regards to the preparation of an urban design framework plan, Policy DS2 does not require such a framework plan prior to the DTDA being developed. It should be noted the DTDA lands extend well-beyond the applicant's landholding. Such a plan has been mooted for this area since 2005 with no steps taken towards exploring its preparation over the past 14 years. The application lands occupy only a proportion of DTDA lands and the development has been designed so that it can connect with potential future development on neighbouring land. It is further noted that application Ref. No. 17/387 was permitted without it being required to have a framework plan in place.

Environment Hazard Zones

Para. 2.10 of the Development Plan deals with environmental hazard zones. The application site is within approximately 600m of a notified site³. Policy DS 6 of the Development Plan requires that the Health and Safety Authority be consulted with respect to any development proposals within these consultation zones. At the inception stages of the project, the applicant commissioned a report into the potential for issues arising out of proximity to the Flogas Terminal which is a Seveso site. A report was prepared by AWN Consulting outlining risk contours based on consequence assessment and risk modelling of an LPG BLEVE event at the Flogas site. The Assessment was undertaken in accordance with the Policy and Approach of the *Health and Safety Authority to COMAH Risk-based Land-use Planning, 2010*. The assessment did not reveal any

³ Whilst The DBDP, and the Meath County Development Plan, refer to two Seveso zones (Flogas and Maxol), the Maxol site is no longer in operation and thus only one Seveso site is nearby.

impediment to the development proceeding to design / planning stage. A submission by Health and Safety Authority on pre-application submission has no objection to the location of residential development on the application site.

Local Shops

Para. 3.3.6 states that Drogheda Borough Council will promote the development of new neighbourhood centres where there is a clearly demonstrated need to serve new or expanding residential areas with basic facilities, such as local convenience shopping and community facilities. A maximum net retail floor area of 500m² is permitted (either in one unit or by a number of smaller units combined). The proposed development can adhere to restrictions on retail size. The neighbourhood floorspace proposed in the development is intended to cater for a variety of uses such as retail, office, crèche, leisure, and café/restaurant use for example. These uses will be small scale to serve only the immediate neighbourhood.

Drogheda Transport Development Area

Section 5.3 of the Development Plan specifically deals with the Drogheda Transport Development Area (DTDA). Acceptable land uses within the DTDA are stated to include: high density housing development, neighbourhood scaled community services and amenities including appropriately scaled retail provision, and mixed use development including retail and high value added enterprise developments. Six general principles are set out for the DTDA and include:

- “1. Development Proposals must prioritise access arrangements other than by private car and should therefore demonstratively contribute to the DTDA sustainable transportation aims.*
- 2. Mixed Use Developments with significant residential elements will be considered within or adjacent to the DTDA Areas.*
- 3. Higher Residential Densities will normally be permitted within the DTDA Areas.*
- 4. Developments incorporating “Live / Work” principles will be encouraged.*
- 5. All Development Proposals must be of a High Qualitative Nature.*
- 6. Priority must be given to the requirements of Pedestrians, Cyclists and those with Restricted Mobility in the design and layout of the Development”*

The proposed development is considered in compliance with the above principles as follows:

- The entire development is designed to DMURS standards which seek to give greater priority to pedestrians and cyclists. A statement of compliance with DMURS by Waterman Moylan Engineering Consultants is submitted as part of this pre-application request under separate cover.**
- The development is mixed use with a significant high density residential element.**
- The development will provide for a high and sustainable residential density of approx. 62 units/hectare.**
- Buildings 9 and 10 include ground floor neighbourhood use floorspace.**
- A Design Statement by PCOT Architects and Landscape Plan by Ronan MacDiarmada & Associates are submitted to accompany the application. These demonstrate the high quality nature of the development.**

Following on from these principles is Policy TR9 which states:

“To implement the general principles outlined above associated with the Drogheda Transport Development Area. To explore the feasibility in conjunction with Meath County Council, to producing a Master Plan for those lands east of McBride Station bounded to the south by the rail line, to the north by the River Boyne and to the east by the Borough boundary”.

The proposed development has been purposely designed so that it can connect with potential future development on neighbouring land east and west including future pedestrian/cycle and vehicular links to the northern side of the railway station. As outlined above, the application site occupies only a proportion of the DTDA Lands. Over the past 14 years there has been no move to prepare a master plan. It is further noted that application Ref. No. 17/387 was permitted without it being required to have a masterplan in place.

Transportation

It is noted that there is inconsistency within the DBCDP with regard to the strategic roads objective contained within Section 5.7 which includes, 'Bryanstown Cross Route Extension to the East', and the removal of Objective RT1 during the preparation of the Development Plan. However, it is clear from reading the Report on Proposed Material Alterations to the Draft Drogheda Borough Council Development Plan 2011-2017 that this objective was specifically removed at material amendment stage-

Chapter 5 Transportation			
14	TR 1	Removal of RT1: RT1 Bryanstown Cross Route: retain reservation for the Bryanstown Cross Route extending from Mornington Road to Dublin through Stragrennan, Newtown, Bryanstown, Legavoureen, under take road construction work.	p 97

Figure 19 - Extract from the Report on Proposed Material Alterations to the Draft DBCDP 2011-2017

The objective that appears at Section 5.6 of the adopted DBCDP was located in Chapter 3 Economic Development, Retail and Tourism at Section 3.2.4 in the Draft DBCDP. No reservation area is indicated on any map within the adopted DBCDP for the provision of the route as was previously shown in the specific objectives map under the previous DBCDP 2005 for RT1.

This objective was not raised on assessment of P.A. Ref. 17/387 which granted planning permission to the main access road from the application site north to Marsh Road. This matter was raised by a Road's Engineer of Louth County Council at the tripartite meeting. The matter is not raised in the Board's Notice of Opinion.

Housing

Policy HC3 of the Development Plan states: "Secure greater social integration, and community ties through the provision of an appropriate mix of house types within residential areas".

Policy HC8 states: "Implement the guidelines and best practice manuals issued by the Department of Environment, Heritage and Local Government as contained in the policy documents Urban Design Manual - A Best Practice Manual 2009, Quality Housing for Sustainable Communities; Best Practice Guidelines for Delivering Homes, Sustaining Communities 2007 and Sustainable Urban Housing: Design Standards for New Apartments. Guidelines for Planning Authorities 2007 - in the planning for and provision of sustainable communities within new residential areas".

Section 3.2 below sets out an urban design analysis of the site in the context of the '12 criteria' recommended by the above documents. In addition, an Architects' Design Statement by PCOT is submitted under separate cover.

Policy HC 9 states: “Require developers and landowners to prepare Master Plans to ensure integrated and coherent development of large scale development sites and areas”.

The development has been intentionally designed and laid out so that it can connect with potential future development on neighbouring land east and west in compliance with masterplan principles. The Traffic Impact Assessment completed as part of this planning application takes into consideration the proposed SHD development and the future development of the surrounding lands that will also be accessed via the LIHAF Road.

Policy HC10 states: “Encourage the use of homezone principles in the design of residential layouts, particularly where higher density developments are proposed”.

The homezone principle is incorporated within the DMURS statement that accompanies this submission. Hierarchy illustrated in Design Rationale by Landscape Architects RMDA.

Policy HC11 states: “Require applicants for residential developments to demonstrate that a minimum of 25% of the energy requirements of the building is from renewable sources”.

This can be demonstrated at building control stage. All residential units will incorporate high levels of renewable energy technology in conjunctions with high levels of insulation and air-tightness.

Policy HC 12 states: “Ensure that a high degree of building flexibility is incorporated into the design of new dwellings, including adaptability to lifetime housing needs and provision of accessibility for people with impaired mobility”.

The proposed development provides housing units to cover the full spectrum of lifetime housing needs – from 1 bed apartments to 3 bed town houses. As illustrated in the accompanying Architects Design Statement it is also possible to extend the proposed houses. Accessibility will be addressed in accordance with building control requirements.

Policy HC 14: “Require that Master Plans and planning applications for large scale residential developments design and provide bus routes, bus stops and lay-bys in such a manner as to ensure that the majority of residents are no more than 400 metres from a stop”.

The application site is in direct proximity to McBride Rail Station being 800metres (10minute walk distance) from the centre of the application site to McBride Station via McGrath’s Lane/Railway Terrace and the Dublin Road. There is a bus service on the Marsh Road. The site is within 1.5km of the town centre. The applicant will work with service providers to increase permeability to the site as units are occupied. The design and layout of the proposal also facilitates future pedestrian, cyclist and vehicular links to the north side of McBride Station complex which greatly improves accessibility to the station platforms allowing dual approaches in the future with a new access from the north side of the station complementing the existing site access of the Dublin Road.

Policy HC 15: “Require that Master Plans and planning applications for large scale residential developments identify pedestrian and cycle paths within the site and externally to adjoining residential areas, existing services and community facilities”.

The LIHAF funded access road provides a dedicated cycle path. The layout of the proposed development also encourages cycle movement via McGrath’s lane/Railway Terrace. The DMURS statement sets out pedestrian and cyclist connections within and throughout the development.

Policy HC 16: *“Encourage the provision of safe and viable alternatives to the car for school traffic such as walking buses and dedicated cycling routes”.*

As can be seen in Figure 8 above, there are several schools within 1.5km of the site and thus cycling and walking are realistic alternatives to vehicular traffic. A pedestrian/cycle route is provided by way of McGraths Lane/Railway Terrace to the Dublin Road which leads to St. Mary’s Primary School links in with the proposed network of cycle lanes and footpaths within the new neighbourhood providing full connectivity.

Community Facilities

Policy HC24 states:

“Require applicants for residential developments on sites of one (1) hectare or over or for more than 50 residential units to provide an audit of existing community facilities in the locality and where a shortfall in facilities exist, demonstrate how this should be made good, either through provision on site or such other means as are acceptable to the Planning Authority”.

The application site extends to 9.68 hectares and 450no. dwellings are proposed to be provided. Therefore, a community audit has been undertaken and is detailed at Section 1.3.2 of this Statement. In addition to existing facilities in the locality, the proposed development includes 1,278m² of neighbourhood uses, a hierarchy of public open spaces and a crèche.

Childcare Facilities

Policy HC 27 states:

“Ensure that adequate and suitable childcare facilities are provided as required within new residential development having regard to DoEHLG guidelines and the Louth Childcare Strategy.

“Seek the provision of additional community benefits by way of direct provision or financial contribution in lieu of the provision of childcare provision where it is demonstrated to the satisfaction of the Planning Authority that there are sufficient childcare spaces available in the locality”.

A 919.8m² crèche is proposed to cater for up to 120 children. A childcare demand study accompanies this planning application under separate cover.

Conservation and Heritage

Para’s 8.2.6 and 8.2.7 of the Development Plan deal with designated sites and appropriate assessments. Policy CH3 seeks to protect the Boyne Estuary SAC/SPA and the Blackwater SAC from any adverse impacts of development and to require appropriate assessment of any development with potential to impact on such sites. Policies CH4 and CH5 require appropriate assessment screening for projects such as that proposed.

This SHD application is accompanied by a Natura Impact Statement by Openfield due to the potential pathway that exists between the application site and the Natura 2000 network. This report states that the application site is not located within or directly adjacent to any SAC or SPA and cannot result in direct impacts to habitats within any designated area due to the significant distances involved. The report concludes that mitigating measures will avoid any significant negative impact on these areas. An EIAR accompanies this planning application.

The application site boundary extends along McGrath's Lane and Railway Terrace. The site boundary is adjacent to the Railway Terrace Architectural Conservation Area (No. 12) as listed by Table 8.2 of the Development Plan and detailed by Map Ref. No. 12. The improvement works to Railway Terrace proposed do not encroach the ACA.

Water Services and Environment

Policy EN1 of the Development Plan requires that sustainable urban drainage systems be proposed for new developments. It also requires that the capacity required to service new developments is in place prior to any proposals being considered. Furthermore it is required that water services infrastructure in excess of that required for the development be provided.

Please find attached an Engineering Assessment Report by Waterman Moylan Engineering Consultants detailing proposals for foul water drainage, surface water drainage and water supply, including a Design Acceptance Statement from Irish Water. Section 3.5 of this the Engineering Assessment Report details the applicant's consideration of SUDS selection for the proposed development including the use of water butts, filter drains, swales and underground attenuation tanks for the storage of surface water during storm events. Irish Water have confirmed there is sufficient capacity in the wastewater network and sufficient water supply to service the proposed development.

2.2.4 DEVELOPMENT MANAGEMENT

Density

Table 6.2 of the Development Plan requires minimum densities of 50 dwellings to the hectare for development within the Drogheda Transport Development Area. This requirement is reinforced by Policy HC17.

The proposed development with a density of 62 units to the hectare complies with this requirement.

(Density calculated on site area excluding LIHAF Road and associated embankments and McGrath's Lane/Railway Terrace as these elements are 'non-developable' in keeping with the Guidelines - Sustainable Residential Developments in Urban Areas (2009).

Private Amenity Space

Development Plan private amenity space standards are set out in Table 3.1 below. These requirements are reinforced by Policy HC18.

Dwelling Unit Type	Min. Private Open Space Standard
House 1-2 bedrooms (greenfield / suburban)	60m ²
House 3+ bedrooms (greenfield / suburban)	80m ²
House (town centre / brownfield)	50m ²
Apartment / duplex (greenfield / suburban)	
1 bed unit	20m ²
2/3 bed unit	40m ²
Apartment / duplex (town core / brownfield)	
1 bed unit	10m ²
2/3 bed unit	20m ²

Table 10 – Private Amenity Space Standards (as per Table 6.6 of Development Plan)

Three bedroom houses proposed (Type A) have garden average garden sizes of 88m² while two bedroom houses (Type A1) have an average garden size of 61m².

All apartments have private amenity space in the form of balcony / terrace. In all cases the private amenity space for apartments exceed the recommendations of the Sustainable Urban Housing: Design Standards for New Apartments (2018) which supersede those of the Drogheda Borough Development Plan.

Public Open Space

It is a requirement under the Development Plan that no area of public open space be less than 200m² in area and no edge or boundary to be less than 10 metres in length (Policy HC19). For developments comprising between 200-499 dwellings, it is a requirement to provide one juvenile playing pitch size up to GAA/soccer pitch size. In terms of quantitative requirements, for green-field sites the Development Plan requires a minimum of 14% of the total site area shall be provided as public open space and this should be in the form of useful open spaces within the development and larger parks to serve the wider community.

The proposed development provides 15,905m² of public open space equivalent to 22% of the site area. The breakdown of open space is as follows. Please see Landscape Rationale by RMDA for further details.

Natural Playground	Children's Playground and seating area	3,315m ²
Central Green	Walking, informal "Kick about" activity area and seating.	3,867m ²
Neighbourhood Square	Spill out area for neighbourhood uses. Seating areas and pedestrian zone.	3,390m ²
Civic Plaza	Hard Landscaped area adjacent to employment uses with green space to the south for relaxation and informal activities.	2,777m ²
Communal Open Space	Passive recreation and relaxation areas for apartment residents.	2,556m ²

Table 11 – Identity and Function of Open Space

Car Parking

Development Plan car parking requirements as per Table 5.4 are shown in Table 12 below. Parking allocation is illustrated by way of architect drawing no. PL06 that accompanies this SHD application. Table 7 outlines the car parking rationale as proposed. It is submitted the level of car parking meets with National Policy to reduce reliance on the private car particularly in accessible urban locations and is in keeping with Development Plan requirements.

Land Use	Development Plan Standard
Dwelling	2 per unit
Apartment	1.3 per unit
Neighbourhood Uses -(Retail (shop)	1 per 30m ²
Office	1 per 50m ²
Crèche	1 per 2 employees & 1 per 4 children & Set down area

Table 12 – Development Plan Car Parking Requirement

Housing	81no.	2 per house	162
		1 visitor space for every 8 houses	11
			173
Duplex Apartments	24no.	1 per unit	24
		1 visitor space for every 8 units	3
			27
Apartments	345no.	1 per apartment	345
		1 visitor space for every 7.5 apartments	43
			391
Neighbourhood Uses	1,277.8sq.m	1 per 29sq.m	44
Office	1,902.8sq.m	1 per 48sq.m	40
Crèche	919.8sq.m		22 + Set down area (10 spaces)
Visitor			33
Total			740

Table 13– Car Parking Provision in Proposed Development

Apartments: Parking provision for the apartments follows the Guidance contained within the Sustainable Urban Housing: Design Standards for New Apartments (2018).

Neighbourhood Uses: Indicative neighbourhood uses have been included on the floor plans for buildings 9 and 10 such as a small convenience store, retail support services such as dry cleaner and hair dresser with final uses to be confirmed with the planning authority prior to occupation. These units will be local in scale and so the Retail (Shops) Land Use category has been applied.

Crèche: It is envisaged that the crèche will be used primary by residents living in the new neighbourhood who are all in reasonable walking/cycling distance from it via dedicated pedestrian and cycle routes. The crèche has been designed to cater for 120 children which would require an estimated 21 teachers, depending on the end user service provision. Parking for all staff is provided in the underground car park with a set down area equivalent to ten car parking spaces provided at surface level.

Privacy and Spacing Between Buildings

A distance of at least 22m between the windows of habitable rooms which face those of another dwelling is recommended. Roof terraces are not acceptable where that would directly overlook neighbouring habitable rooms or rear gardens.

This standard is achieved within the site and is also respectful of existing residential dwellings on McGraths Lane. More traditional terraced housing is proposed at the south west and south east corners of the site with separation distances of at least 17 metres from the site boundary. First floor terraces associated with duplex units are located on the western boundary and do not directly overlook neighbouring habitable rooms or rear gardens. Apartment buildings are adequately distanced from proposed three storey housing by at least 27.5 metres and private garden areas (24.6m) so as not to have an overbearing impact on residential amenity or loss of privacy for residents of apartments or housing. Back to back separation distances between three storey terraced housing is at least 25.5metres.

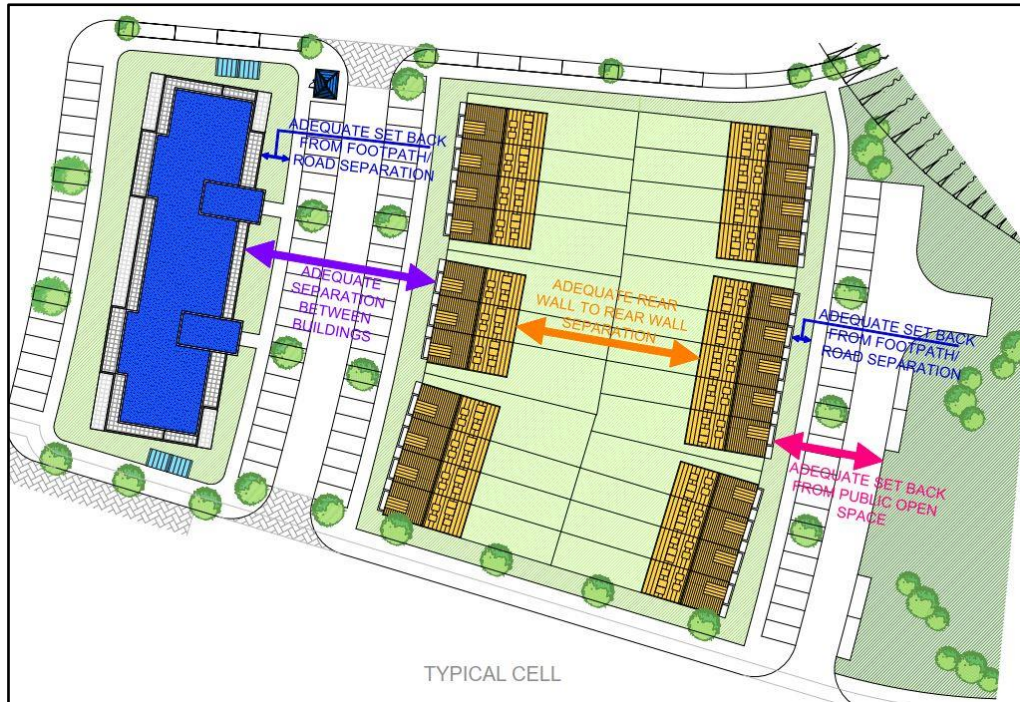


Figure 20 – Extract from the Architects Design Statement

Internal Space Requirements

Policy HC21 requires that all residential developments, including apartments, comply with the internal space standards set out in Appendix 3, which replicate the standards set by Quality Housing for Sustainable Communities (2007). Table 6 below sets out the internal space achieved in proposed dwellings against this standard.

It is noted that apartment standards set out in the Drogheda Plan have been superseded by the ‘Sustainable Urban Housing: Design Standards for New Apartments. Guidelines for Planning Authorities (DoECLG, 2018), which take precedence over any conflicting policies and objectives of development plans. Please see section 3 of this statement for compliance of the apartments with the Section 28 Guidance.

House Type	Target GFA m ²	Provided m ²	Minimum Aggregate Living Area m ²	Provided m ²	Minimum Aggregate Bedroom Area m ²	Provided m ²	Minimum Storage Area m ²	Provided m ²
A 3-storey House 3 bed / 6 person	110	138.6	37	37	36	51.3	6	7.1
A1 3-storey house 2-bed/4 person*	102	138.6	34	35	32	38.2	5	7.1
B2 2-storey Duplex 3 bed / 5 person	92	126.4	34	51	32	40	5	6.8

*There is no specific standard included for a three storey house with two bedroom as proposed. Therefore this house type has been assessed against the 2 storey/3-Bed/5 Person House Type.

Table 14 - Assessment of the proposed house types against the requirements of Quality Housing for Sustainable Communities

Waste Storage

Policy HC 22 requires that provision is made for the storage, segregation and recycling of refuse and for convenient access for its deposit and collection. Table 6.7 of the Development Plan elaborates on the Policy and requires the following:

Terraced / duplexes: communal bin storage facilities in a secure well screened locations convenient to the units served and for the purposes of collection

Apartments: Communal bin storage facilities should be provided in a secure well ventilated space within the basement of the apartment block convenient to the units served and for the purposes of collection

Town houses have dedicated bin storage areas to the front to store bins. These areas are screened and have been integrated into the landscape masterplan as detailed in the Landscape Rationale by RMDA that accompanies this application. Apartments will have use of communal bin storage facilities in purpose built refuse storage buildings (Drawing PL-102). Bin locations are indicated on the site layout plan (Drawing No. PL 01) and their location is addressed by the Landscape Rationale. Their location is both convenience for residents and for collection from the public road. All communal bin storage areas have been assessed by AWN Consulting as part of the waste management plan for the development and are adequate to cater for the predicted number of residents and employment uses and satisfy the three-bin system. As illustrated by Drawing No. PL-102, the bin storage areas will have a high quality finish and will be adequately ventilated.

Boundary Walls

Para. 6.7.14 of the Development Plan requires that a 2 metre high masonry wall be provided along the rear boundary of all new residential proposals. Furthermore, where residential developments front directly onto local distributor roads or other high capacity routes a set back and boundary treatment shall be provided.

RMDA have prepared a landscape boundary treatment plan (Drawing No. 04). This includes the provision of a 2 metre high masonry wall along the rear boundary of proposed housing.

2.3 LOCAL PLANNING GUIDANCE AND OTHER STUDIES

2.3.1 PLANNING STRATEGY FOR GREATER DROGHEDA AREA 2007 (DROGHEDA, EAST MEATH, COUTH LOUTH)

The Planning Strategy Document for the Greater Drogheda Area outlines the desired framework for a mixed commercial and transport interchange. Section 6.4.3 - Area 4: Drogheda Train Station of the strategy states -

“The current development plan has designated the station and its environs as the Drogheda Transportation Development Area (DTDA), based on the concept of promoting high-density, mixed-use developments defined by their proximity to transport hubs. Among the land uses the Borough Council makes provision for in the DTDA are high capacity transport facilities, high-density residential and mixed-use schemes, and leisure, tourism and recreational facilities such as exhibition and conference venues. Future planning strategies for this area should focus on the development of public transport facilities for Drogheda with McBride Station becoming the focus of a major transport interchange involving rail, national and local bus services. Growing demand will see the provision of metropolitan rail services to Dublin, Navan and Dundalk, as Drogheda realises its potential as a prime urban centre. A masterplan for the station lands should be developed to maximise the development potential of this area; multi-storey car parking should be considered (with a potential increase in capacity) and signature buildings should be considered to reflect the area's important function. Enhancing links to the town centre is vital and the Viaduct offers a natural opportunity

for a new pedestrian route making use of its stunning views over the town. Higher density residential and commercial activity along Marsh Road should also be encouraged in tandem with improvements to the infrastructure and road capacity of the area, to better integrate this area with the centre” (underline added).

Thus it is evident that development of the lands as proposed is consistent with the 2007 Planning Strategy for the Greater Drogheda Area. While the lands have been designated as part of the DTDA since 2007, the applicant is not aware that Meath/Louth Local Authority have undertaken any significant steps towards exploring the preparation of a masterplan for lands in this area. In any case, the application lands occupy a small proportion of lands in this area and their development would not prejudice the preparation of any potential masterplan in the future. The development has been intentionally designed so that it can connect with potential future development on neighbouring land both east and west. It is further noted that application Ref. No. 17/387 was permitted without it being required to have a masterplan in place. Funding for the LIHAF road is in place which further reinforces the strategic importance of residential development on this site.

3.0 CONSISTENCY WITH SECTION 28 GUIDANCE

3.1 CONSISTENCY WITH SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS (SRDUA) 2009

The 2009 SRDUA and accompanying Urban Design Manual contain a set out guidelines and parameters aimed at creating high quality, sustainable and lasting new residential areas. Some of the key objectives of these Guidelines can be summarised as follows: -

- Prioritise walking, cycling and public transport and minimise dependence on the private car.
- Deliver a high quality of life in terms of amenity, safety and convenience.
- Promote social integration
- Promote efficient use of land and energy.
- Provide a mix of land uses to minimise transport demand.

Section 4 of the Guidelines contains recommendations and guidelines for the creation of sustainable residential areas.

A sustainability checklist is set out at the end of Section 4. The following sections of this Statement demonstrate how the proposed development complies with the items on this checklist.

Are the lands proposed for development in accordance with the sequencing priorities set out in the Development Plan or Local Area Plan?

- The development site in its entirety is zoned 'Drogheda Transport Development Area' and calls for the provision of high density residential and commercial development.
- The lands are not subject to any phasing as per Variation No. 1 Core Strategy of the Drogheda Borough Development Plan 2011-2017.
- The lands are between 1-1.5k metres of the town centre and also within 600 metres of Drogheda Railway station.

Is there capacity in the existing schools to accommodate the proposed development?

- There are 8 primary schools located within approx. 2km of the site, with five post-primary facilities located within the same distance. A new secondary school is planned which will cater for 600 students from September 2019 within the catchment area of the application site.

Is there an appropriate range of community and support facilities available to serve the site?

- The site is accessible to a range of shopping facilities and formats that includes Scotch Hall Shopping Centre (c.800m from the site) and Southgate Shopping Centre. Both facilities are home to a range of convenience and comparison shopping facilities.
- There are four medical centres within 1km of the site (Two on Bryanstown Cross Route, two on the Dublin Road and a further doctor's surgery at Southside Medical Centre, also on the Dublin Road) in addition to those in the town centre. All medical centres are complimented by retail pharmacies in close proximity.

Is there adequate public transport to serve the development?

- The site is within walking distance of MacBride Train Station. There are also high frequency/capacity bus routes along the R132 Dublin Road which is also within walking distance. These bus routes include the 101 and 101X which run several times per hour during peak periods and service Balbriggan, Dublin Airport and Dublin City. There is also a local bus service on Marsh Road linking with the town centre of Drogheda.

- The DART will be expanded to Drogheda providing additional services to/from Dublin City.
- Site is located in an emerging residential area that is prioritised for development at local, regional and national planning policy level.
- Subject site in conjunction with adjoining lands for which planning was recently granted (P.A. Ref. No. 17/387) will act as a catalyst for development in the area.
- LIHAF funding to the access road in conjunction with critical mass generated by these developments will ensure the expansion and improvement to public transport infrastructure in the area is viable.

Will the development prioritise sustainable transport modes?

- Yes. The application site is directly proximate to McBride Rail Station.
- The proposed development includes upgrade works to McGraths Lane/Railway Terrace as illustrated by Waterman Moylan drawing nos. 16-137-P150 & P151
- The internal road network is designed in accordance with DMURS standards with priority given to pedestrians and cyclists and full connectivity throughout the site.
- Design and layout provides direct connectivity to established urban areas to the north and west and also provides for future connectivity with adjoining undeveloped lands to the east and west.

Will the development ensure accessibility for everyone including people with disabilities?

- Layout is clear and legible to allow ease of movement.
- All dwellings are designed to comply with the recommendations Technical Guidance Document M of the Building Regulations 2010.
- There is a hierarchy of open space that is accessible and caters for the recreational needs of multiple users

Will the development ensure more efficient use of energy?

- All dwellings have the option for the installation of photovoltaic/solar panels on roof slopes.
- All dwellings will comply with the minimum requirements of Part L of the Building Regulations 2011 Technical Document on Conservation of Fuel and Energy - Dwellings.

Will the development include the right quality and quantity of open space?

- 1.6 hectares of the site (22%) of the site is allocated for open space uses.
- Open space is provided in a variety of forms adequately sized for the development.
- Public Open Space is provided primary by clearly identifiable spaces each with their own functions and distributed throughout the site.
- Open spaces are well connected by footpaths and cycle paths and supervised by adjacent uses. All dwellings are in close proximity to open space.
- Open space areas include passive and active recreational areas, including a fully equipped children's play area.
- A comprehensive landscape plan for the open space areas has been prepared by a qualified Landscape Architect together with a Landscape Rationale.

Will the development include measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood?

- Development is designed in accordance with the principles of defensible space with dwelling units overlooking public open space, internal roads and parking areas.
- The development has been assessed by Waterman Moylan Consulting Engineers who have concluded the development is compliant with DMURS.
- A Road Safety Audit has been undertaken

Present an attractive and well maintained appearance?

- The proposed development has been designed by firm of RIAI architects.
- Proposal will consist of high quality materials and finishes (please refer to Architects Design Statement and Building Life Cycle Report under separate cover).
- The new neighbourhood will be fully landscaped in accordance with landscape plan by fully qualified and accredited landscape architect.
- A Management Company will be established.

Will the development promote social integration?

- Development consists of a mix of dwelling types and sizes in keeping with requirements of DBDP 2011-2017 (as extended and varied) and in compliance with Part V of the Planning and Development Act 2000 as amended.

Will development protect and where possible enhance the built and natural heritage?

- Development has been subject to AA Screening followed by a Stage 2 Natura Impact Assessment.
- The site has been surveyed to ensure the protection of potential bat roosts on site.
- Existing hedgerows and trees are retained where possible and supplemented with native species as per the Landscape Masterplan by RMDA.
- Planting will include pollinator friendly in recognition of the All-Ireland Pollinator Plan
- The site has been subject to initial desk top study followed by geophysical survey and test trenching under licence. The proposed resolution for archaeological material discovered is been to record and excavate. A licence (19E0433) for this work has been granted by the National Monuments Service.
- There are no protected structures within the site.
- The proposed development does not impact upon the townscape of Drogheda, its historic buildings or strategic views.

Provision for Sustainable Urban Drainage System?

- Proposal is designed in accordance with SUDS principles. Please refer to Engineering Assessment Report by Waterman Moylan Consulting Engineers for full details enclosed under separate cover.

3.2 CONSISTENCY WITH URBAN DESIGN MANUAL – A BEST PRACTICE GUIDE (2009)


The companion document to the Sustainable Residential Development in Urban Areas Guidelines, the Urban Design Manual, identifies 12 essential criteria against which all new residential development will be assessed. These criteria include *Context, Connections, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Privacy and Amenity, Parking and Detailed Design*. The Architects Design Statement by PCOT Architects under separate cover provides a detailed description of the design evolution and evaluates the proposal with regard to the 12 core principles. This Section of the Statement of Consistency supports and elaborates on the Architect Design Statement.

Core Principles of Urban Design

The following sections of the statement consist of an urban design analysis of the proposed development with reference to these 12 criteria. The discussion on each criterion (summarised in bullet point form) is by way of reference to the indicators set out on pages 10-11 of the Urban Design Manual.

	<p>01 Neighbourhood Context: <i>How does the development respond to its surroundings?</i></p>
	<ul style="list-style-type: none"> ▪ The development utilises appropriately zoned and serviced land within the urban development limit and sits within the context of an overall mixed use area. ▪ The density and building form is appropriate to the existing development pattern in the wider area. A development density of 62 dwellings per hectare is achieved. The density accords with national and regional planning policy and also with specific density as contained in local planning policy documents and plans. ▪ The form, architecture and landscaping sits within an overall site plan with a consistent architectural theme and style with subtle variety in materials, articulation and massing commensurate with building use, topography and the wider contextual setting of the site. ▪ The development is wholly in keeping with the nature and character of the surrounding area. ▪ Boundaries between the proposed development & adjoining land have been one of the design principles. Boundaries will be supplemented with additional planting and landscaping. The development is landscape led with the landscape scheme for the development prepared by a fully qualified and experienced landscape architect. ▪ The development successfully relates to its external context, particularly proximity to McBride Rail Station
	<p>02 Neighbourhood Connections: <i>How well connected is the new neighbourhood?</i></p>
	<ul style="list-style-type: none"> ▪ The development on zoned and serviced lands within the 80kph speed limit zone is directly adjacent existing roads with footpaths and public lighting. ▪ The Marsh Road (R150) is served by a footpath from the application site to the town centre. The proposed development will tie into the existing network as illustrated by Waterman Moylan Consulting Engineers Drawings 16-137-P101 &P108. ▪ Walking/cycling are realistic options for travelling between the development and neighbouring community / retail / business / employment uses / transport hub given the proximity of the site to such uses. McGrath's Lane and Railway Terrace will be upgraded to provide improved pedestrian and cyclist provision. ▪ Weekly / bulky shopping needs are within easy driving distance. There will be limited local need retail provided for within the proposed development. ▪ The density, close to educational, service and employment facilities, is conducive to an efficient public transport system. The LIHAF road could form part of a public transport route through the development in the future. ▪ The development provides for potential connections to adjoining undeveloped land. ▪ The layout is designed to ensure high levels of connectivity within the site and between the site and adjoining lands.

	<p>03 Inclusivity <i>How easily can people use and access the development?</i></p> <ul style="list-style-type: none"> ▪ The development is designed with functionality and comfort in mind. Pedestrian paths follow desire lines with Green Routes throughout the site as illustrated by the Landscape Rationale. ▪ Design and layout is clearly legible. ▪ Public open spaces (both hard and soft landscaped) will provide for formal and informal social and recreational interaction. ▪ There is clear rationale for the location, design and function of each area of open space which are unified by way of a central spine. ▪ All elevations have distinctive architectural treatment to provide for positive aspect to passers by and to create visual interest. ▪ The proposal is not for a ‘gated’ community. ▪ Proposed housing caters for full lifetime spectrum of housing needs.
	<p>04 Variety <i>How does the development promote a good mix of activities?</i></p> <ul style="list-style-type: none"> ▪ The development will contribute towards generating sufficient population on appropriately zoned and serviced lands to assist in contributing to the viability of the town centre and compact growth of Drogheda. It will increase the population of the general area thereby making provision of facilities/services more viable. ▪ The proposed housing types and tenure will add to the choice available in the area. A mix of terraced dwellings, duplexes and apartments are proposed. ▪ Furthermore the scheme provides for neighbourhood uses (café/restaurant, hairdresser) as well as office units and a crèche. ▪ The provision of a high level of quantity open space will encourage an active lifestyle
	<p>05 Site Efficiency <i>How does the development make appropriate use of resources, including land?</i></p> <ul style="list-style-type: none"> ▪ Within the context of a landscape design approach, the topography of the site to a large degree dictates the fundamentals of the proposed layout, yet the layout still achieves a substantial number of dwellings with habitable rooms benefitting from solar gain. Elsewhere with many other dwellings, the off centre orientation (e.g. north-east to south west layout) means that they can still benefit from solar gain. ▪ Substantial areas of open spaces and landscaping can facilitate water run-off and drainage. ▪ Tree and shrub planting will soften built elements in addition to enhancing biodiversity. ▪ The land is within the defined built up area and on serviced and appropriately zoned land. ▪ The density of the development reflects the location of the site and its immediate context, in proximity to McBride Train Station and Drogheda Town Centre.

	<p>06 Distinctiveness: <i>How do the proposals create a sense of place?</i></p> <ul style="list-style-type: none"> ▪ The architecture is legible and recognisable. Colour, articulation, layout and proportions combine to create a distinctive development. ▪ The form, architecture and landscaping sits within an overall integrated site plan with a consistent architectural theme and style with variety in materials, articulation and massing. Overall the site plan creates a positive identity to the site. ▪ Well connected and supervised central formal & informal open spaces become focal points, and activity is spread equally across the site. ▪ The location of the site facilitates architectural expression (e.g. being relatively self-contained and unbounded by development to the east) within an overall unified design context. The variety in style adds to the distinctiveness of the development, avoiding a bland repetitive design approach.
	<p>07 Layout <i>How does the proposal create people friendly streets and spaces?</i></p> <ul style="list-style-type: none"> ▪ Layout actively promotes permeability and desire lines. Pedestrian/cyclist permeability is not sacrificed to vehicular permeability. ▪ Majority of buildings face onto open space areas to promote social interaction and ensure safety/passive surveillance. ▪ Where surface car parking is provided it is kept within view. ▪ Statement of compliance with DMURS is submitted. ▪ Attractive open spaces combine hard-surfaced urban squares and grassed areas providing distinct opportunities for these spaces to be used for different social or recreational purposes.
	<p>08 Public Realm: <i>How safe, secure and enjoyable are the public areas?</i></p> <ul style="list-style-type: none"> ▪ Public areas are overlooked by buildings on all sides. ▪ There are no gable ends directly adjoining open space. ▪ The public open space areas are an integral element of the design. Through a mix of hard-surfaced urban squares and 'green' open spaces, they promote social interaction, environmental sustainability in addition to enhancing permeable circulation routes. ▪ Semi-public space is easily distinguishable throughout the development. ▪ Rather than dominate the layout, roads and parking have been designed such that the public realm is prioritised yet not at the expense of convenience of access to roads/parking. ▪ All open spaces are functional and useable with a clear rationale. ▪ Open spaces are distributed across the site and are easily accessible from dwellings.

	<p>09 Adaptability: How will the buildings cope with change?</p> <ul style="list-style-type: none"> ▪ The dwellings will readily lend themselves to extension/adaption (subject to planning requirements) and personalisation. ▪ There is a range of house types and sizes in the development to suit a variety of housing needs e.g. 1-3 bed units. Such a variety can facilitates upsizing & downsizing as needs change over time. The dwelling mix includes houses, duplex and apartments including 3-bedroom apartments suitable for family living. ▪ The orientation of the buildings and roof shapes readily lend themselves for potential solar panels / photo voltaic cells. Provision is made for solar panels on all house type A and A1. ▪ Building Regulations Part L – ‘Conservation of Fuel and Energy in Buildings’ is in place to limit the energy use and carbon dioxide emissions from a building as far as is practicable and requires an energy performance and carbon dioxide emissions performance that is 60% better than the 2005 Part L requirements. This is recognised as an advanced performance requirements for buildings. ▪ Storm Water Drainage systems design to accommodate a 1:100 year store event accounting for a 20% increase with Climate.
	<p>10 Privacy and Amenity: How does the scheme provide a decent standard of amenity?</p> <ul style="list-style-type: none"> ▪ A significant amount of units face onto at least one of several public open spaces but are sufficiently set back from such spaces to prevent adverse impacts to privacy. ▪ ‘Stacking’ of rooms within apartment blocks minimises potential for adverse sound transmission between levels. ▪ Landscaping ‘Privacy Zones’ and front parking will ensure ground level windows are afforded adequate separation from circulation paths. ▪ Rear wall to rear wall separation distances meet the 22m ‘rule of thumb’. ▪ All houses provide internal room sizes and storage spaces and private rear gardens in line with relevant planning policy and standards. ▪ All dwellings meet Development Management requirements of the Drogheda Borough Development Plan in terms of room sizes, private amenity space, car-parking and separation distances. All apartments meet requirements of the <i>Sustainable Urban Housing: Design Standards for New Apartments. Guidelines for Planning Authorities</i> (DoECLG, 2018).


	<p>11 Parking: <i>How will the parking be secure and attractive?</i></p> <ul style="list-style-type: none"> ▪ Parked cars are overlooked and easily viewable by all units. On-street parking in the manner proposed will have the effect of reducing traffic speeds on internal roads (e.g. cars manoeuvring in / out of spaces will slow on-coming traffic) ▪ Landscaping and planted strips break up parking areas. ▪ 38% of car parking is provided underground. ▪ A mix of surface and underground car parking is provided for apartments so that occupiers have access to car parking even when the private car is not the primary means of transport to school or work.
	<p>12 Detailed Design: <i>How well thought through is the building and landscape design?</i></p> <ul style="list-style-type: none"> ▪ The landscape masterplan has been prepared by a firm of qualified and experienced landscape architects. ▪ A Landscape Rationale forms part of the application documentation and sets out the thought process behind the location and distribution of open spaces within the development. This document also contains information on the intended primary function of each of the open space areas, including urban squares and soft landscaped areas. ▪ The landscape design actively facilitates and promotes the use of central public open spaces from the outset. All spaces are over looked, useable and functional. ▪ Landscaping and planted strips break up parking areas where required. ▪ A planting plan and planting details are provided as part of the application documentation. ▪ Materials and external design will make a positive contribution to the locality as detailed in the Architects Design Statement. ▪ All buildings and public areas are designed for ease of maintenance.

Table 15 – Assessment of the Proposed Development against the 12 Principles of the Urban Design Manual

3.3 CONSISTENCY WITH SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS (2018)

Table 16 below summarises the proposals compliance with the Specific Planning Policy Requirements (SPPR) and objectives contained in the Design Standards for New Apartments. Table 17 provides a breakdown of the internal floor areas with regard to the standard set at Appendix 1 of the Guidelines.

Standard	Policy / Requirement	Provided
<i>Exceed minimum floor area</i> <i>Para 3.8</i>	The majority of all apartments in a proposed scheme of 10 or more must exceed the min. floor area standard by a minimum of 10%. It is acceptable to redistribute part of the min 10% additional floorspace requirement throughout the scheme, i.e. to all proposed units.	The minimum floor area required for the 369 apartments is 24,976m ² . The proposed floor area for the 369 apartments is 29,415.7m ² . Thus the proposal exceed the minimum requirements by 4,439m ² equivalent to 18% above the minimum requirements.
<i>Dual Aspect</i> <i>SPPR4</i>	The minimum number of dual aspect apartments that may be provided in any single apartment scheme shall be 33%.	This is achieved and exceeded. 80% of the proposed apartments are dual aspect.
<i>Floor to Ceiling Height</i> <i>SPPR5</i>	Min floor to ceiling height must accord with Building Regulations requirement of 2.4m, except in relation to ground floor apartments, where it should be greater. It is a specific planning policy requirement that ground level apartment floor to ceiling heights shall be a minimum of 2.7m.	This is achieved and exceeded. Ground floor apartments have floor to ceiling heights of 3m and upper floors 2.8m.
<i>Lift and Stair Cores</i> <i>SPPR6</i>	Up to 12 apartments per floor per individual stair/lift core may be provided in apartment schemes.	There are no more than 8 apartments per floor in any apartment building, and no more than 1 lift core per 4 apartments on any floor.
<i>Security Considerations</i> <i>Para's 3.40 - 3.42</i>	Blocks & buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, & overlooked by adjoining dwellings.	This is achieved. All entrances are overlooked by many apartments.
<i>Car Parking</i> <i>Para's 4.18 – 4.20</i>	Parking to be minimised and substantially reduced in central & accessible urban locations.	Parking proposed is detailed above in Table 9 & 13. Please see TTA by Waterman Moylan under separate cover.

Standard	Policy / Requirement	Provided
<p><i>Refuse Storage</i></p> <p><i>Para. 4.8</i></p>	<p>Refuse facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage.</p>	<p>There is adequate space adjacent to the kitchen and/or hall of each apartment for the temporary storage of segregated materials. A communal bin storage area is conveniently located outside each apartment block and beside access roads for ease of access by refuse lorries.</p>
<p><i>Communal Amenity Space</i></p> <p><i>Para's 4.10 - 4.12</i></p>	<p>Space should be accessible, secure & usable. There should be a distinction from private amenity space. A minimum of 5m², 7m², and 9m² communal space is required for each 1, 2 & 3 bed apartment respectively.</p>	<p>Semi-private amenity space is provided around each apartment block, and this is in addition to the public open spaces across the site which are convenient to all blocks. Based on the mix of apartments proposed, apartments require 2,463m². 2,556m² is provided and fully landscaped.</p>
<p><i>Children's Play</i></p> <p><i>Para's 4.13-4.14</i></p>	<p>As far as possible, the safety needs of children need to be taken into consideration and protected throughout the entire site, particularly in terms of safe access to larger communal play spaces. The perimeter block with a central communal open space is particularly appropriate for children's play</p>	<p>Children's play areas will be provide for in the public open spaces including a Natural Park and level grassed areas for informal kick about. Please refer to Landscape Architects Design Rationale under separate cover.</p>
<p><i>Bicycle parking and storage</i></p> <p><i>Para's 4.15 – 4.17</i></p>	<p>1 space per bedroom & visitor provision of 1 space per 2 apartments. Directly accessible from public road. Of safe and secure design.</p>	<p>Based on the apartment mix proposed, 863 cycle parking/storage spaces are required. A total of 853 cycle parking spaces are provided. Ground floor duplex apartments can store bicycles in their rear gardens.</p> <p>All proposed bicycle parking spaces at surface level are directly accessible from the public road and overlooked for security.</p> <p>Bicycle parking will be under a shelter with provision for safely securing bikes located in the basement car parks.</p>

Table 16- Compliance with the Design Standards for New Apartments. Guidelines for Planning Authorities (DoECLG, 2018)

Apartment Floor Areas																
SPPR 3																
No. of Units	Unit Type	No. of Bedrooms	Floor Area	Min Req.	Living/Kitchen/Dining Area	Min Req.	Bed 1	Bed 2	Bed 3	Aggregate Bed Area	Min Req.	Storage	Min Req.	Private Open Space	Min Req.	Aspect
72	C	2	86,8	73,0	31,6	30,0	16,5	12,9		29,4	24,4	6,0	6	11,2	7	dual
72	D	2	83,3	73,0	30,3	30,0	14,2	12,0		26,2	24,4	6,0	6	16,0	7	dual
72	E	1	55,5	45,0	25,7	23,0	13,7			13,7	11,4	3,3	3	7,0	5	single
68	F	2	85,4	73,0	30,6	30,0	14,1	12,2		26,3	24,4	6,0	6	8,7	7	dual
4	F1	2	85,4	73,0	30,6	30,0	14,1	12,2		26,3	24,4	6,0	6	9,5	7	dual
19	G	1	52,4	45,0	23,6	23,0	12,0			12,0	11,4	3,0	3	21,7	5	dual
19	H	3	101,5	90,0	34,1	34,0	13,0	11,5	8,9	33,4	31,5	9,1	9	39,2	9	dual
19	J	2	82,0	73,0	30,6	30,0	13,0	11,5		24,5	24,4	6,1	6	21,0	7	dual
Duplex Apartments																
12	B1	2/3p	85,4	63,0	39,2	28,0	13,6	9,0		22,6	20,1	6,1	5	16,5	6	dual
12	B2	3	126,4	90,0	50,8	34,0	17,1	13,1	9,8	40,0	31,5	6,8*	9	16,4	9	dual

*3-bedroom 2-storey duplex apartments occupy first and second storey level with access to attic space provided by way of a folding ladder. This is in addition to storage provided at first and second floor for everyday storage and laundry. In the case of duplex accommodation, the Guidelines state that additional floor area is required to provide for stairways and landings must be provided in accordance with Building Regulations. This will be adhered to

Table 17 – Compliance with required minimum floor areas and standards

Apartment Mix: SPPR 1 states that apartment developments may include up to 50% one-bedroom type units. The Guidelines note that the 2-bedroom/3 person apartment type can provide variation in dwelling size but should not exceed 10% of the total number of units in any private residential development. The proposed apartment mix accords with these guideline as follows-

1-Bed	91	25%
2-Bed/2P	12	3%
2-Bed/4P	235	64%
3-Bed	31	8%

Table 18 – Apartment Mix

3.4 CONSISTENCY WITH URBAN DEVELOPMENT AND BUILDING HEIGHTS (DECEMBER 2018)

The National Planning Framework identifies building height as an important measure for urban areas to deliver and achieve compact growth (NPO 13). The newly adopted Guidelines on Building Heights state that development outside town centre and city locations should not be subject to specific height restrictions. Increased building height is encouraged.

SPPR 4: It is a Specific Planning Policy Requirement that in planning the future of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amended or replacement Guidelines;*
- 2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly but not exclusively so in any one development of 100 units or more.*

The Sustainable Residential Development in Urban Areas Guidelines recommend that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station. In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors (para. 5.8). **The proposed development represents a net density of 62 units per hectare.**

It is recognised in the Guidelines that medium density (35-50 dwellings per hectare net) residential developments can "address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends, while at the same time providing the for the larger 3, 4 or more bedroom homes across a variety of building typology and tenure options, enabling households to meeting changing accommodation requirements over longer periods of time without necessitating relocation. These forms of development set out above also benefit from using traditional construction methods, which can enhance viability as compared to larger apartment-only type projects" (para. 3.4).

The proposed development achieves the variety of accommodation noted above and caters for changing accommodation requirements while increasing overall density in recognition of the site's strategic location in proximity to Drogheda Train Station. Buildings ranging in height from 3 storey to 5 storey will provide good enclosure and will create a strong sense of urban neighbourhood together with the public open spaces and civic squares proposed. Building typologies proposed include apartment buildings, duplex apartments and 3 storey terraced townhouses.

3.5 CONSISTENCY WITH DESIGN MANUAL FOR URBAN ROADS AND STREETS (2013)

The principal tenet of the 2013 *Design Manual for Urban Roads and Streets* is to put well-designed streets at the heart of sustainable communities. The Guidelines aim to promote real alternatives to car journeys and encourage lower vehicle speeds in urban areas with a view making streets safer.

Access to the development and internal access roads serving proposed dwellings have been designed in accordance with DMURS standards. In keeping with the general principles of DMURS, the internal road network serving the development incorporates speed reduction bends and home zones in order to limit vehicles speeds to prioritise residential areas for pedestrians and to incentivise walking and cycling.

All roads are wide enough to accommodate access by refuse vehicles and other similar vehicles with turning heads provided where necessary.

Please refer to supporting statement and drawings by Waterman Moylan Consulting Engineers for detailed technical analysis of consistency with DMURS.

3.6 CONSISTENCY WITH CHILDCARE FACILITIES AND GUIDELINES FOR PLANNING AUTHORITIES (2001)

Section 2.4 of the *2001 Childcare Facilities - Guidelines for Planning Authorities* recommend that in new housing areas at least one childcare facility for each 75 dwellings would be appropriate. In this regard the Guidelines states,

“For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate”.

By reference to Circular Letter PL 3/2016 issued by the Department of Environment, Community and Local Government dated 31st March 2016, it is noted the Department is considering revising the 2001 Childcare Guidelines. However, the proposed development includes a crèche that meets with the benchmark of a childcare facility for 20 children for every 75 dwellings. The crèche is proposed in a single three storey building catering for 120 children as illustrated by Architect Drawing No. PL-301.

3.6.1 CHILDCARE DEMAND ASSESSMENT

It is proposed to provide a childcare facility as part of this project. This building is located to the north of the application site adjacent to the proposed office building. The building as proposed could accommodate up to 120 children depending on age groups and services offered by the end user.

A full analysis of existing childcare capacity and projected demand is contained in the Childcare Demand Study under separate cover. It is submitted that there is an identified need for the proposed childcare facility. The location is appropriate given the mix of uses proposed under this SHD planning application, having regard to permitted development of 133no. houses under P.A. Ref. 17/387 which does not contain a childcare facility and its location relative to existing services as illustrated by figure 8 of this Statement.

3.7 CONSISTENCY WITH PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, GUIDELINES FOR PLANNING AUTHORITIES (2009)

By reference to the most up-to-date CFRAM data from the OPW data ***the proposed development site is not located within an area of flood risk.***

Notwithstanding the site's location outside a flood risk area, the proposed development site has been subject to a Flood Risk Assessment (FRA) by Waterman Moylan Consulting Engineers. The FRA was undertaken in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and with reference to the most up-to-date flood information data from the OPW. Please refer to the Flood Risk Assessment by Waterman Moylan Consulting Engineers enclosed under separate cover.

3.8 OTHER RELEVANT NATIONAL GUIDELINES – FRAMEWORK AND PRINCIPLES FOR THE PROTECTION OF THE ARCHAEOLOGICAL HERITAGE DEPARTMENT OF ARTS, HERITAGE, GAELTACHT AND THE ISLANDS 1999.

This document sets out the basic principles of national policy on the protection of the archaeological heritage and is directed, in particular, at those undertaking or authorizing development. By promoting full consideration of the archaeological heritage in the development process it seeks to avoid unnecessary and damaging conflict between protection of the archaeological heritage and development.

The application site has been thoroughly assessed with regard to potential archaeological heritage. ACSU undertook a desk top assessment at pre-application stage which was submitted with the pre-application enquiry package. The Department of Culture, Heritage and the Gaeltacht made a submission on case ABP 302215-18 acknowledging the archaeological assessment and requesting that a further archaeological impact assessment be submitted with the final SHD planning application. As per the submission by the Department, a geophysical survey was undertaken and test trenches were excavated at locations chosen by the archaeologist having considered the results of the geophysical survey within the development area. Testing revealed the presence of an enclosure. A license (19E0433) for this work has been granted by the National Monuments Service.