

# **Planning Report & Statement of Consistency with Planning Policy**

*In respect of*

## **Proposed Strategic Housing Development at Colp West, Drogheda, Co Meath**

*Prepared for*

**Shannon Homes Drogheda Ltd**

*Prepared by*

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**TABLE OF CONTENTS – TO BE UPDATED**

<b><u>Section No.</u></b>	<b><u>Section Title</u></b>	<b><u>Page Number</u></b>
1.0	Introduction	3
2.0	Site Context and Description	8
3.0	Relevant Planning History	11
4.0	Pre-Application Consultation	16
5.0	Description of the Proposed Development	17
6.0	Consistency with National and Regional Planning Policy	29
7.0	Consistency with Local Planning Policy	41
9.0	Part V	56
10.0	Conclusion	56

## 1.0 INTRODUCTION

- 1.1 On behalf of the applicant, Shannon Homes Drogheda, this Planning Report and Statement of Consistency has been prepared to accompany an application to An Bord Pleanála in relation to a proposed Strategic Housing Development (SHD) located on lands at Colp West, Drogheda, Co Meath. The application site is located to the north of the permitted commercial and road infrastructure development approved by Meath County Council under Reg Ref.: LB 180620 which provided for the construction of an office / commercial building and road infrastructure which will be utilised to serve the proposed development.
- 1.2 This planning application is accompanied by a comprehensive range of documentation which specifically seeks to address the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended), the Planning and Development (Strategic Housing Development) Regulations 2017, and the requirements of the County Development Plan and Local Area Plan.
- 1.3 The proposed development comprises of 357 no. residential units and a childcare facility on a site of c. 13.44 hectares at Colp West, Drogheda, Co Meath.
- 1.4 Drogheda is considered to be an appropriate location for residential development such as the proposed SHD, due to a number of strategic and locational factors including;
- Rebuilding Ireland – The Government’s Action Plan on Housing and Homelessness supports the need for residential development such as that proposed on sites within existing urban areas,
  - Drogheda’s status as a regional centre in the National Planning Framework – Ireland 2040,
  - Drogheda’s strategic location on the Dublin-Belfast economic corridor and the cross border network of Drogheda-Dundalk-Newry,
  - Drogheda’s status as a Regional Growth Centre within the Regional Spatial & Economic Strategy for the Eastern and Midlands Region and status as the only regional growth centre within the hinterland area of the GDA,
  - Drogheda Environs is identified as a Large Growth Town 1 within the Meath County Development Plan, and sits alongside Navan at the top of Meath’s settlement hierarchy,
  - Drogheda’s strong town centre, its capacity in terms of services and infrastructure, and its capacity in terms of social facilities and amenities,
  - Drogheda’s significant potential for employment growth, which can transpire concurrently with sustainable, compact residential growth,
  - The town is well served by public transport including rail transport and public and private bus services.
- 1.5 The proposed site is considered an appropriate site for new residential development given its land use zoning for new residential development, its proximity to existing and planned employment and retail development (Southgate Centre, permitted commercial building) and social and community infrastructure (Drogheda Grammar School, Le Cheile Educate Together National School, Gaelscoil an Bhradain Feasa, permitted temporary school), it’s proximity to public transport including rail, public bus services and private bus services, the sites location contiguous to the existing built form of

Drogheda and existing residential developments, the permitted and proposed developments to the north west of the Mill Road/Marsh Road area.

- 1.6 The final proposed strategic housing development consists of 357 residential units, (comprising of 169 no. houses, 52 no. duplex units, and 136 no. apartments), a childcare facility, public open space including a linear park and all associated site development works.

#### **Release of Phase 2 lands and Order of Priority**

- 1.7 The proposed site is zoned as A2 “New Residential”. The A2 zoning has an objective to *‘provide for new residential communities with ancillary community facilities, neighbourhood facilities and employment uses as considered appropriate for the status of the centre in the Settlement Hierarchy’*.
- 1.8 The lands are subject to a separate phasing objective, *‘Residential Phase II Post 2019’* under the Meath County Development Plan 2013-2019.
- 1.9 The Statement of Response to the Board’s Opinion submitted herewith sets out the planning rationale and justification for bringing forward a strategic housing development on the subject site which is included within Phase II (post 2019) in the Meath County Development Plan 2013-2019. Section 7 includes a summary of analysis of the Phase I residential lands within Drogheda and their delivery performance to date. It is considered, based on this analysis, that the existing Phase I lands have failed to deliver the targets set out in the core strategy. Please refer to the Statement of Response document for a full detailed analysis of the delivery performance of Phase I zoned lands in Drogheda thus far.
- 1.10 Having regard to the objectives of Rebuilding Ireland, the NPF and the RSES, and in light of the ongoing under supply of housing and rising housing need it is considered appropriate, in the interest of timely housing delivery, to bring forward a comprehensive, masterplan led, high quality residential development on these Phase II lands, which are subject to an A2 zoning objective that provides for residential development and which are proposed to be developed post 2019.
- 1.11 In the event that the Board consider the proposal to constitute a material contravention of the Phase II phasing objective, the current application is accompanied by a Material Contravention Statement which sets out a concise justification for such a contravention. The development of Phase II post 2019 residential lands is considered justifiable in this instance given the following;
- Drogheda’s status as referred to above in the NPF, the RSES and the County Development Plan,
  - The lack of development of current Phase 1 zoned lands and significant shortfall in the delivery of housing compared to the targeted growth figures set out in the core strategy during the lifetime of the Meath County Development Plan 2013-2019,
  - The site is in direct proximity to two schools (existing and permitted) and contributes infill residential development between the schools and the adjoining built up area to the west of the railway line, which the proposed development ties in with via the provision of a new bridge, providing for cycle and pedestrian linkages with the existing built up area of the town,

- The subject lands are zoned residential and are in the ownership of a housebuilding company with a proven track record of delivery both locally and nationally,
  - The delay in the publishing of a new Development Plan arising from regulations linked to the timing of the RSES. The Development Plan is now out of date, while housing needs still must be met.
  - The current housing shortage in which residential developments of scale can be considered to be of strategic and national importance,
  - The permitted commercial/employment development (providing a total GFA of 11,205 sq.m.) and permitted road infrastructure serving the proposed site and recent permissions granted in the area,
  - Local and national ABP precedents in relation to the approval of development on Phase II lands,
  - The location and characteristics of the proposed site and its proximity to services as outlined in detail within this Planning Report and Statement of Consistency,
  - The lands will be developed post-2019 in any event, given the timing of this application, and the Planning Authority have indicated their intention that the subject lands will be made available for short term housing delivery under the forthcoming new Development Plan,
  - The Board is respectfully requested to consider the new draft Meath Development Plan, which is due to be published in late 2019, and the revised phasing proposals therein.
- 1.12 It is considered, based on the analysis undertaken of the Phase 1 lands in Drogheda and their poor delivery performance to date (as illustrated in Appendix 1 and 2 of this report) the enhanced status of Drogheda in national and regional planning policy, the site characteristics and permitted infrastructure serving the proposed site, and the intended development of the site post 2019, that the release of Phase II lands (Post 2019) is justified in this instance.
- 1.13 It is considered that readily developable sites, such as the subject site which is sequential and contiguous to the developed footprint of Drogheda, should be brought forward if Drogheda's potential as a Regional Growth Centre is to be realised.
- 1.14 Notwithstanding the strong justification provided for the development of these Phase II lands at this time, the current SHD application is accompanied by a material contravention statement on timing and phasing.

#### **Urban Design Framework Plan**

- 1.15 The proposed site is located within the Mill Road/Marsh Road area. Policy Objective MMA1 of the Local Area Plan for the Southern Environs of Drogheda 2009-2015 states that the Mill Road/ Marsh Road Area '*shall be developed in accordance with an approved Urban Design Framework Plan to safeguard the proper and sustainable development of the area*'. An Urban Design Framework Plan (UDFP) has been prepared for the Mill Road/Marsh Road area encompassing the subject site, in accordance with the requirements of the Southern Environs of Drogheda Local Area Plan. The Urban Design Framework Plan (UDFP) for the Mill Road/Marsh Road area was approved by Meath County Council on the 22<sup>nd</sup> of January 2018. The Urban

Design Framework Plan and a letter from Meath County Council confirming the validation and approval of the Urban Design Framework Plan accompanies this application for information purposes. The UDFP is not a statutory development plan, but rather a high level guidance document to provide guidance for the potential future development of the area. The County Development Plan still sets the statutory framework for future development consent in the area. The Framework Plan is not binding on landowners or planning applications within its area.

- 1.16 The purpose of the framework plan was to set out a vision and framework for the mixed use development of the lands at Mill Road/Marsh Road. The UDFP acts as a framework for the development of the lands ensuring the delivery of a high quality mixed use development including areas of residential, enterprise and employment, recreational/amenity areas and social, community and educational facilities.
- 1.17 This Urban Design Framework Plan sets out indicative and non-binding parameters for the future development of the Mill Road/Marsh Road Area Lands, having regard to the existing planning policy framework and specific policies and objectives for the UDFP set out in the Local Area Plan for the Southern Environs of Drogheda which applies to the area in addition to the Meath County Development Plan.
- 1.18 The vision for the overall lands *'is for a vibrant sustainable mixed-use urban quarter which is well connected to public transport particularly Drogheda Train Station and community infrastructure, is accessible from Drogheda Town Centre, the Southern Environs and the wider hinterland of East Meath, and provides a high quality residential and employment environment to deliver on the significant economic development and employment potential of the area'*.
- 1.19 The framework plan lands were divided up into 17 development areas for the purposes of the Urban Design Framework Plan, according to location, zoning, characteristics and potential for development. The proposed development is located within Development Area 5 and builds upon the design parameters set out by the UDFP for the Development Area.
- 1.20 The UDFP provides guidance on the key transportation and movement proposals for the framework plan lands including the new link street through the framework plan lands linking Colpe Road with Marsh Road. The framework plan notes that the proposed link street will connect the plan area to the road network north and south and provide for internal movement within the area, with a link off this street connecting to the train station to the west, and the proposed neighbourhood centre located at the intersection of these two routes. The UDFP states that a segregated cycle link provided from the Mill Road/Marsh Road Area to Drogheda train station will be provided in line with Objective DE7 of the LAP.
- 1.21 The UDFP emerged following a series of meetings with Meath County Council dating back to 2013 and engagement with the landowners within the framework plan area. The proposed strategic housing development located within the defined Mill Road/Marsh Road Area has been progressed in accordance with the approved Urban Design Framework Plan.
- 1.22 A copy of the UDFP, an associated Economics Report, Transport Study, and associated approval letters from MCC are submitted herewith for information purposes.

### **Masterplan**

- 1.23 A masterplan which accords with the principles of the framework plan area has been prepared and accompanies this planning application. The masterplan has been prepared by JSA and DDA Architects, in association with the design team, and is a

non-statutory and non-binding document. Rather, the masterplan seeks to illustrate how the proposed development could fit in with the possible future development of the surrounding area, subject to separate potential future planning applications by others.

- 1.24 The masterplan builds upon the high level guidance set out in the Urban Design Framework Plan to provide a coherent structure and layout to illustrate the potential future growth and development of individual land parcels within the Mill Road/Marsh Road area. The masterplan is intended to be illustrative and is submitted for information purposes, the development of other land parcels outside of the current SHD site will be subject to separate potential future planning applications, and will be subject to Environmental Impact Assessment and Appropriate Assessment as necessary. This masterplan does not set the framework for development consent in the area and is not binding on the development of the wider area.
- 1.25 The formulation of the Masterplan has had regard to the guiding principles set out in the UDFP, the context of the Mill Road/Marsh Road lands and relationship to the wider urban context, the existing site characteristics and the existing and permitted land uses including the permitted commercial development and road infrastructure. The masterplan document submitted herewith also has regard to and responds to the points raised by the Board and the Planning Authority during the course of the pre-application process.
- 1.26 The masterplan provides guidance on and illustrates the potential future urban form and layout of the Mill Road/Marsh Road lands including guidance on layout, block form, height and density and aims to ensure that the future development of these lands is integrated into the existing context of Drogheda's built form and developed in a co-ordinated manner.
- 1.27 The masterplan demonstrates how the overall Mill Road/Marsh Road area could be integrated into the built form of Drogheda and provides for connectivity and linkages to the urban centre of Drogheda and key social and community facilities in the surrounding area, including the Southgate Centre and a number of schools in the area, and also to important focal points within the masterplan area such as the future neighbourhood centre north of the central park (amenity space).
- 1.28 It is considered that the proposed development, as the first phase of residential development within the framework plan area/masterplan area will set a high standard or threshold in terms of design quality and residential amenity for the future phases of development. The principles of integration, permeability, green corridors, linkages to surrounding land uses etc. as established by the UDFP, the masterplan and this proposed residential development will help to ensure successful place making for this new urban quarter of Drogheda.

### **The Developer**

- 1.29 Shannon Homes Drogheda Ltd is a development company with over 40 years of experience in property development. Having completed over 1,200 units in the last two decades the company has an excellent track record in building quality homes in award winning developments.
- 1.30 Shannon Homes is currently building on a number of residential sites along the east coast, predominantly in the North east (Drogheda & Dundalk) but also in North Dublin and in Meath. The last major development by Shannon Homes Drogheda was the award-winning Grange Rath development. The development consisted of 1,000 mixed type residential units encompassing architecturally designed homes, high end finishes and mature landscaping throughout.

- 1.31 The final phase of the Grange Rath development was the Southgate commercial centre, which consisted of 190,000 sq. ft of mixed use commercial and residential units. The Southgate centre currently accommodates the employment of hundreds of people in the area. Major contributors to that employment are by Coca-Cola's International Euro Asia HQ, Dunnes Stores 60,000 sq. ft flagship store and the 32 ancillary companies located at Southgate.

## **2.0 SITE CONTEXT AND DESCRIPTION**

### **Strategic Context**

- 2.1 The subject site is strategically located along the Dublin-Belfast Corridor, southeast of Drogheda Town Centre, adjacent to the Belfast – Dublin rail line, and within a 30-minute drive of Dublin Airport. MacBride railway station is located approximately 2.2km north west of the subject site.

### **The Subject Site**

- 2.2 The subject site is located on zoned lands at Colp West, Drogheda, Co Meath approximately 2.9km south east of Drogheda Town, 2 km south east of Drogheda (MacBride) railway station and approximately 1.3km south of the Boyne River.
- 2.3 The subject site is currently greenfield in nature with an undulating topography.
- 2.4 The site is located north of Colpe Road and to the west of Mill Road and Gaelscoil an Bhradain Feasa and is bordered to the south west by the Dublin-Belfast railway line. The site is located northwest of the permitted commercial development at Colpe Road Reg Ref: LB/180620 which included road infrastructure and site services including water supply, foul drainage and surface water drainage, as per Figure 2.1 below. The lands are predominantly greenfield agricultural lands. The application site area is c. 13.44 hectares.
- 2.5 The site also takes in portions of Mill Road and Colpe Road, to provide for road improvements and water upgrades. A portion of the site traverses the railway line and takes in lands within the existing Grangerath development (this element relates to the provision of a new pedestrian and cycle link).





**Figure 2.1: Location and Context of the Subject Site**

### Surrounding Context

- 2.6 To the south-west of the subject site lies the Grange Rath residential development, and beyond that the Southgate Centre which provides significant employment, retail and leisure facilities. As is set out below, the proposed development includes the provision of an important new pedestrian and cycle link across the railway line, thereby linking the proposed development with the adjacent and contiguous residential area on the western side of the rail line, and providing for a high quality pedestrian route to link with the Southgate Centre.



**Figure 2.2: View of Southgate Centre**

- 2.7 The facilities and amenities within the Southgate Centre include several cafés and restaurants, food stores (including specialist food stores), a large Dunnes Stores supermarket and clothing store, barbers, clothes stores.



**Figure 2.3: Internal view of the mall of Southgate Centre**

- 2.8 There are a number of existing schools in the area surrounding the subject site, including Gaelscoil an Bhradain Feasa (adjacent to the subject site). Le Cheile Educate Together National School, and Drogheda Grammar School. There is a recent permission for a further temporary secondary school at Mill Road, adjacent to the subject site. That temporary school will be replaced with a permanent school in the immediate vicinity of the subject site in due course.
- 2.9 The planning permission for the adjacent Gaelscoil an Bhradain Feasa provides for a new linkage with the link street proposed as part of the current application, thereby integrating this school with the development. This proposed development will provide significantly improved access to this school.



**Figure 2.4: View of Gaelscoil an Bhradain Feasa from Mill Road**

### **3.0 RELEVANT PLANNING HISTORY**

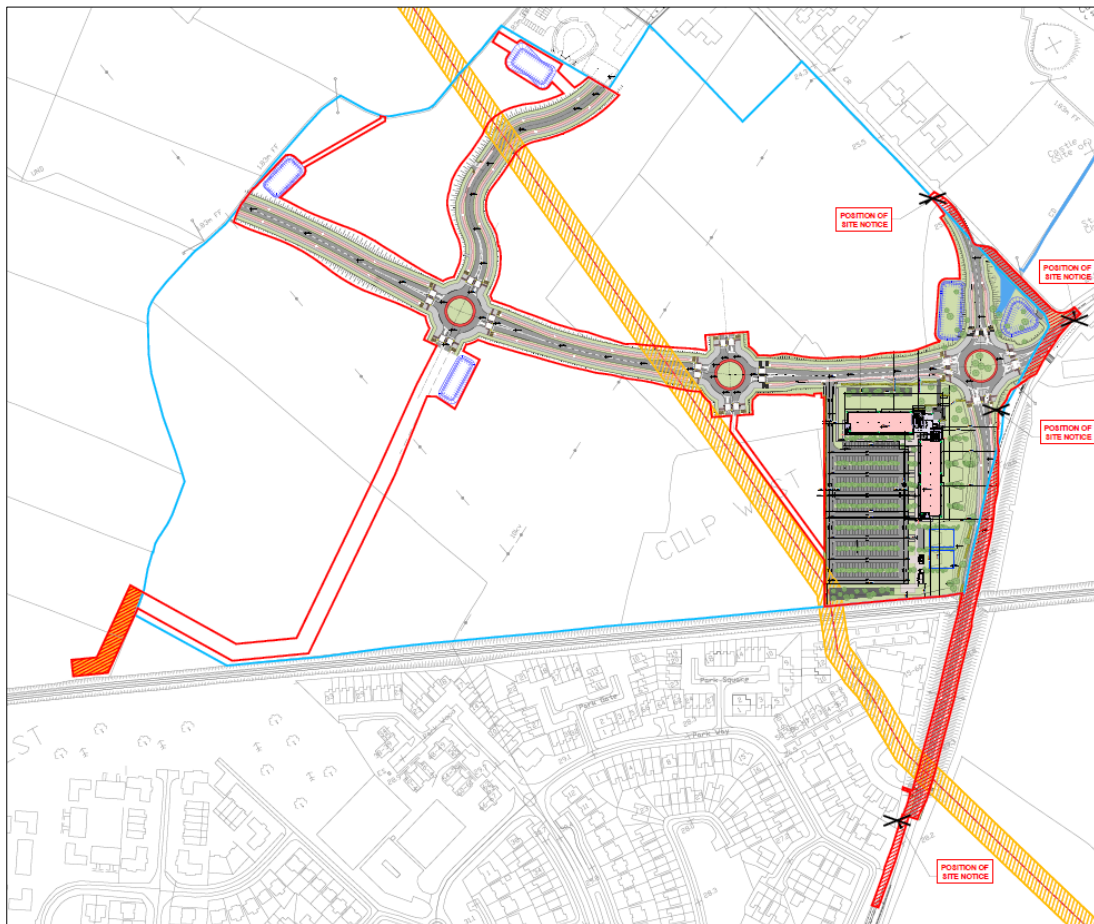
- 3.1 As part of the planning history analysis undertaken in respect of the proposed development, a review was undertaken of current / recent permissions on lands within the Southern Environs of Drogheda zoned for Phase 1 residential development in the Meath County Development Plan 2013-2019, and of Phase 1 residential development in Drogheda and North Drogheda Environs. A summary of these permissions is provided within the Statement of Response which deals with matters pertaining to timing and phasing of development, as raised in the Board's Opinion.
- 3.2 This section sets out the relevant planning history of the subject site, and adjacent and proximate lands.

#### **Subject Site**

##### Meath County Council Reg. Ref.: LB/180620 – Commercial Development

- 3.3 A ten year permission for a commercial development at Colpe Road, Colpe West, Drogheda, Co. Meath was granted on the 4/9/2018. The site is located north of Colpe Road and to the west of Mill Road and is bordered to the south west by the Dublin-Belfast railway.
- 3.4 The proposed development consisted of the demolition of the existing habitable house and construction of 1 no. 4 storey office building consisting of 2 no. blocks with a shared corner entrance/reception area and a screened plant area, solar panels and equipment at roof level, providing a total GFA of 11,205 sq.m. The road infrastructure permitted includes a link street approximately 640m in length, including 3 no. roundabout junctions, and 230m long connection of the link street to the east to facilitate a connection to the existing school on Mill Road (Gaelscoil an Bhradain Feasa). The

area of the permitted road infrastructure has been included within the current SHD application, and the alternate road design now proposed will supersede that which is permitted and partially implemented.



**Figure 3.1: Reg Ref: LB/180620 - Permitted commercial development and associated road infrastructure**

Meath County Council Reg. Ref.: Sa900622 & ABP Reference: PL 17. 235818

- 3.5 On the 15<sup>th</sup> of October 2010, permission was refused by An Bord Pleanála for the following development:
- “Construction of a road of total overall linear length approximately 1550m and width of 19.3m, containing 2 traffic lanes, with grass margins, footpaths, cycle tracks and junctions including roundabouts. The road connects the Marsh Road (R150) with Colp Road (L-1611-0-formerly CR330). The development also provides for associated site development works including surface water drainage, watermains, utilities, street lighting, road signage and markings, demolition of existing farm buildings, culverting of section of Stameen River over a length of 22 m and landscaping.”*
- 3.6 The road proposed in this application would have constituted the entire link road, a portion of which now forms part of the current SHD application. The Board’s reasons for refusal centred on the lack of an approved Urban Framework Plan, and concerns that the proposal has not been subject to Appropriate Assessment.
- 3.7 These previous reasons for refusal are not applicable to the current SHD proposal. There is now an agreed Urban Development Framework Plan for the subject site and adjoining lands, and a Natura Impact Statement is submitted as part of the current

application. The proposed development will be subject to Stage 2 Appropriate Assessment.

### **Surrounding Area**

#### Meath County Council Reg. Ref.: SA130927 & ABP Reference: PL17.243331. – New Primary School

- 3.8 Planning permission was granted with modifications on the 18/08/2014 by An Bord Pleanála following a third party appeal for the following;

*'Removal of all existing temporary school buildings, construction of a new two storey primary school comprising of 16 classrooms, 4 resource rooms, 1 general purpose hall, 1 base classroom special needs unit and ancillary accommodation, all associated external works including provision of vehicular entrance from the Mill Road and provision for future access from the proposed new Mill Road/Marsh Road link road the west, internal bus set-down and all footpaths, staff car parking, cycle parking, 2 no. ball courts, 1 junior play area, 1 soft play area, proprietary wastewater system, storm drainage system, landscaping and boundary treatments'.*

- 3.9 It is noted that the development as permitted allows for future access from the proposed new Mill Road/Marsh Road link road to the west, which the proposed development now seeks to realise. It is also noted that Condition No.3 of ABP Reference: PL17.243331 states;

*'3. (a) The route of the potential future access road within the site, shown on drawing C-005 revision PL1, submitted to the planning authority on the 2nd day of December 2013, shall be kept free from development and shall be reserved for this road.*

*(b) When the Mill Road/Marsh Road Link Road has been constructed, vehicular access to such Road shall be provided to the south-western boundary of the site by such future access road, together with revised set down area, to details to be agreed with the planning authority at that time. When the school is connected to the Link Road, the existing vehicular access to Mill Road shall be permanently closed.*

*Reason: In the interests of orderly development and to ensure that access from the proposed Mill Road/Marsh Road Link Road can be effected in the future, in accordance with the provisions of the Local Area Plan'*

#### Meath County Council Reg. Ref.: LB190739 – Temporary Secondary School

- 3.10 On the 31<sup>st</sup> of July 2019, a decision to grant permission was issued by the Planning Authority for the following development on a site to the southeast of the main SHD site. The development was described as follows:

*"The provision of a temporary post primary school by way of construction of 3no. prefabricated buildings (c 190 Sq. Mtrs 239 Sq. Mtrs & 469 Sq.Mtrs) on a defined site area (c. 0.643Ha) to be enclosed within a 2mtrs high welded mesh fencing and access gates with associated site works including provision of new site entrance onto new road as granted planning permission under Planning Ref LB 180620, short term temporary entrance onto Mill Road, car parking, drop off area and hard surface play area, wastewater treatment system and associated percolation area. Temporary permission for a period no longer than 5 years is being sought."*

- 3.11 This temporary secondary school provides for a new access onto the link road as permitted under Planning Ref. LB 180620, which is partially implemented at present. As set out in further detail herein, the area of the permitted roadway is included in the

current SHD application, and the revised road proposal will supersede the partially implemented permitted roadway.

### Louth County Council Reg. Ref.: 17387 – Residential Development

- 3.12 On the 7<sup>th</sup> of August 2017, a final grant of permission was issued by Louth County Council on lands at Marsh Road , Newtown , Lagavooren, Drogheda, for a residential development comprising of the following:

*“Permission for development to consist of the construction of a total of 133 no. two storey residential dwellings in a mix of detached, semi-detached and terraced form. Vehicular access is from the Marsh Road (R150). The development also provides for all associated site development works including alterations to ground levels, internal roads, car-parking, footpaths, open space, public lighting, landscaping and boundary treatments. The application site was previously granted planning permission under ref. no. 06/52 for 260 no. residential units.”*



**Figure 3.2: Extract from site layout plan of Reg. Ref.: 17387**

### An Bord Pleanála Reg. Ref.: 305110 – Current SHD Application at Marsh Road

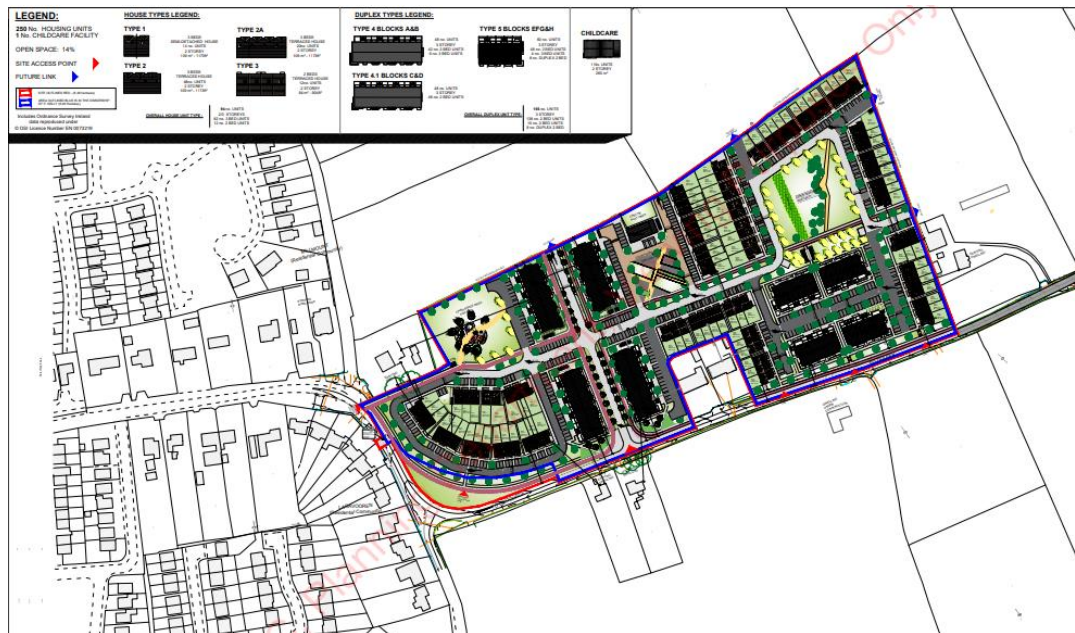
- 3.13 An application for a Strategic Housing Development on a site at Newtown, Marsh Road & McGraths Lane Railway Terrace, Drogheda (to the northwest of the subject site, adjacent to the railway station) is currently under consideration by An Bord Pleanála. The development comprises *inter alia* 450. no residential units (81 no. houses and 369 no. apartments), creche and associated site works.



**Figure 3.3: Extract from PCOT Architects site layout plan submitted as part of Reg. Ref.: 305110**

An Bord Pleanála Reg. Ref.: ABP-3037899-19- Approved SHD at Bryanstown

- 3.14 On the 10<sup>th</sup> of June 2019, permission was granted for a Strategic Housing Development at Bryanstown, within the southern environs of Drogheda. The approved development comprises 250 no. dwelling units (94 no. houses, 156 no. duplex/apartments), creche and associated site works.
- 3.15 This recent approval for a Strategic Housing Development provides a direct precedent for the granting of permission for residential development on lands within the Southern Environs of Drogheda which are subject to a Phase 2 / post 2019 phasing objective under the County Development Plan.



**Figure 3.4: Extract from site layout plan from the Bryanstown SHD**

#### **4.0 PRE-APPLICATION CONSULTATION**

- 4.1 A pre-application meeting under Section 247 of the Planning and Development Act was undertaken with the Planning Authority, Meath County Council (MCC), and a tripartite meeting was held with ABP and MCC in advance of this planning application submission to An Bord Pleanála.
- 4.2 The proposed development is the product of an iterative process which has taken full account of, and responded to, the issues and points raised during the pre-application consultation meeting with the Planning Authority, and the tri-partite meeting with ABP and MCC. Further detail and responses to pertinent points raised during the pre-application stage are provided within the Statement of Response documentation submitted herewith.

##### **Section 247 Pre-Application Meeting**

- 4.3 A formal pre-application meeting was held at the offices of Meath County Council on the 3<sup>rd</sup> of October 2018. The main issues discussed at the formal pre-application meeting with the Planning Authority are set out below.
- Land Ownership
  - Core Strategy & Release of Phase 2 lands
  - Sense of Place and Linkages to town and transport modes
  - Water / Waste Water / Surface Water Infrastructure
  - Part V
  - Architectural Conservation issues
  - Urban Design
  - Open Space
  - Location of childcare facility
  - Traffic and Transport
  - Parking provision
  - Environmental Waste issues
  - Bin Storage
  - Ecology



- 4.4 It is considered that the comprehensive suite of documents submitted with this planning application address the matters raised by Meath County Council at the Section 247 meeting.

#### **Tri-Partite Meeting**

- 4.5 The tri-partite meeting was held at the offices of An Bord Pleanála on the 4<sup>th</sup> of February 2019, and was followed by the issuing of the Board's Opinion on the pre-application stage.
- 4.6 It is considered that the items raised in the Board Opinion are thoroughly addressed in the accompanying submission documents including the Statement of Response, , Masterplan, Architectural Design Statement, Landscape Design Rationale Report and the EIAR.

### **5.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT**

- 5.1 The proposed development consists of a residential development comprising of 357 no. residential units, a childcare facility and associated playground, road infrastructure, a pedestrian bridge over the railway line, all associated open space, cycle and pedestrian infrastructure, services and all other associated development on a site of c. 13.44 hectares at Colp West, Drogheda, Co Meath.
- 5.2 The road infrastructure (partially implemented under Reg. Ref.: Reg Ref: LB/180620) includes a link street approximately 640m in length, including bus bays, 1 no. roundabout, pedestrian crossings and 230m long connection of the link street to the east to facilitate a connection to the existing school on Mill Road (Gaelscoil an Bhradáin Feasa). The road infrastructure also includes the realignment of a section of Colpe Road and the realignment of the southern section of Mill Road, and includes proposed cycle lanes/paths, footpaths, grass verge, and the provision of a footpath and cyclepath / cycle lane on Colpe Road to tie-in with the existing shared footpath / cyclepath, to the south-west of the railway line.
- 5.3 The proposed new pedestrian and cycle bridge will cross the existing Belfast to Dublin railway line and will link the proposed SHD development to the existing Grangerath housing development to the south-west.
- 5.4 The development includes associated site and infrastructural works including all associated road infrastructure, foul and surface / storm water drainage, surface water management including attenuation and storage features, a temporary pumping station, watermains and utilities, 592 no. car parking spaces, cycle parking spaces, c. 1.35 ha of public open space including a linear park, bin and bike stores, substations, landscaping consisting of new tree planting, hedges, berms and grass planting, boundary treatments, public lighting, bin stores and all associated site and infrastructural works.
- 5.5 The building heights proposed within the development will also vary, ensuring a visually engaging, high quality residential environment will result, including two and three storey houses and 3-6 storey apartment / duplex buildings. The proposed scheme will provide variety in its design via the use of varying unit designs and types, all of which will be completed using a palette of high-quality building materials and interspersed with high quality public realm, landscaping and open space.
- 5.6 The development will be arranged as a series of distinctive character areas, defined by varying housing types, densities and layouts. This will ensure that the scheme is legible, memorable and easy to navigate for future residents and visitors alike. The

scheme will benefit from a high standard of architectural design, and a similarly high calibre landscape design, which will be undertaken by Dermot Foley Landscape Architects.



**Figure 5.1: Extract from DDA Site Layout Plan**

### **SHD DETAILS**

- 5.12 Having regard to the requirements of Section 16 of the application form, the following provides a useful summary of key aspects of the proposed scheme.

#### **Residential Units and Housing Mix**

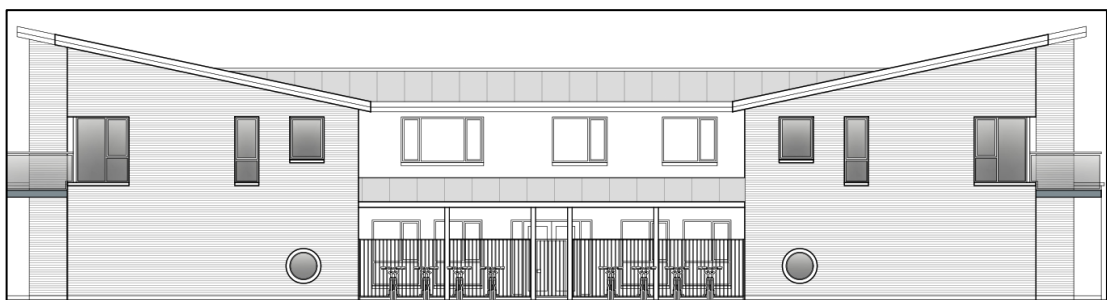
- 5.7 A broad mixture of unit types and sizes will be provided for within the proposed scheme, ensuring the attractiveness of this new residential area for a wide variety of household sizes and types. The inclusion of varying housing types, including two storey houses, duplex units and apartments will also provide the possibility of upgrading and downsizing within the development, ensuring that the development will cater for future demographic changes among its future residents.
- 5.8 The 357 no. residential units proposed consist of 169 no. houses, 52 no. duplex units and 136 no. apartments.
- 5.9 The 169 no. houses will consist of the following:
- 104 no. 3 bedroom units
  - 65 no. 4 bedroom units
- 5.10 The 136 no. apartment units will consist of the following:
- 58 no. 1 bedroom units
  - 78no. 2 bedroom units

- 5.11 The 52 no. duplex units will consist of the following:
- 52 no. 3 bedroom units
- 5.12 Each of the proposed house types demonstrate a considered architectural approach, and the scheme as a whole will benefit from a sense of visual rhythm and interest, based on the variation of house types and layouts throughout. Units local to Public Open Space will incorporate windows facing the Open Space to provide passive surveillance.
- 5.13 The following table provides a detailed breakdown of the broad range of housing types proposed and sets out the percentage of the overall unit number which each housing type comprises.

<b>Breakdown of Unit Mix – Absolute Figures and Percentage</b>			
<b>HOUSES</b>			
<b>Unit Type</b>	<b>Total No.</b>	<b>Percentage of Houses (169 Total) - Rounded</b>	<b>Percentage of Overall Unit No. - Rounded</b>
3 – Bedroom	104	62%	29%
4 – Bedroom	65	38%	18%
<b>DUPLEX UNITS</b>			
<b>Unit Type</b>	<b>Total No.</b>	<b>Percentage of Duplex Units (52 Total) – Excludes the apartments located above the duplex units.</b>	<b>Percentage of Overall Unit No. - Rounded</b>
3 – Bedroom	52	100%	15%
<b>APARTMENTS</b>			
<b>Unit Type</b>	<b>Total No.</b>	<b>Percentage of Apartments (136 Total) - Rounded</b>	<b>Percentage of Overall Unit No. – Rounded</b>
1 – Bedroom	58	43%	16%
2 – Bedroom	78	57%	22%

- 5.14 The above table demonstrates the broad mix of unit types and sizes within the scheme, which provides a range of accommodation types, sizes and layouts to suit varying family sizes, and to accommodate up-sizing or down-sizing within the scheme.

### **Childcare Facility**



**Figure 5.2: Proposed Childcare facility**

- 5.15 The proposed childcare facility is a two storey building with a GFA of 439 sq.m located to the east of the Link street. The upper storey contains apartments which provide passive surveillance of the open space to the east.

**Density**

- 5.13 The scheme proposes a net density of c. 39 units to the hectare, based on a net development area of 9.07 ha calculated in accordance with the guidance set down in the Sustainable Residential Development Guidelines. Please refer to the Design Statement and Drawing No. 19-001-P-1.016 – Site Density prepared by DDA Architects which illustrates how the net site area and net density figure has been calculated.
- 5.14 The proposed residential density accords with the outer-suburban greenfield nature of the subject site, which is situated in a Large Growth Town. The Guidelines for Sustainable Residential Development in Urban Areas (2009) provide guidance on the appropriate level of residential density for such sites, with a net residential density of 35-50 units per hectare recommended, and not less than 30 units per hectare.

**Plot Ratio and Site Coverage**

- 5.15 The proposed development has an overall plot ratio of 0.28 and site coverage of 14.2%. The above are considered appropriate for the site and result in an appropriate form of development

**Building Heights**

- 5.16 The proposed houses are 2 and 3 storeys in height and the 7 no. duplex/apartment blocks are 3 - 6 storeys in height. The childcare facility building is 2 storeys in height.
- 5.17 These heights are in accordance with the guidance set out within the 2018 Building Height Guidelines, which espouse the provision of a mix of building heights within new suburban / outer urban schemes, in order to achieve sustainable densities and to avoid the monotony of repetitive low-rise traditional housing estates. The distribution and variety of heights within the scheme has been carefully considered in order to optimise the legibility of the scheme, and to provide an appropriate urban edge onto the link street which runs through the proposed development from north to south.



**Figure 5.3: Strong urban edges are provided to the link street**

**Proposed Layout and Design**

- 5.16 A broad mixture of unit types and sizes will be provided for within the proposed scheme, ensuring the attractiveness of this new residential area for a wide variety of household sizes and types. The inclusion of varying housing types, including two storey houses, duplex units, and apartments will also provide the possibility of upgrading and downsizing within the development, ensuring that the development will cater for future demographic changes among its future residents.



**Figure 5.4: Gateway apartment building, providing a sense of entry to the scheme, as viewed from the link street**

- 5.17 Each of the proposed house types demonstrate a considered architectural approach, and the scheme as a whole will benefit from a sense of visual rhythm and interest, based on the variation of house types and layouts throughout. Units local to public open space will incorporate windows facing the open space to provide passive surveillance. End gables facing public areas and open space will be enriched with additional windows, features and detailing to provide for passive surveillance.
- 5.18 Furthermore, residents of the apartment units will have access to a high standard of facilities and amenities in their immediate locality, including significant areas of landscaped open space. The apartment buildings themselves play an important role in providing for an effective urban design solution within the scheme, with attractive streetscapes and an appropriately urban sense of place – particularly along the link street through the development.



**Figure 5.5: Apartment building with landmark element, which steps up towards the link street**

- 5.19 The building heights proposed within the development will also vary, ensuring a visually engaging, high quality residential environment will result, including two and three storey houses, three and four storey duplex blocks, and 3 to 6 storey apartment buildings. The proposed scheme will avoid mundanity in its design via the use of varying unit designs and types, which will be completed using a palette of high-quality building materials and interspersed with high quality public realm, landscaping and open space.
- 5.20 The development will be arranged as a series of distinctive character areas, defined by varying housing types, densities and layouts. This will ensure that the scheme is legible, memorable and easy to navigate for future residents and visitors alike. The scheme will benefit from a high standard of architectural design, and a similarly high calibre landscape design, which will be undertaken by Dermot Foley Landscape Architects.
- 5.21 The architectural design statement prepared by DDA architects provides further details in relation to the architectural rationale for the design and layout of the proposed development.



**Figure 5.6: Rendered view of duplex building within Character Area 3**

### **Landscaping and Open Space**

- 5.22 The proposed development also includes significant areas of public open space including a linear park which has been designed to integrate into the overall masterplan area and provide a green corridor through the wider area. The total net open space to be provided within the development is 1.42 hectares. This equates to 15.7% of the site area, in accordance with the standard of 15% public open space provision set out within the Meath County Development Plan.
- 5.23 An additional area comprising 0.52 hectares of open space will be provided in the northeast of the subject site, although as this element of open space is not relied upon to achieve the required open space quantum for the scheme (as it is provided on lands zoned 'White Lands' within the Development Plan. The total gross open space area provided is 1.94 hectares if this additional open space is taken into account, or 21.43% of the overall site area.
- 5.24 The public open space is located in and around residential areas providing opportunities for informal recreation and play. There is a clear hierarchy of public open space incorporated into the overall landscape strategy, thus allowing for a diverse range of landscape and open space experience.

- 5.25 It includes the centrally located Linear Park, rectangular public open space to the west, and two smaller open spaces close to the apartment blocks. The Linear Park provides a green corridor through the site and the wider masterplan lands, providing a movement and recreation function for the wider area, facilitating future connections for both pedestrians and cyclists. The indicative masterplan submitted along with this application illustrates how the areas of open space included in the current development proposal can link with surrounding landholdings to provide for a coherent network of open spaces and recreational areas for this new quarter.



**Figure 5.7: View of the proposed centrally located linear park**

- 5.26 The Linear Park is centrally located to ensure retention of the existing hedgerow as much as possible. It is overlooked from proposed houses to the east and west. Its central location ensures that the park is activated and used to its maximum potential.
- 5.27 Please refer to the Landscape Design Report, Landscape Drawings and Sections, and Landscape Masterplan prepared by Dermot Foley Landscape Architects which is submitted herewith for further details.

### **Parking**

- 5.28 The proposed development provides for 592 car parking spaces and 532 cycle parking spaces, which have been carefully integrated into the design of the scheme, to avoid any feeling of car-domination. Please refer to the DDA Design Statement document for further details of the measures taken to integrate the parking within the development into the layout of the scheme, in accordance with the principles of the Urban Design Manual.

### **Phasing Proposals**

#### **Phase 1**

- 5.29 It is intended that the proposed development will be delivered in three phases. The phasing proposals are set out within the DDA Design Statement which is submitted herewith. A full sized phasing drawing is also provided as part of the DDA drawing pack.
- 5.30 Phase 1 will comprise the delivery of the main road infrastructure, for the proposed development (i.e. the link street), the southern portion of the linear park, and 116 no. housing units including houses and apartments. The creche in the eastern portion of

the site will also be delivered as part of the first phase of development (including the access road to the creche).

- 5.31 The first phase of development also includes the proposed bridge over the adjacent rail line. It is intended that this important piece of infrastructure will be completed prior to the occupation of units in Phase 2 of the development. This will allow for the completion of residential units within Phase 1 along the pedestrian desire line from the bridge across the subject site, and their completion in advance of the bridge becoming operational – this is considered to be important, as it will allow for passive surveillance and security on the new route through the site which the bridge will create. This new bridge will also provide for significant benefits for the residents of the existing Grangerath residential area, who will benefit from access to the significant areas of amenity space within the proposed development, and from ease of access to the two schools existing and permitted beside the SHD site.
- 5.32 The first phase of development will also include 7 no. of the 36 no. proposed Part V units.

### Phase 2

- 5.33 Phase 2 of the proposed development comprises the delivery of the remaining area of the development which is located to the west of the link street. This second phase of development will provide a further 129 residential units and will also complete the main linear park within the scheme and the western open space, to the north of the proposed new bridge.
- 5.34 The second phase of development will include a mix of houses, apartments, and duplex units which also includes 14 Part V units.

### Phase 3

- 5.35 Phase 3 will see the completion of the remaining residential units within the scheme (113 units), including the three apartment and duplex buildings which define the eastern side of the link street within the scheme. This final phase of development will see the completion of the remaining areas of open space within the scheme, to the east of the link street. This phase will also provide a mix of houses, apartments, and duplex units. The final phase of development includes the remaining 15 Part V units.

### **Connections to adjoining areas/ integration with surrounding land uses**

- 5.36 The integration of the proposed development with adjoining areas and development (both existing and future) has been central to the work undertaken by the design team to progress the design of the scheme. The layout and design of the scheme is predicated on the need to align with identified objectives for the subject site, including the delivery of the link street through the development lands, while also providing for linkages with existing development (including the adjoining school) and new routes to adjacent areas, including a new pedestrian bridge and pathway linking with development on the opposite side of the railway line.
- 5.37 The layout of the scheme also provides scope for future linkages which could be instituted based on the indicative masterplan prepared for surrounding undeveloped lands as submitted herewith.
- 5.38 The internal layout of the scheme focuses on permeability, both for residents, and for those who will traverse the development to access schools on Mill Road via the new proposed pedestrian bridge across the adjoining rail line. By providing this new linkage,



the proposed development is directly integrated with existing built up areas, including the Grangerath development to the west of the rail line. The provision of this key linkage will considerably reduce the distance one would walk or cycle from this existing significant area of residential development to access the educational facilities on Mill Road. There is a distance saving of up to 1km from some adjoining areas via the new proposed bridge – making access to these schools on foot or by bike a viable option for hundreds of residents who otherwise would likely drive.

- 5.39 Within the proposed development itself, high quality cycle and pedestrian infrastructure is provided to encourage active transit.
- 5.40 The proposed development also includes an important piece of connecting road infrastructure – the main link street – which will be delivered using an alternate design for some elements of the roadway to that which was previously granted permission under Reg. Ref.: LB/180620, and which is partially implemented under that permission. The element of the link street to be delivered as part of the Strategic Housing Development proposal will represent an important first phase in the delivery on a specific road objective of the Development Plan, which identifies the road on the zoning map for Drogheda Environs. The link street design now proposed is similar in terms of alignment and cross section to that which was previously approved. The tying in of the link street with the permitted office development, Colpe and Mill Roads, and the existing and permitted schools in the vicinity are unaffected by the updates to the road layout.

### **Transport and Accessibility**

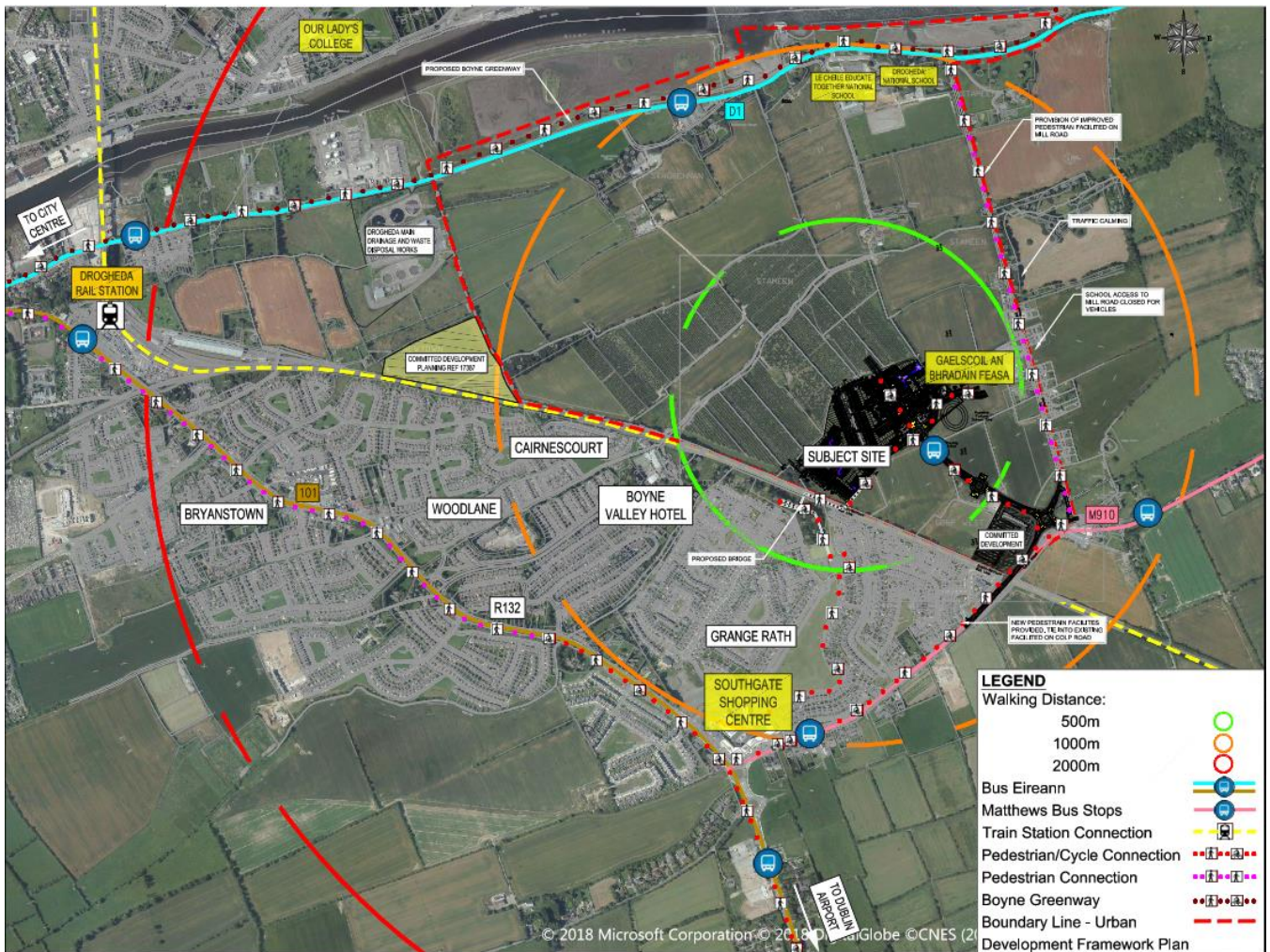
- 5.41 The primary road infrastructure/link street serving the proposed development has been permitted under Reg Ref: LB/180620 and is partially implemented. The permitted temporary school is also accessed from this link street. Notwithstanding this previous extant permission, the current SHD application includes the link street within the red line boundary, and proposes an alternate layout which removes two roundabouts from the permitted link street layout and replaces these with junction arrangements in response to comments from the Board made during the course of the pre-application consultations.
- 5.42 The SHD application takes in the link street / link road to provide access to the subject site. A roadway on this alignment was previously approved under Ref. Ref.: LB 180620, along with a significant commercial development. The roadway is partially implemented at its southern end (therefore the southern end of the link street is unchanged from the approved partially implemented development at this location). The partially implemented works are not affected by the altered road layout now proposed.
- 5.43 The SHD application takes in the footprint of this permitted roadway and proposes an alternate road layout which will supersede the previously permitted road layout, thereby addressing points raised by the Board in the pre-application opinion. The Board requested that the design of this road infrastructure be considered further, to ensure compliance with DMURS.
- 5.44 In this context, the design team have undertaken a detailed review of the design of the link road / link street along its entire extent. In this regard, the design team has had particular regard to Section 3.2.2 of DMURS, which relates to context-based design of roads and streets. Section 3.2.2 of DMURS states inter alia:

*“Urban roads and streets can traverse many areas with very different characteristics, such as industrial areas, residential areas, mixed use neighbourhoods and city, town*

*and village centres. This clearly requires different design solutions within each of these different contexts”.*

- 5.45 Based on the review of the link road undertaken by the project design team, it is recognised that the character and context of the area which the link road traverses changes as it enters the proposed housing development. In recognition of this, the revised design incorporates pedestrian crossings and omits roundabouts which were included in the previously permitted link road. The revised design for this roadway is context sensitive and site-specific and will ensure an appropriate sense of place within the proposed development, where the link street will be provided with a strongly defined urban edge and sense of enclosure by the higher elements of development along this important route.
- 5.46 Pedestrian crossings have been provided at intervals to allow for permeability across the site, considering likely desire lines so as to maximise the safety of the design for pedestrians.
- 5.47 The southern end of the link street (the part which is currently being implemented under the extant permission) is not subject to any change in the current proposal. There will therefore be no variance with any of the works which have been undertaken to date on the permitted road *vis a vis* the current proposal to address the Board's concerns. The element of the roadway currently being implemented will allow for access to the site of the permitted office building under Reg. Ref.: LB 180620, and will also provide for the linkage to the new road which is provided for in the permission for the temporary school under Ref. Ref.: LB190739.
- 5.48 The new roadway to be provided will facilitate a connection to the existing school on Mill Road (Gaelscoil an Bhradáin Feasa). The link street has been designed in accordance with the Design Manual for Urban Roads and Streets (DMURS).
- 5.49 Drogheda benefits from national, regional and local bus services as provided by private and public sector operators. Bus Eireann provides a number of services linking Drogheda with Dundalk to the north and Dublin to the south where connections can be made to further regional / national services and destinations across the country. The Bus Eireann services are supplemented by a number of private operators. A number of bus services serve the R132 with stops provided in the vicinity of Colpe Cross to the south west of the site.
- 5.50 The closest current bus services to the site is offered by the Matthews bus service which runs to and from Dublin through Laytown and Bettystown with bus stops at Donacorney church (approx. 550m from the proposed residential site), Grange Rath and Southgate Shopping Centre.
- 5.51 The Southern Drogheda Environs Local Area Plan highlights the proposal to implement a new bus route through the lands, linking the site to Drogheda Town Centre via Drogheda MacBride Train Station and Drogheda Bus Station.
- 5.52 This development proposes to provide two new bus stops (in both directions) within 50-100 metres of the southern boundary of the development site, along the proposed link street, as illustrated below in the short-term linkages plan.
- 5.53 The final development design also provides for a key new pedestrian and cycle link across the adjoining rail line, linking with the existing residential areas to the south / west and onward to the Southgate Centre. This is an important feature of the proposed development which represents a significant planning gain, both for the proposed

development and for existing areas to the southwest, which will benefit from a major increase in accessibility to the existing and planned schools adjacent to the SHD site.



**Figure 5.8: Short Term Linkages Plan (Source: DBFL Consulting Engineers)**

- 5.54 MacBride Station is accessed via Dublin Road (R132) and is situated approximately 2km from the subject lands. There are currently 32 services from Dublin to Drogheda, 10 of which extend northbound to Dundalk per weekday and 33 services travelling southbound to Dublin from MacBride Station primarily serving commuter travel requirements. MacBride Station also serves the Dublin – Dundalk services with 7 trains stopping at Drogheda in each direction per weekday.

#### Future Connections

- 5.55 The masterplan demonstrates how the overall Mill Road/Marsh Road area will be integrated into the built form of Drogheda and provides for connectivity and linkages to the urban centre of Drogheda and key social and community facilities in the surrounding area, including the Southgate Centre and a number of schools in the area, and also to important focal points within the masterplan area such as the future neighbourhood centre north of the central park (amenity space).

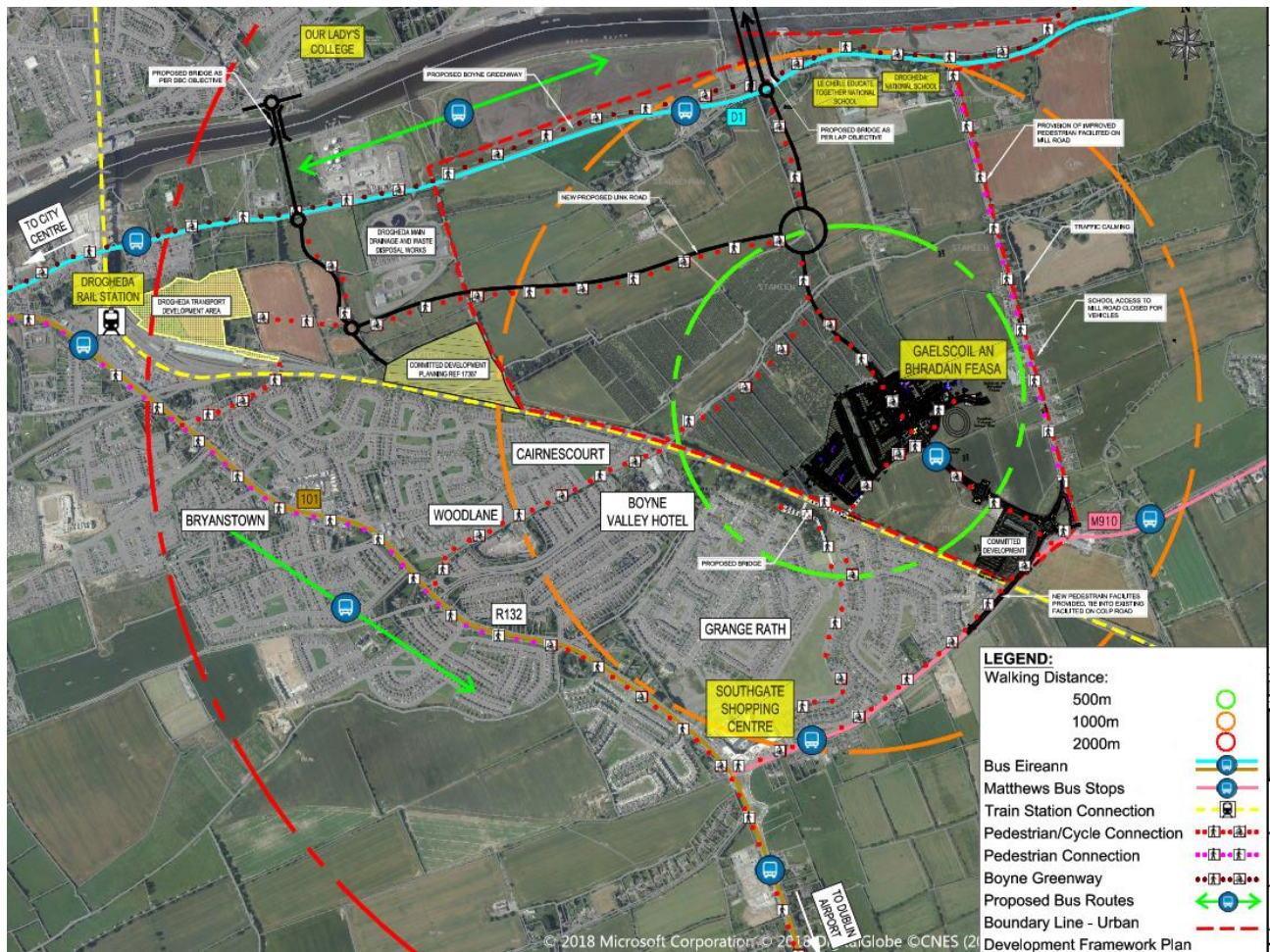


Figure 5.9: Long Term Linkages Plan (Source: DBFL Consulting Engineers)

### Waste Management

- 5.56 A Construction and Operational Waste Management Plan has been prepared by Byrne Environmental Consulting Limited (BECL) to accompany SHD application. As set out within the WMP, the recycling of waste will be maximised during the construction phase, and waste reduction initiatives will be employed.
- 5.57 A three-bin system will be employed in the proposed residential houses. Storage will also be provided within each of the proposed apartments for waste separated into general domestic waste, green recyclable waste and organic waste. Bins stores will be provided for the apartment buildings in the scheme which will be easily accessible from the apartment units and will encourage the recycling of domestic waste.

### Associated Development Works

- 5.58 The development includes all associated and ancillary works. The development incorporates a range of SUDs measures including storage tanks and detention basins. The development also incorporates water infrastructure upgrades on Mill Road, which are necessary to facilitate the proposed development.
- 5.59 The application also includes provision of a temporary marketing suite and associated signage during the construction phases of the development. A drawing of these temporary elements is included within the DDA Architects drawing pack.

## 6.0 CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

6.1 The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- National Planning Framework – Ireland 2040;
- The National Development Plan;
- Eastern and Midlands Regional Assembly Regional Spatial and Economic Strategy;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Design Standards for New Apartments (2018);
- Urban Development and Building Heights Guidelines (2018);
- Design Manual for Urban Roads and Streets (2013);
- Transport Strategy for the Greater Dublin Area;
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- The Planning System and Flood Risk Management (2009).

### **National Planning Framework – Ireland 2040**

- 6.2 The National Planning Framework was published in its final form on the 16th of February 2018 following a process of consultation. The final National Planning Framework (NPF) document incorporates significant amendments to the Draft NPF document.
- 6.3 The NPF seeks to influence the location of new housing development and future population growth, and targets the location of 40% of new housing development within and close to the existing ‘footprint’ of built up areas over the lifetime of the framework.
- 6.4 The NPF plans for growth of 490,000 to 500,000 people in the Eastern and Midlands region.
- 6.5 The NPF, under National Policy Objective 9, recognises that there is potential in each Regional Assembly Area for significant growth in some settlements (i.e. 30% or more above 2016 population levels), subject to criteria including the provision of adequate infrastructure and amenities to support such growth, and concurrent employment provision.
- 6.6 The NPF identifies Drogheda as a regional centre and recognises its strategic location on the Dublin-Belfast economic corridor and the cross border network of Drogheda-Dundalk-Newry.



**Figure 6.1: NPF Strategy Map**

- 6.7 National Policy Objective 2b states *'The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy'*.
- 6.8 National Policy Objective 4 of the NPF seeks to *"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being"*. The proposed development will constitute an urban area comprising a high standard of design and ensuring a liveable and attractive environment for future residents.
- 6.9 National Policy Objective 7 aims to *'Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on: Strengthening Ireland's overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and **Drogheda-Dundalk-Newry on the Dublin-Belfast corridor'***.
- 6.10 National Policy Objective 11 states: *'In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth'*.
- 6.11 It is considered that the proposed development provides for planned, compact and sustainable growth, via the expansion of an urban area which has strong physical and social infrastructure and potential for significant employment growth. The proposed development will provide for the phased delivery of housing over a 10-year period, which will occur concurrently with employment growth in the town, including permitted

employment provision on the lands to the south of the subject site (which are controlled by the applicant) which can be developed concurrently with the phased development of housing on the proposed SHD lands.

- 6.12 National Policy Objective 27 seeks to '*Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages*'.
- 6.13 National Policy Objective 44 states; 'In co-operation with relevant Departments in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility'.
- 6.14 The proposed development incorporates a high standard of pedestrian and cycle permeability and provides for new linkages with surrounding land uses such as schools and employment development. This will encourage cycling and walking for shorter trips, both within the proposed development and to access amenities and facilities at the Southgate Centre and Drogheda Town Centre.
- 6.15 In summary, the NPF supports the provision for planned growth at locations which are equipped to sustain such development. The NPF favours compact development within urban areas and provides that where the expansion of settlements takes place it should be delivered in a sustainable, compact manner. The proposed development constitutes an efficient use of lands which are zoned for residential development at Drogheda, town which accommodates strong physical and social infrastructure to support growth and is designated a regional growth centre.

#### **Implementation Roadmap for the NPF**

- 6.16 The Implementation Roadmap for the NPF sets out in detail the transitional arrangements for the implementation of the NPF at regional and local level. The Roadmap document sets out 'Transitional Population Projections', and notes that City and County Development Plans will undergo a process of review of review and updating by 2020 / 2021.
- 6.17 The transitional population projections plot a growth trajectory set approximately mid-way between what is currently being planned for in statutory Development Plans if projected forward to 2031, and the more likely evidence based and nationally coherent projected scenario to 2031 and 2040. These 'adjusted' transitional figures will apply to 2026 and will also inform the period to 2031.
- 6.18 The Roadmap document states that in all individual counties where population growth is projected to be at or above the NPF/ NDP national average baseline, provision shall be made to enable planning for aggregate growth within that county up to that figure for each Census year and related intercensal period i.e. to 2026 and, subject to review, 2031.
- 6.19 The Roadmap further notes that the published NPF population projections account for a 25% 'headroom' allowance for additional population growth in every County pro-rata, for each Census year and related intercensal period. For the purposes of the transitional population projections for the roadmap, a further 25%, over and above the population projected to 2026 in the NPF has been added.
- 6.20 Cumulatively, this means provision for 50% more growth than is required to 2026 has effectively been accounted for at a national level. It also means that there is limited further requirement for 'headroom' for population growth to be incorporated into

statutory Development Plans in most cases. However, the roadmap acknowledges that provision for headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline (i.e. Cork (City and County), Dublin (all four local authorities), Galway (City and County), Kildare, Limerick, Louth, Meath, Sligo, Waterford, Westmeath, and Wicklow.

- 6.21 The transitional population projections for Co. Meath set out within the Roadmap document are as follows:
- 2016 (census population figure) – 195,000
  - 2026 – 216,000 – 221,000
  - 2031 – 225,000 – 231,000
- 6.22 The Implementation Roadmap thereby acknowledges the need for a transitional period to implement the objectives of the National Planning Framework.

### **National Development Plan 2018 – 2027**

- 6.23 The National Development Plan 2018 – 2027 sets out the main investment projects, programmes and priorities envisaged over the next decade in order to drive the implementation of the NPF. The NPF states that the Dart Expansion Programme will see Drogheda serviced by DART by 2027, which will provide fast, high-frequency electrified services to Drogheda.

### **Eastern and Midlands Regional Assembly - Regional Spatial and Economic Strategy**

- 6.24 The Regional Spatial and Economic Strategy is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond. The Eastern and Midland Regional assembly (EMRA) was established in 2015 as part of the regional tier of governance in Ireland. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin. The principle function of the assembly is the delivery of a Regional Spatial and Economic Strategy (RSES), a new concept in Irish planning where not only the spatial but also the economic factors that go into the future of the region are brought together into one all-encompassing strategy.
- 6.25 There is at present a draft Ministerial Direction pending in relation to the adopted RSES. Those parts of the RSES which are the subject of the draft Direction are taken not to have come into effect until the section 31A procedure has been completed. All other aspects of the RSES are considered to have been made / adopted as of 28th June 2019. The elements of the RSES to which the draft Direction relate are not of any particular relevance to the current Strategic Housing Development proposal.
- 6.26 The overarching vision statement of the RSES is *‘to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all’*.
- 6.27 The RSES supports the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP) and the economic policies and objectives of the Government by providing a long term strategic planning and economic framework for the development of the region.



- 6.28 Drogheda is strategically located on the Dublin-Belfast economic corridor and the cross border network of Drogheda-Dundalk-Newry. It is defined as a regional growth centre within the Regional Spatial & Economic Strategy and constitutes the only regional growth centre within the hinterland area of the GDA as defined in the RSES.
- 6.29 The RSES notes the importance of the Dublin to Belfast Corridor and states:
- “ The Dublin – Belfast Economic Corridor comprises an internationally important spine connecting the two largest settlements on the island of Ireland via the regional growth centres of Drogheda, Dundalk and Newry.”*
- 6.30 The RSES notes as a growth enabler for the Dublin to Belfast Corridor the ‘compact and focused growth in the Regional Growth Centres of Drogheda and Dundalk to grow to city scale’.
- 6.31 At Page 61, the RSES document states:
- “Key priorities are to promote the continued sustainable and compact growth of Drogheda as a regional driver of city scale with a target population of 50,000 by 2031. The objective is to provide for the regeneration of the town centre, the compact planned and co-ordinated growth of the town’s hinterland along with enhancing Drogheda’s role as a self-sustaining strategic employment centre on the Dublin-Belfast Economic Corridor.”*
- 6.32 It is respectfully submitted that the proposed development represents an important step in the compact, planned growth of the hinterland of Drogheda, on a site which is contiguous with the built up area, and which will act as an important catalyst for further development in a planned, sustainable manner.
- 6.33 The RSES states ‘regional growth centres are large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area’.
- 6.34 The RSES supports ‘the direction of significant population and economic growth towards the key Regional Growth Centres of Athlone, Drogheda and Dundalk. These towns located outside the Dublin Metropolitan Area are, in addition to Dublin, critical to the implementation of effective regional development as set out in the NPF. They will accommodate significant new investment in housing, transport and employment generating activity. They are important self-sustaining centres that act as economic drivers for the Region, capitalising on their strategic location and high-quality connections to Dublin’.
- 6.35 RPO 4.11 “A cross boundary statutory Joint Urban Area Plan (UAP) for the Regional Growth Centre of Drogheda shall be jointly prepared by Louth and Meath County Councils in collaboration with EMRA. The UAP will support, the development of Drogheda as an attractive, vibrant and highly accessible Regional Centre and economic driver. The Joint UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.”
- 6.36 Future development required to achieve the growth vision for Drogheda included in the Joint UAP shall:
- *“Provide for the sustainable, compact, sequential growth and urban regeneration in the town core by promoting the regeneration of underused,*

*vacant or derelict town centre lands for residential development to facilitate population growth.*

- *Support the regeneration of the Westgate area of Drogheda's historic town centre to address vacancy and dereliction in the town core and as an alternative option to new development on greenfield sites.*
- *Facilitate the regeneration of lands at McBride Station to capitalise on existing and planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.*
- *Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.*
- *Support the sustainable development of existing zoned lands in the northern and southern environs of the town with a particular emphasis on the promotion of the IDA Business Park as a location for economic investment and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs.*
- *Support the implementation of the Urban Design Framework Plan for the Heritage Quarter."*

6.37 The subject development seeks to provide for medium-high density residential development on zoned lands within the designated regional growth centre of Drogheda. The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.

6.38 The proposed development will further the aims and objectives set out for the Drogheda UAP by providing for sustainable, compact development on existing zoned lands in the southern environs of the town, while helping to sustain the critical mass necessary to support the other goals for the future UAP.

#### **Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)**

6.39 These Guidelines support a plan-led approach to development as provided for in the Planning and Development Act 2000, as amended. Section 2.1 of the Guidelines note that *'the scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy'*.

6.40 The subject site is located in a Large Growth Town and can be considered as an outer suburban, greenfield site in respect to the guidance set out within the Guidelines for Sustainable Residential Development in Urban Areas, where densities of 35 to 50 units per hectare net are recommended, and no less than 30 units per hectare net. The proposed development will achieve a net residential density of 42units per hectare, which is considered to be an appropriate level of density given the location and nature of the subject site.

6.41 The application site is zoned for residential use in the current County Development Plan and is located within the settlement boundary of Drogheda and provides a suitable location for the sustainable expansion of the town over the coming years.

6.42 The Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines are accompanied by a Design Manual which demonstrates how design principles can be applied in the

design and layout of new residential developments, at a variety of scales of development and in various settings. The proposed development demonstrates a high standard of urban design, which will create a sense of place and distinct identity for the development.

- 6.43 This planning application is accompanied by a Masterplan which demonstrates how the proposed development will integrate into the existing urban context and will deliver the first phase in the development of the overall masterplan area.
- 6.44 The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:
- prioritise walking, cycling and public transport, and minimise car use;
  - are easy to access for all users and to find one's way around;
  - promote the efficient use of land and of energy, and minimise greenhouse gas emissions; and
  - provide a mix of land uses to minimise transport demand and reduce traffic speeds in housing developments
- 6.45 The proposed development incorporates design principles such as shared surfaces and raised table junctions to reduce traffic speeds on streets with housing and to prioritise walking and cycling.
- 6.46 The layout is highly accessible for all users, with a permeable layout both internally and externally as new linkages are provided to surrounding land uses. The layout is considered to be legible, with a clear distinction in design, character and treatment between distributor and local streets.

#### **Urban Design Manual – A Best Practice Guide (2009)**

- 6.47 The Urban Design Manual is based around 12 criteria that have been drawn up to encapsulate the range of design considerations for residential development based on *"a distillation of current policy and guidance and tried and tested principles of good urban design."*
- 6.48 The 12 no. criteria are discussed in detail in the accompanying Architectural Design Statement prepared by DDA in the context of the proposed development.

#### **Design Standards for New Apartments (2018)**

The Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018. The guidelines update previous guidance from 2015 in the *'context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines'*.

- 6.49 Sustainable Urban Housing: Design Standards for New Apartments 2018 amends aspects of the previous apartment guidance with the aim to:
- *'Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*

- *Make better provision for building refurbishment and small-scale urban infill schemes;*
- *Address the emerging 'build to rent' and 'shared accommodation' sectors; and*
- *Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs'.*

6.50 This SHD application is accompanied by a schedules document prepared by DDA Architects which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the 2018 Apartment Guidelines.

6.51 The apartment guidelines provide the following updated minimum floor areas and standards:

<b>Minimum overall apartment floor areas</b>	
Studio	37 sq m (n/a)*
One bedroom	45 sq m (38 sq m)*
Two bedrooms (3 person)**	63 sq m (n/a)*
Two bedrooms (4 person)	73 sq m (55 sq m)*
Three bedrooms	90 sq m (70 sq m)*

\* Figures in brackets refer to 1995 guidelines  
 \*\* Permissible in limited circumstances

6.52 The schedules document illustrates how each apartment meets or exceed the relevant standards for example in respect to apartment size, internal areas, dimensions and private open space. The one bedroom apartments provided have a minimum GFA of 47.4 sq.m in excess of the apartment guidelines requirement of 45 sq.m. The two bedroom apartments have a minimum GFA of 80.7 sq.m, which exceeds the minimum 73 sq.m required for two bedroom, four person units.

6.53 The three bedroom duplex units provided have a minimum GFA of 108.5 sq.m in excess of the apartment guidelines requirement of 90 sq.m.

6.54 The apartment guidelines provide the following in relation to private amenity space:

<b>Minimum floor areas for private amenity space</b>	
Studio	4 sq m
One bedroom	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

6.55 The one bedroom apartments provide private a minimum private amenity space of 5.3 sq.m in excess of the apartment guidelines requirement of 5 sq.m. The two and three bedroom duplexes/apartments provide private a minimum amenity space of 7.8 sq.m and 11.6 sq.m respectively in excess of the apartment guidelines requirement of 7 sq.m and 9 sq.m.

6.56 The proposed duplexes/apartments are considered to be suitability located on the subject site, located centrally within the site in close proximity to the proposed childcare and public open space, and will provide high quality residential development on the subject site.

6.57 The provision of parking spaces for the residential development is 592 no. spaces.

6.58 166 no. spaces are provided for the 166 no. apartments and duplex units with 52 no. visitor spaces in the scheme. The 2018 Apartment Guidelines note that ***'quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria'*** (Emphasis Added).

6.59 The Guidelines provide further guidance on locations which may be suitable for reduced car parking provision stating:

***'In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard'*** (Emphasis Added).

And;

***'As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required'*** (Emphasis Added).

6.60 The parking provision complies with the requirements for one car parking space per unit with a slight undersupply in the number of visitor car parking spaces. This is considered appropriate given the location of the subject site contiguous to the built up area of the town, and having regard to the high standard of pedestrian and cycle linkages to be provided, including the new bridge over the adjacent rail line.

6.61 The proposed apartments will accord with the requirement in the Guidelines for more than 50% of the units to be dual aspect units. The proposed apartments will also be designed to accord with the Guidelines in terms of units per stair core, storage areas and private amenity spaces.

### **Urban Development and Building Heights Guidelines (2018)**

6.62 The Urban Development and Building Heights Guidelines for Planning Authorities were published in their final form in December 2018 under section 28 of the Planning and Development Act 2000, as amended. Under Section 3 of the Guidelines (Development Management Principles), it is stated:

***"In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility."***

6.63 Paragraph 3.4 of the Guidelines (which relates to development on lands in suburban / edge locations) notes that housing developments outside city and town centres and inner suburbs, i.e. those which are located on the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards).

6.64 The Guidelines note that this pattern of development addresses ***"the need for more 1- and 2-bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more-bedroom homes across a variety of building typology and tenure options, enabling households to meet changing***

*accommodation requirements over longer periods of time without necessitating relocation”.*

- 6.65 The guidelines go on to note that this pattern of development can also provide for the development of an attractive “*street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood, passive surveillance and community...*”.
- 6.66 On that basis, the Guidelines state that development outside city centres and suburbs (i.e. suburban edges of towns and cities) should include “*an effective mix of 2, 3 and 4-storey development which integrates well into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets*”.
- 6.67 The proposed development provides for an effective mix of development heights, ranging from two and three storey houses, three storey duplex units, and four and five storey apartment buildings up to elements of six storey apartment development at key landmark locations on the main link street. The apartment and duplex buildings are focused on wider streets within the development and adjacent to areas open space, in order to provide for an appropriate sense of enclosure and passive surveillance.
- 6.68 In circumstances such as those set out above, in locations outside of town and city centres and in suburban locations, SPPR 4 of the Guidelines applies. SPPR 4 is as follows:

*“It is a specific planning policy requirement that in planning the future development 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 amending 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.”*

- 6.69 The proposed development accords with the guidance on density as set out within Sustainable Residential Development In Urban Areas (2007). The proposed development provides for a significant range of building heights and typologies in accordance with points 2 and 3 of the above SPPR. The scheme has been amended following consultation with the Board to provide for enhanced connectivity and improved design so as to knit the proposed development into the existing and future envisaged urban form of Drogheda, as a sustainable, compact new neighbourhood.

### **Design Manual for Urban Roads and Streets (2013)**

- 6.70 The Design Manual for Urban Roads and Streets (DMURS), 2013, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The issue of compliance with DMURS was a key theme during pre-application consultations with the Planning Authority and the Board and resulted in a number of alterations to the layout to the final proposals now submitted, including the incorporation of a revised layout for the link road as part of the final SHD application which will supersede the previously approved link road layout.

- 6.71 DMURS aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists, and public transport users. The Manual sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. Incorporating good planning and design practice and focus on the public realm, it also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The principle design guidance of DMURS has been considered in the design of this development. As demonstrated in the accompanying Masterplan and Design Statement and Traffic and Transport Assessment / Mobility Management Plan report accompanying this consultation request, the proposed development seeks to prioritise pedestrian and cyclists throughout and around the site in accordance with the policies set out in DMURS.
- 6.72 The street and building design of the proposed development has had regard to the recommendations of DMURS as it includes proposals for buildings fronting onto streets, raised surfaces at locations within the scheme and the creation of a pedestrian and cycle friendly urban environment. Raised table junctions are utilised throughout the scheme to calm traffic movements and ensure appropriate driving speeds.
- 6.73 DMURS features as set out in the DMURS Design Statement provided by DBFL include;
- A strong sense of street enclosure is achieved utilising the adopted building height to street width ratios internally; in parallel with the provision of street trees.
  - The potential dominance of on-street car parking for the apartment area is actively management through the provision of landscaped buffers, the provision of street trees and the provision of landscaped communal open space areas.
  - On-street activity is promoted internally along the residential streets through the adoption of 'own-door' dwellings and access to the apartments and duplex units from the proposed local streets and the approved link street,
  - The proposed design has sought to specify minimal signage and line markings along the internal local streets with such treatments used sensitively throughout.
  - Footpaths of generally 2.0m width are provided throughout the scheme and with connections / tie-in to existing external pedestrian networks.
- 6.74 The design of the proposed development takes account of the placemaking advice contained within DMURS, prioritising permeability and legibility. The scheme incorporates clearly defined character areas and landmark architectural elements to assist with wayfinding, drawing people towards focal points such as the gateway architectural elements on the link street, and the high-quality linear park within the scheme.
- 6.75 Cul de sacs are also minimised within the scheme, while junctions and turning radii are designed to prioritise the safety of vulnerable road users including pedestrians and cyclists.
- 6.76 Street trees are also utilised in accordance with Section 4.2.2. of DMURS, to act as a buffer on the link street, and to enhance the sense of enclosure and legibility throughout the scheme.

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**Transport Strategy for the Greater Dublin Area 2016 - 2035**

- 6.77 This strategy has been prepared by the National Transport Authority. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030.
- 6.78 The Strategy includes five overarching objectives to achieve the vision which are as follows:
- Build and strengthen communities
  - Improve economic competitiveness
  - Improve the built environment
  - Respect and sustain the natural environment
  - Reduce personal stress
- 6.79 The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.
- 6.80 The proposed residential development, which provides for a density of c 39 units per hectare, as a sustainable extension of the built up area of Drogheda adjacent to existing good quality public transport in the form of high frequency bus routes serving the town and rail transport, is considered to be consistent with the vision and objectives of the Transport Strategy for the GDA.

**Guidelines for Planning Authorities on Childcare Facilities (2001)**

- 6.81 Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.
- 6.82 As set out in the pre-application form and the accompanying planning report, the proposed scheme includes the provision of a childcare facility of 439 sq.m to be located within the development. The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to operator's particular requirements and will be dependent on what types of childcare facility are already available in the area. In this regard flexibility is required in respect to the future fit out and type of childcare facility proposed within the development.
- 6.83 Notwithstanding this, on the basis of a standard of 20 places for each 75 units (excluding one-bedroom units as provided for in the guidelines), c. 80 childcare spaces would be required. The proposed facility could likely provide c. 80 – 100 childcare spaces dependent on fitout and scheduling of care.
- 6.84 This level of childcare provision is considered to be appropriate given the scale of the proposed development.



**Guidelines for Planning Authorities on ‘The Planning System and Flood Risk Management (November 2009)’**

- 6.85 *The Planning System and Flood Risk Management* Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.
- 6.86 In order to comply with these Guidelines a Site-Specific Flood Risk Assessment has been prepared by DBFL to inform the Boards consideration of the current SHD application. The site is located within Flood Zone C and the proposed development is therefore appropriate.
- 6.87 The SSFRA was prepared to comply with current planning legislation, in particular the recommendations of “*The Planning System & Flood Risk Management - Guidelines for Planning Authorities*”.

**7.0 CONSISTENCY WITH LOCAL PLANNING POLICY**

- 7.1 This section of the planning report provides an account of the relevant local planning policy documents.

**Meath County Development Plan 2013-2019**

**Core Strategy and Settlement Hierarchy**

- 7.2 Drogheda Environs is identified as a Large Growth Town 1 within the Meath County Development Plan and sits alongside Navan at the top of Meath’s settlement hierarchy.
- 7.3 The County Development Plan states that ‘*Large Growth Towns are to accommodate significant new investment in transport, in economic and commercial activity and in housing. These towns will act as important self-sustaining regional economic drivers for the GDA, capitalising on their international connectivity and high quality connections to Dublin City, whilst also supporting and servicing a wider local economy. They are important centres for delivery of public services, with hospitals, Courts, Local Authority and Civil Service offices located within the towns; alongside IDA promoted companies, high order retail businesses, supported enterprise centres and active Chambers of Commerce providing a strong commercial hub within the town and environs*’.

Type of Settlement	Centres
Large Growth Town I	Navan, Drogheda Environs
Large Growth Town II	Dunboyne, Maynooth Environs
Moderate Sustainable Growth Towns	Ashbourne, Kells, Trim, Kilcock Environs, Dunshaughlin <sup>3</sup>
Small Towns	Athboy, Bettystown/Laytown/Mornington East, Duleek, Enfield <sup>4</sup> , Oldcastle, Ratoath, Stamullen <sup>5</sup>
Villages	Ballivor, Carlanstown, Carnaross, Clonard, Clonee, Crossakiel, Donore, Drumconrath, Gibbstown, Gormonston, Julianstown, Kentstown, Kilbride, Kildalkey, Kilmainhamwood, Kilmessan, Longwood, Mornington/Donacarney, Moynalty, Nobber, Rathcairn, Rathmolyon, Slane, Summerhill

**Table 2: Settlement Hierarchy for County Meath (Table 3.2)**

- 7.4 Chapter 3 of the Development Plan ‘Settlement Strategy and Housing’ supports population growth through infrastructure and housing provision as follows:

Objective SS OBJ 1 of the Settlement Strategy is ‘*To secure the sustainable development of County Meath in accordance with the settlement hierarchy set out in Table 3.2. In doing so, development will be primarily directed towards the identified Large Growth Towns. In towns and villages, development will facilitate in the first instance, the consolidation of settlements and the integration of land use and transport. The expansion of urban areas where it is necessary to facilitate growth as set out in the Development Plan shall promote mixed use development and be guided by the sequential approach in order to create a compact urban form and facilitate sustainable modes of transport.*

‘*SS OBJ 4 To focus development on the high quality integrated growth and consolidation of the identified Large Growth Towns enabling them to act as key employment and service centres in the county, to ensure that all other towns develop at a sustainable rate to facilitate self-sustaining expansion and to protect agricultural and amenity lands for their primary purpose.*

- 7.5 In relation to the two Large Growth Towns in Co Meath the CDP states under; ‘*It is an objective of Meath County Council to develop Navan and the Drogheda Environs as the primary development centres in Meath and to ensure that the settlements grow in a manner that is balanced, self-sufficient and supports a compact urban form and the integration of land use and transport*’ (Objective SS OBJ 8).

### **Zoning of the Subject Site, Phasing, and Site Specific Objectives**

#### Zoning

- 7.6 The large majority of the subject site is zoned A2 “New Residential” under the Meath County Development Plan 2013-2019. The Drogheda Southern Environs zoning map was incorporated as part of the 2013-2019 Development Plan pursuant to Variation No. 2 of the Development Plan, and can be found within the book of consolidated maps for the Development Plan.
- 7.7 The A2 zoning has a stated objective to ‘*provide for new residential communities with ancillary community facilities, neighbourhood facilities and employment uses as considered appropriate for the status of the centre in the Settlement Hierarchy*’. The proposed development accords with this zoning objective, as both residential and childcare facility uses are permitted in principles under this zoning.

- 7.8 The portion of the subject site which is traversed by the new bridge and pedestrian route (on the western side of the rail line) is zoned F1, with a stated objective to “*provide for and improve open spaces for active and passive recreational amenities*”. The element of the development proposed on this zoning comprises a route / trail / pathway providing a linkage to enhance pedestrian permeability in the wider area, and linking an existing and proposed area of public open space / recreational space on both sides of the rail line. The F1 zoning objective provides for permitted uses including *inter alia* “*Cycleways / Greenways / Trail Development/... Public Services*”. While the overall development is a Strategic Housing Development, the element of the development on this F1 zoning is considered to serve a more general purpose (i.e. it is not just an ancillary part of a residential development), in that it is a cycleway / pathway that will provide for a new public facility promoting permeability for the wider area, and a linkage from the existing built up area to an existing school to the east of the subject site. Therefore, the proposed linkage on this F1 zoned area is considered to accord with the relevant zoning.
- 7.9 Other elements of the scheme, including part of the proposed link street, and the area to the east of the childcare facility are located on lands zoned WL (White Lands). There is no land use zoning matrix for White Lands. Rather the zoning objective is more broadly stated. The objective is as follows: “*To protect strategic lands from inappropriate forms of development which would impede the orderly expansion of a strategic urban centre.*” The Development Plan further states that the aim of this zoning is “*to allow for a long term, integrated approach to the taken to the expansion of an urban area*”. It is respectfully submitted that the portion of the development on WL zoned lands is in accordance with this zoning objective as these elements do allow for an integrated approach to the long term expansion of Drogheda, and the inclusion of these lands is imperative to ensure an orderly expansion of the town.
- 7.10 The part of the site to the east of the childcare facility, which is subject to this zoning, will remain as open space / grassed area (this additional open space area is not relied upon to form part of the open space requirement for the proposed development). The roadway proposed through this element of WL zoned land is necessary to provide a link with the permitted access which forms part of the permission for the adjoining school (which is currently only accessible from Mill Road). A pumping station is also proposed on this part of the site (occupying a small area at the northern side of this area), it is envisaged that this feature will be decommissioned and removed in due course following the future development of other lands to the north, subject to a separate future planning application by others.
- 7.11 This element of WL zoned lands to the east of the childcare facility has been included in the current application for completeness, to provide for a link with the existing school, and to avoid the pocket of WL zoned space at this location remaining as an undeveloped barrier between the school and adjoining residential development. However, if the Board consider that the development on this area of WL zoned land is inappropriate, it is considered that it could be omitted or amended by way of condition. It is noted that an attenuation feature, as included on the WL zoned area has already been permitted under Reg. Ref. LB 180620. These elements of the scheme are required to facilitate the orderly expansion of the built up area, and to avoid a disorderly form of development which would cut off the adjoining school (which provides for a future link in its planning permission) from the subject site. The proposals for these WL zoned lands are considered to accord with the zoning objective for the lands, which is broadly stated as set out above.
- 7.12 The part of the site subject to this WL zoning which will accommodate the link street is subject to a specific objective (indicated on the zoning map) to provide a major distributor road. Road infrastructure comprising a link street (the layout for which the SHD link street layout will supersede) was previously permitted across these WL zoned

lands under Reg. Ref.: LB 180620. The proposed link road will serve a broad range of uses, including major employment uses such as that permitted under Reg. Ref.: LB 180620, and will thereby not constitute a solely 'residential' road, but rather one which is necessary to realise significant economic, employment and residential development at this location.

- 7.13 On this basis, the elements of the development proposed on White Lands are considered to be consistent with the zoning objective.

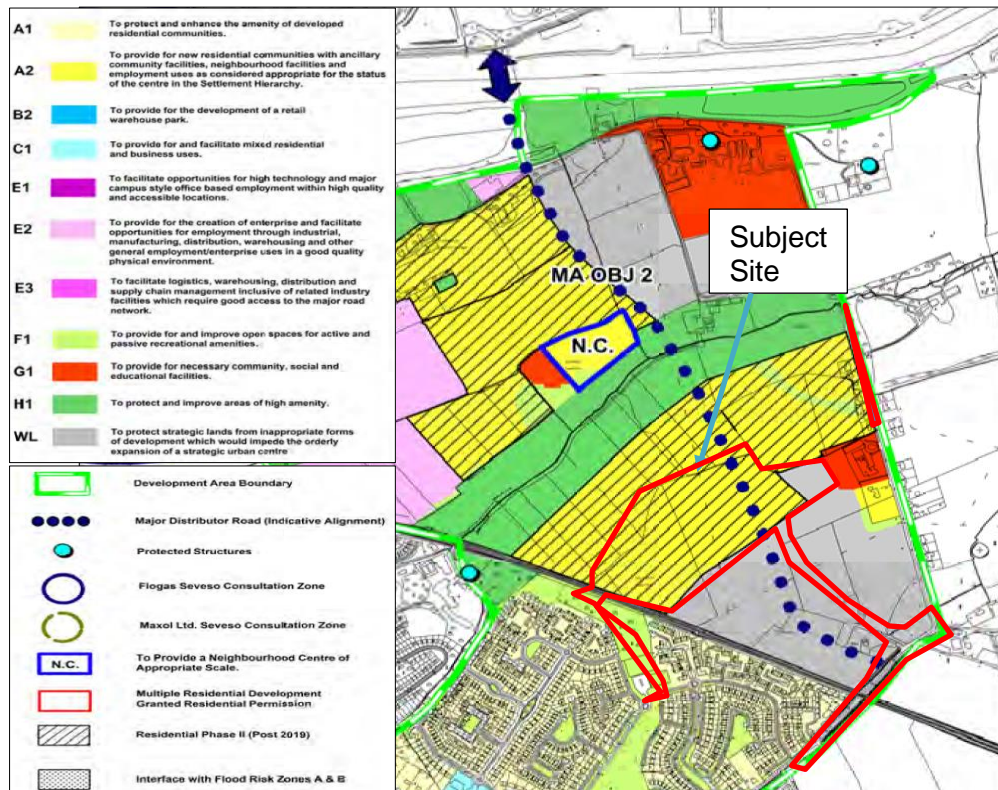
Phasing Objective

- 7.14 The area of the subject site which is subject to the A2 zoning objective is also subject to a separate phasing objective as set out within the relevant Zoning map, which shows both the land use zoning and specific objectives, designating the subject site '*Residential Phase II Post 2019*'. The phasing objective is a 'specific objective', and is distinct from and does not form part of the zoning objective, which is A2, to provide for new residential communities.

- 7.15 On foot of the Board's Opinion, which recommended further consideration of matters associated with the phasing of development, the current application is accompanied by a Material Contravention Statement, which provides a concise justification for the granting of permission for the proposed development, even if the scheme is considered to materially contravene the specific objective on phasing applied to the A2 zoned lands within the subject site.

Site Specific Objectives

- 7.16 The proposed site is located within the Mill Road/Marsh Road area. Policy Objective MMA1 of the Local Area Plan for the Southern Environs of Drogheda 2009-2015 states that the Mill Road/ Marsh Rd Area '*shall be developed in accordance with an approved Urban Design Framework Plan to safeguard the proper and sustainable development of the area*'.



**Figure 7.1: Meath County Development Plan 2013-2019, Drogheda Southern Environs - Land Use Zoning Map and objectives**

- 7.17 An Urban Design Framework Plan (UDFP) has been prepared for the Mill Road/Marsh Road area encompassing the subject site, in order to fulfil the requirements of the Local Area Plan (Policy Objective MMA1) and to ensure the proper planning and sustainable development of the area. The UDFP was submitted to Meath County Council for approval on the 8th of December 2017 accompanied by a Transportation Study and Economic Impact Study. The UDFP for the Mill Road/Marsh Road area was approved by Meath County Council on the 22nd of January 2018. The approved UDFP is submitted herewith as part of the current SHD application.
- 7.18 Major Objective - MA OBJ 2 states: *'To provide for a link road through the Mill Road/ Marsh Road District providing access to the lands and functioning as a local distributor road'*.
- 7.19 It is noted that a significant proportion of the link road through the Mill Road/ Marsh Road District has been previously permitted as part of Reg Ref: LB/180620 approved on the 31/07/2018. Notwithstanding this, in response to the Board's opinion on the pre-application submission, the current SHD application includes this piece of road infrastructure, and proposed changes to the road layout *vis a vis* that which was previously permitted, including the omission of a roundabout on the link road.

### Order of Priority

- 7.20 Strategic Policy 1 for Drogheda Southern Environs contained in Volume 5 of the County Development Plan refers to the order of priority and states;

*'To operate an Order of Priority for the release of residential lands in compliance with the requirements of CS OBJ 6 of the County Development Plan as follows:*

- i) The lands identified with an A2 'New Residential' land use zoning objective corresponds with the requirements of Table 2.4 Housing Allocation & Zoned Land*

*Requirements in Volume I of this County Development Plan and are available for residential development within the life of this Development Plan.*

*ii) The lands identified with an A2 'New Residential' land use zoning objective but qualified as 'Residential Phase II (Post 2019)' are not available for residential development within the life of this Development Plan'.*

### **Housing Allocation**

- 7.21 The Meath County Development Plan Core Strategy sets out a total housing allocation of 23,940 units in the county during the Plan period including 50% headroom. The total number of committed units estimated in the county at the time was 10,998. Therefore, an additional 12,942 units remained to be allocated.
- 7.22 A housing allocation of 857 units was provided for Drogheda Environs in the County Development Plan 2013-2019, in addition to 1,174 no. committed units with planning permission in December 2014. This equated to a total allocation of 2,031 residential units over the plan period, including headroom

### **Drogheda Southern Environs - Residential Land Evaluation**

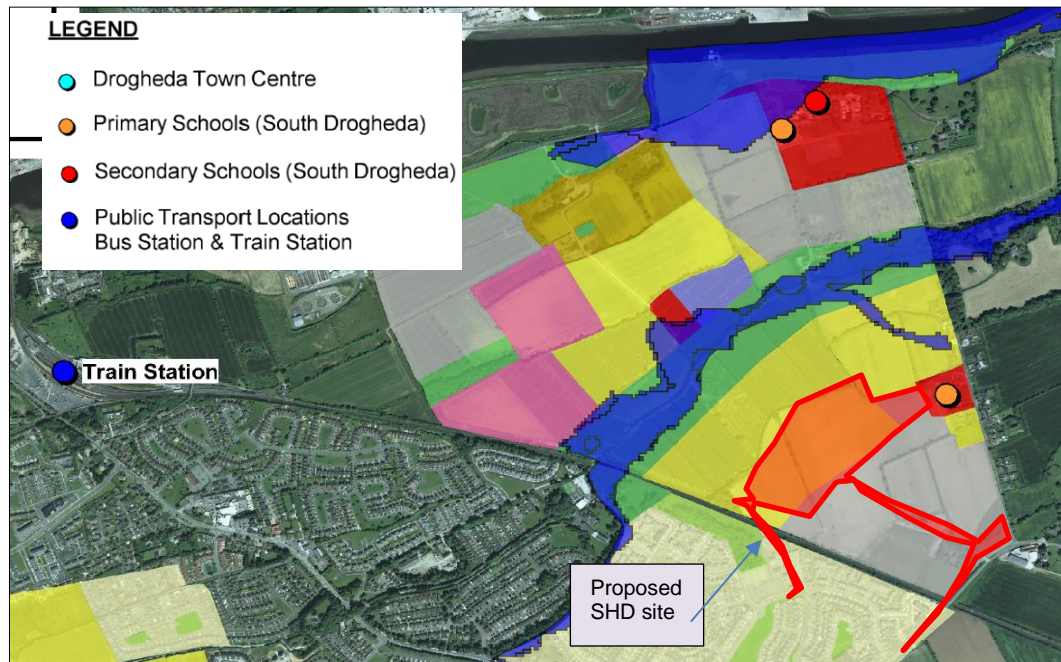
- 7.23 Volume 5 of the County Development Plan includes Additional Policies & Residential Zoned Land Evaluations for Local Area Plans including for Drogheda Southern Environs. The Drogheda Southern Environs LAP Residential Land Evaluation notes that lands have been identified on the land use zoning objectives map to accommodate the allocation of 857 no. units provided for under the Core Strategy.
- 7.24 The sites were identified through a residential land evaluation detailed in Table 6 of Volume 5 of the CDP. The proposed site is located within Site 7 in the evaluation and constitutes the southern section of Site 7.
- 7.25 The CDP notes that the residential land evaluation placed a strong emphasis on the sequential approach to development, and that the evaluation excluded those areas within the identified flood risk mapping and those sites with the benefit of an extant permission.
- 7.26 Tables 7 and 8 detail the outcome of the residential land evaluation as contained within the CDP. Table 8 shows that Sites 5 (south of the Bryanstown Cross Route), Site 1 (Rathmullan Road), Site 2 (Platin Road) and Site 9 (western end of Rathmullan Road) scored the highest. Sites 5 and part of sites 1, 2 and 9 were subsequently prioritised for release in Phase I, during the lifetime of the Meath County Development Plan 2013-2019. The phasing indicated in the land use zoning objectives map gives effect to this assessment. The total yield accruing from the sites in Phase I is 856 no. units and the total area of available land is 23.9 hectares.
- 7.27 Site 7 which includes the proposed SHD site was ranked joint 6<sup>th</sup> in the residential land evaluation and zoned phase II residential (post 2019).

### **Planning Rationale/ Justification for bringing forward the proposed Phase II Lands**

- 7.28 The Planning and Development (Amendment) Act 2018 has held back the Development Plan preparation and review process for Meath to tie in with the RSES adoption timescale. Having regard to the objectives of Rebuilding Ireland, the ongoing under supply of housing and rising housing need it is considered appropriate, in the interest of timely housing delivery, to bring forward a comprehensive, masterplan led, high quality residential development on these Phase II residential zoned lands.

7.29 The release of Phase II residential lands is considered justifiable in this instance given the following;

- Drogheda's status as referred to above in the NPF, the RSES and the County Development Plan,
- The lack of development of current Phase 1 zoned lands and significant shortfall in the delivery of housing compared to the targeted growth figures set out in the core strategy during the lifetime of the Meath County Development Plan 2013-2019,
- The site is in direct proximity to two schools (existing and permitted) and contributes infill residential development between the schools and the adjoining built up area to the west of the railway line, which the proposed development ties in with via the provision of a new bridge, providing for cycle and pedestrian linkages with the existing built up area of the town,
- The subject lands are zoned residential and are in the ownership of a housebuilding company with a proven track record of delivery both locally and nationally,
- The delay in the publishing of a new Development Plan arising from regulations linked to the timing of the RSES. The Development Plan is now out of date, while housing needs still must be met.
- The current housing shortage in which residential developments of scale can be considered to be of strategic and national importance,
- The permitted commercial/employment development (providing a total GFA of 11,205 sq.m.) and permitted road infrastructure serving the proposed site and recent permissions granted in the area,
- Local and national ABP precedents in relation to the approval of development on Phase II lands,
- The location and characteristics of the proposed site and its proximity to services as outlined in detail within this Planning Report and Statement of Consistency,
- The lands will be developed post-2019 in any event, given the timing of this application, and the Planning Authority have indicated their intention that the subject lands will be made available for short term housing delivery under the forthcoming new Development Plan,
- The Board is respectfully requested to consider the new draft Meath Development Plan, which is due to be published in late 2019, and the revised phasing proposals therein.



**Figure 7.2: Residential Land Evaluation Map (Points of Interest) – Drogheda Southern Environs**

- 7.30 Based on the reasons outlined above, and in the accompanying Material Contravention Statement and Statement of Response, it is considered reasonable to assume that the post-2019 residential zoned lands which are the subject of this proposed strategic housing development will be identified as A2 zoned lands in the new Development Plan. The intention to zone these lands for immediate delivery of residential development has been confirmed by the Planning Authority during the course of the pre-application process. We note also that any decision on the proposed strategic housing development will be made in 2019, with construction of the proposed development likely to take place from 2020 onwards on a phased basis.
- 7.31 For a more detailed justification for the proposed development in the context of the phasing of development land in Drogheda, please refer to the Statement of Response prepared by John Spain Associates which accompanies the application. A concise justification for contravening the Phase II objective pertaining to the subject site is also provided within the accompanying Material Contraventions Statement.

### Housing

- 7.32 The Meath County Development Plan states the following Core Principles in relation to Residential Development:

*“Core Principle 1- To develop Meath’s critical role in the Dublin and Mid East Region and its role as part of the Dublin City National Economic Gateway maximising on its proximity to Dublin Airport.*

*Core Principle 2 - To facilitate the development of sustainable and socially inclusive communities which generate pride, a sense of place, and a healthy lifestyle; are safe, well connected, well served, environmentally sensitive, thriving and well designed.*

*Core Principle 3 - To promote sustainable economic development to support the population of County Meath in accordance with the guidance and recommendations set out in the Economic Development Strategy for County Meath 2014-2022.*



*Core Principle 4 - To support the sustainable heritage of the County by safeguarding the cultural, natural and built heritage and natural resources, including biodiversity, of the County.*

*Core Principle 5 - To encourage mixed use settlement 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.*

*Core Principle 6 - To support the creation of a compact urban form in all settlements in Meath.*

*Core Principle 7 - To protect and support rural areas through careful management of physical and environmental resources and appropriate, sustainable development.*

*Core Principle 9 - To consolidate population growth and employment in areas best served by public transport and a range of transport modes.*

*Core Principle 10 - To promote and support the integration of land use and transport and a modal shift to greater use of sustainable modes of transport, including public transport, walking and cycling.*

*Core Principle 12- To ensure that future development patterns in Meath accord with the sustainable management of water resources.”*

7.33 It is considered that the proposed development is in accordance with the above-referenced Core Principles as follows:

- The proposed development will respond to demand and need for residential development within close proximity to Drogheda town centre, Drogheda Tran Station, and to existing residential areas.
- The proposed development will assist in meeting existing housing need and demand and the consolidation of population growth in Drogheda and in County Meath as a whole. As demonstrated above, the proposed development will benefit from proximate public transport facilities, and strong pedestrian and cycle linkages internally and externally to the Southgate Centre and Drogheda Town Centre, including an important new bridge linking the proposed development to areas on the opposite side of the adjoining rail line, and providing a strong linkage onward to the Southgate Centre.
- The proposal is for a residential development which exhibits a high standard of architectural and landscape design, and which will provide for a high-quality environment for future residents on a suitable site which is zoned for residential development.

7.34 Section 3.6.6 of County Development Plan relates to ‘Design of Residential Development’ and states, *inter alia*, that “*The primary aim of the Planning Authority in relation to residential development is to deliver high quality living environments to serve the needs of residents. Residential schemes should deliver a range of housing units which vary in size, type and tenure, within an overall scheme design, to accommodate a broad population profile including single person households, couples, and households with children, older people and people with a disability*”.

7.35 The proposed development has been designed to be fully in accordance with all of the relevant residential development criteria set out above in the national planning policy context, in particular the Design Manual for Urban Roads and Streets, as well as the

site development criteria set out in the County Development Plan. The proposed scheme will provide a mix of units across a range of house types, apartment types and duplexes. The scheme will therefore be suited to accommodate a broad population profile and provide for opportunities for future residents to upgrade or downsize within the proposed development over time as required.

- 7.36 The Development Plan, under Section 3.6, sets out the following policies which are considered to be of relevance to the current proposal:

*“HS POL 1 - To encourage and foster the creation of attractive mixed use sustainable communities which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities.*

*HS POL 2 - To require a high standard of design in all new residential schemes that are built in a style and scale that is appropriate to the landscape setting.*

*HS POL 3 - To integrate new housing into the existing social and urban fabric of the County’s settlements detailed in Table 3.2.*

*HS POL 4 - To promote energy efficiency both during the construction phase and during the lifetime of residential development by sensitive design and layout taking into account topography, orientation and surrounding features.*

*HS POL 6 - To support the concept of independent living for older people and people with disabilities and ensure where possible that housing for such groups is integrated with mainstream housing in their existing communities. Such housing shall generally be located close to existing or committed community and convenience retail facilities, where possible.*

*HS POL 9 - To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner, with regard to the Lifetime Homes guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’(2007).*

*HS POL 10 - To support a sequential approach to residential development in which the first choice location for new housing is within the built up area of towns and villages maximising under-utilised and brownfield lands within and adjoining town and village centres in the first instance and thereafter moving sequentially outwards.”*

- 7.37 The proposed development is fully in accordance with the above policies of the County Development Plan. The proposed development provides for a wide range of unit types and sizes, including a variety of houses, duplex units and apartments. The design of the proposed development is cognisant of the site characteristics and will provide the first phase in an overall masterplan for the area which will integrate into the surrounding area, the permitted commercial development to the south and the wider built footprint of Drogheda.

- 7.38 The subject site is sequentially suited to the provision of the proposed development, as the lands are contiguous to the existing built up area of the town, are in close proximity to the town centre and are in close proximity to existing and future employment uses.

### **Social Strategy / Community Infrastructure**

- 7.39 The following policies of the Development Plan in respect of community infrastructure and social infrastructure are noted and considered relevant to the current proposal:

*“SOC POL 1 To support the provision and distribution of a range of social infrastructure facilities in accordance with the Settlement and Core Strategies to meet the needs of the County’s population in liaison with other statutory, voluntary, private sector and community groups.*

*SOC POL 2 To ensure that, where practicable, community, recreational and open space facilities are clustered, with the community facilities being located in local centres or combined with school facilities as appropriate. Community facilities should be located close to or within walking distance of housing, accessible to all sectors of the community and facilitate multi-use functions through their design and layout.*

*SOC POL 5 To require as part of all new large residential and commercial developments, and in existing developments where appropriate, that provision is made for facilities including local/neighbourhood shops, childcare facilities, schools and recreational facilities, and to seek their provision concurrent with development.”*

- 7.40 In accordance with the above stated Development Plan policies, the proposed development includes the provision of a childcare facility and is located in close proximity to the future neighbourhood centre which is zoned in the LAP and illustrated in the accompanying masterplan. The subject site is also in close proximity to a number of schools (including two primary schools, an existing secondary school, and a permitted temporary secondary school which will be replaced by a permanent building in due course) and existing and future employment at the Southgate Centre and south of the subject site at Colpe Road.
- 7.41 The proposed childcare facility will be conveniently located within the proposed development and is proximate to the existing school on Mill Road, and will also be highly accessible for all future residents on foot or by bicycle.
- 7.42 In accordance with SOC POL 5, the development provides for an appropriately sized and located large childcare facility, outdoor recreational facilities and play areas. The capacity childcare

### **Transport**

- 7.43 Policy TRAN POL 16 of the Development Plan is *“To encourage, where appropriate, the incorporation of safe and efficient cycleways, accessible footpaths and pedestrian routes into the design schemes for town centres/neighbourhood centres, residential, educational, employment, recreational developments and other uses”*.
- 7.44 Policy TRAN POL 23 is *“To require planning applications for major developments to demonstrate proposals to address accessibility for pedestrians and cyclists.*
- 7.45 As set out above, the development provides for a high standard of pedestrian and cycle infrastructure. The quality of the pedestrian and cycle infrastructure proposals is demonstrated in the TTA report prepared by ILTP Consulting Engineers.

### **Waste Management**

- 7.46 WM POL 5 is *‘To require the provision of bring banks, bottle banks or other appropriate recycling facilities as part of the overall development in the case of new or extended shopping centre developments and commercial neighbourhood centres, educational, sports, recreational facilities and managed residential developments’*.
- 7.47 The proposed development includes provision of the following;

- All residential houses shall have sufficient space for the storage of a 3-bin waste system within the curtilage of the house either to the front or the rear.
- It is proposed that a green, clear and brown glass bottle and aluminium can recycling bins will be provided in each bin store as illustrated in Drawing Ref: 19-001-P-5.100.

### **Childcare Facilities**

- 7.48 Section 5.8 of the Development Plan sets out the policy of the Council in relation to childcare facilities. The Plan recognises that such facilities constitute key infrastructure required to enable increased participation in the workforce.
- 7.49 The childcare facility proposed herein is suitably located within the proposed development. The proposed location of the childcare facility will provide for ease of access from the wider development on foot or by bike, and significantly will thereby reduce the level of driving necessary to access childcare in the area.

### **Development Management Standards**

- 7.50 The County Development Plan standards for house sizes are as follows:
- One/two bedroom - 55 sq.m.
  - Three bedroom - 60 sq.m.
  - Four bedrooms or more - 75 sq.m.
- 7.51 The houses in the proposed development will exceed the above standards, many by a significant margin, as demonstrated in the accompanying schedules document.
- 7.52 In accordance with the Development Plan standards, a minimum separation distance of 22 metres will be observed between directly opposing windows.
- 7.53 Public open space, consisting of a linear park will be provided within the development at a rate which considerably exceeds the standard of 15% set out in the Development Plan. This level of provision is predicated on the need to provide for a good standards of open space provision interspersed with the residential streets.
- 7.54 The areas of private open space provided to the rear of the houses within the development will accord to the Development Plan standard of 55 sq.m for two-bedroom houses, 60 sq.m for three bedroom houses, and 75 sq.m for four bedroom houses. The areas of private open space for each individual unit are provided on the detailed site layout plans provided herewith.
- 7.55 As set out above, the apartments proposed within the development will accord with the 2015 Design Standards for New Apartments in their design, floor areas and layout. These guidelines, issued under Section 28 of the Planning and Development Act, superseded the standards set out within the County Development Plan for apartments.
- 7.56 The Development Plan, under Section 11.2.2.6, sets out requirements for boundaries and screen walls in new housing developments. As set out in the drawings and details prepared by Dermot Foley Landscape Architects, the rear garden boundaries of the proposed houses will be defined by 2-metre-high concrete post and concrete panel fencing. Please refer to Dermot Foley typical boundary treatment drawing for further details.
- 7.57 The Development Plan requires the preparation and submission of a detailed Transport and Traffic Assessment for residential developments in excess of 200

dwellings. Accordingly, a TTA Report, prepared by DBFL Consulting Engineers is submitted herewith.

### **Parking**

- 7.58 Table 11.9 of the Meath County Development Plan sets out car parking standards, while Section 11.9.2 of the Plan sets out the standards for car parking.
- 7.59 In accordance with the standard set out in the Meath County Development Plan 2013-2019, the proposal plans to provide for a total of 592 no. parking spaces. The DDA Architects documentation pack includes a schedule of car parking which sets out the compliance of the scheme with the relevant car parking standards within the Development Plan and the 2018 Apartment Guidelines.
- 7.60 It should be noted that the standard set out in the Development Plan for creche use is a maximum standard (1 per employee and 1 per 5 children). While the parking proposed for the childcare facility at 8 parking spaces, will not meet the above maximum standard, it is considered that the childcare facility is designed to serve the population of the proposed SHD development, greatly reducing the need for travel by car, and resulting in lesser demand for car parking. The facility will be highly accessible on foot and by bike from within the development due to the high-quality pedestrian and cycle infrastructure proposed. It is also considered that its location adjacent to the existing school will reduce trip generation due to the likelihood of linked trips.

### **Cycle Parking**

- 7.61 532 no. cycle parking spaces are being provided with this proposed development, which significantly exceeds the county development plan standards for cycle parking for this development while marginally lower than the Apartment Guidelines.
- 7.62 The DDA documentation pack includes a schedule of bicycle parking broking down to demonstrate an adequate level of provision for each apartment type within the scheme.

### **New Meath County Development Plan 2019-2025**

- 7.67 The new Meath County Development Plan 2019 to 2025 is currently being prepared by the Planning Authority.
- 7.63 It is considered, as set out herein, that there is a strong case to be made for bringing forward the subject lands in the new Development Plan, without any restriction in respect to phasing, having regard to Drogheda's status as a regional growth centre in the NPF and RSES and its status as a Large Growth Town in the CDP and the considerable infrastructure and services available in the town. The Planning Authority have confirmed during the course of the pre-application process that the subject lands are intended to be identified for short term residential development under the forthcoming new development plan.
- 7.64 We note under the Strategic Housing Legislation that An Bord Pleanála are provided with the opportunity to grant permission for much needed residential development on lands zoned for residential use, such as the subject lands zoned A2, notwithstanding other objectives / requirements of the Development Plan, for example the phasing of development. The long title of the Planning and Development (Housing) and Residential Tenancies Act (2016) states that the provisions therein (including Strategic Housing Development) were introduced *"to facilitate the implementation of the document entitled "Rebuilding Ireland - Action Plan for Housing and Homelessness" that was published by the Government on 19 July 2016"*.

- 7.65 The Rebuilding Ireland Action Plan seeks to provide for a step-change in the rate of housing delivery in the state following a prolonged period of inactivity in terms of housing development. It is considered that the proposed development will play a part in the provision of much needed housing supply in the context of a prolonged and ongoing shortage and increasing housing need. The proposed development will deliver compact, sustainable residential development which responds to this need and demand on appropriately zoned lands and in a manner which accords with national, regional and local planning policy.

### **Local Area Plan for the Southern Environs of Drogheda**

- 7.66 The LAP for the Southern Environs of Drogheda had an initial operational period from 2009-2015. Variation No. 2 of the County Development Plan incorporated development objectives (including in relation to order of priority as addressed above) into the County Development Plan pertaining to areas for which LAPs were to be retained, including Drogheda (Southern Environs). Following the adoption of Variation No. 2 of the County Development Plan, the LAP for the Southern Environs of Drogheda was also amended, to bring it into line with the County Development Plan (as varied).
- 7.67 Notwithstanding the fact that the operational period of the LAP, from 2009-2015 has now ended, it is considered appropriate to demonstrate the compliance of the proposed development with the provisions of the LAP.

### **Development Framework**

- 7.68 The LAP sets out a development framework for the development of the southern environs. The following key objectives are noted in particular:

*“DF1 All new development should be set in/ be mindful of the context of the existing built up area of Drogheda town and needs to demonstrate how it integrates with the town proper, both in terms of linkages and integration with the existing built form.*

*DF2 The sequential approach shall apply to all new residential development in that those areas closest to the existing built up area should be developed first.*

*DF3 All necessary physical infrastructure is required to be provided in line with all new development.”*

- 7.69 The proposed development is in accordance with the foregoing key principles. The development is mindful of, and contiguous with, the existing built up area of the town, and integrates effectively with new linkages to include a new link bridge across the adjacent railway line. As set out previously herein, the proposal is considered sequentially appropriate and provides for all necessary infrastructure to facilitate the new development, including the link street and new railway bridge.
- 7.70 Policies RDS1 and RDS2 set out requirements in relation to the size and standard for apartment development. It is noted that these policies are superseded by the 2018 Apartment Guidelines.
- 7.71 Policy RDS3 requires a good mix of residential unit types in all new developments. The proposed development provides for a wide range of unit types, layouts, and sized which will ensure an appropriate balance which is attractive for various tenure types and family sizes.
- 7.72 Section 5.5 of the LAP sets out policies in relation to public open space, including the following:

*“OS1 To require a landscape master plan for open space to be provided as part of housing developments. This should be drawn up by a qualified landscape architect. Planting shall be of species native to the area.*

*OS 2 To facilitate and encourage the development of children’s playgrounds in areas of public open space.*

*OS 3 High-quality landscaping in public and private developments, including the provision of mature trees, shall be an integral part of any application for residential development.*

*OS4 In large housing developments, it is an objective to encourage the inclusion of one central open space in the form of a fully landscaped park.*

*OS5 All planning applications shall be accompanied by a tree survey of all existing trees on the application site. The survey shall be prepared by a person competent in this field.”*

- 7.73 In relation to the foregoing objectives, it is noted that the current application is accompanied by a landscape masterplan and design statement prepared by DFLA. The development incorporates play areas, and the design and provision of high quality open space is integral to the design of the scheme. The scheme provides for a centrally located landscaped park. A tree survey is submitted herewith and trees and hedgerows are retained within the development where possible.
- 7.74 Section 5.7 of the LAP relates to neighbourhood and community facilities. Objective CF1 requires submission of a social infrastructure audit with larger planning applications that provide details of the available social infrastructure to support such schemes. Appendix 1 of this report sets out a concise audit of the available social infrastructure and school provision in the area. It is noted that the development is contiguous to the built up area of a major town which is designated for growth and which accommodates a very significant range of social infrastructure. In this regard it is respectfully submitted that there will be sufficient infrastructure (including schools adjacent to the site) to support the proposed development.
- 7.75 Section 5.10 of the LAP relates to heritage and landscape protection. In accordance with objective HL1, the scheme retains hedgerows and landscape features where possible. In accordance with objective HL3, removal of trees and hedgerows will not take place during nesting season.
- 7.76 In accordance with objective SWD3, the proposed development incorporates appropriate SUDs measures. In accordance with objective SWD7, the current application is accompanied by a full flood risk assessment prepared by DBFL Consulting Engineers.

#### **Specific Policies for Character Areas**

- 7.77 The subject site falls within the Mill Road / Marsh Road character area. This section of the LAP reiterates the requirements of Variation No. 2 of the CDP in relation to phasing of A2 zoned lands. This matter is addressed above, within the Statement of Response to the Opinion of An Bord Pleanála, and the Material Contravention Statement submitted herewith.
- 7.78 The relevant policy objectives set out in the LAP relating to this character area are as follows:

*“MMA1 The Mill Rd/ Marsh Rd Area shall be developed in accordance with an approved Urban Design Framework Plan to safeguard the proper and sustainable development of the area. The Plan needs to be developed in line with the requirements set out in Section 6.7 of the Local Area Plan, other relevant objectives contained in this LAP and cognisant of the Order of Priority for the release of residentially zoned lands as contained in the County Development Plan, 2013-2019, as varied.*

*MMA2 The delivery of adequate infrastructure services is a prerequisite to the development of the Mill Rd/ Marsh Rd Area. In all instances, priority will be afforded to the development of employment and community services.”*

- 7.79 In relation to objective MMA1, an Urban Design Framework Plan has been submitted to the Planning Authority and approved for this area. The UDFP is submitted herewith for reference. In relation to objective MMA2, the proposed development provides for all necessary infrastructure and services to allow for the delivery of the proposed development.

## **8.0 PART V**

- 8.1 The applicant has entered into discussions with the Housing Department of Meath County Council in respect to the Part V proposals for the subject site.
- 8.2 This planning application is accompanied by a Part V site layout plan illustrating the location of the Part V units (please refer to the DDA Design Statement and drawing pack for further details of each unit type), an estimate of costs and a cover letter in respect to the Part V proposals for the subject lands.
- 8.3 The Part V provision is proposed as part of the development is 36 no units with the breakdown shown below and is based on discussions with Meath County Council Housing Department.
- 6 no. 1 bedroom apartments,
  - 8 no. 2 bedroom apartments,
  - 5 no. 3 bedroom duplex units,
  - 10 no. 3 bedroom houses, and
  - 7 no. 4 bedroom houses.
- 8.4 The proposal includes a mix of unit sizes and types to cater for a variety of demand which the applicant understands reflects the current needs of the Council.
- 8.5 The applicant agrees to accept a condition on a grant of planning permission, if the Board is minded to approve the proposed development, which requires the applicant to enter into a Part V agreement with Meath County Council as per their requirements prior to the commencement of development.

## **9.0 CONCLUSION**

- 9.1 This report has been prepared by John Spain Associates to set out the planning and development context for the proposed strategic housing development, and all ancillary and associated development, and to demonstrate the consistency of the proposed development with the relevant national, regional and local planning policy context.
- 9.2 The report has also set out the site location and context, relevant planning history and a detailed description of the proposed development.
- 9.3 The statement set out herein also demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context. At



a national and regional level, this statement has demonstrated the consistency of the development with the following:

- National Planning Framework – Ireland 2040;
- The National Development Plan;
- Eastern and Midlands Regional Assembly Regional Spatial and Economic Strategy;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Design Standards for New Apartments (2018);
- Urban Development and Building Heights Guidelines (2018);
- Design Manual for Urban Roads and Streets (2013);
- Transport Strategy for the Greater Dublin Area;
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- The Planning System and Flood Risk Management (2009).

- 9.4 This report also demonstrates consistency with the Meath County Development Plan 2013-2019, and the LAP for the Southern Environs of Drogheda.
- 9.5 The proposed residential development is located within a defined regional centre, in close proximity to high quality employment development and public transport is considered to be consistent with the proper planning and sustainable development of the area.
- 9.6 It is considered that the proposed development is in accordance with the approved Urban Design Framework Plan for the area, will contribute to supporting compact growth and the consolidation of Drogheda's built form, and is of a scale that is sustainable and is suitably located within the town of Drogheda. The proposed development can be seen as a logical extension of the built-up area of Drogheda, on lands which benefit from permitted infrastructure including access, and are proximate to social and community infrastructure such as schools (Drogheda Grammar School, Le Cheile Educate Together National School, Gaelscoil an Bhradain Feasa), employment and retail (Southgate Centre).
- 9.7 In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and complies with all relevant national, regional and local planning policies and guidelines and that the proposal as presented fully addresses the points raised by the Board in their Opinion and during the course of pre-application consultation, and should therefore be subject to a grant of planning permission.

## **APPENDIX 1 – SOCIAL AND COMMUNITY INFRASTRUCTURE**

### **SOCIAL AND COMMUNITY INFRASTRUCTURE RELEVANT TO A PROPOSED SHD AT COLP WEST, DROGHEDA, CO. MEATH**

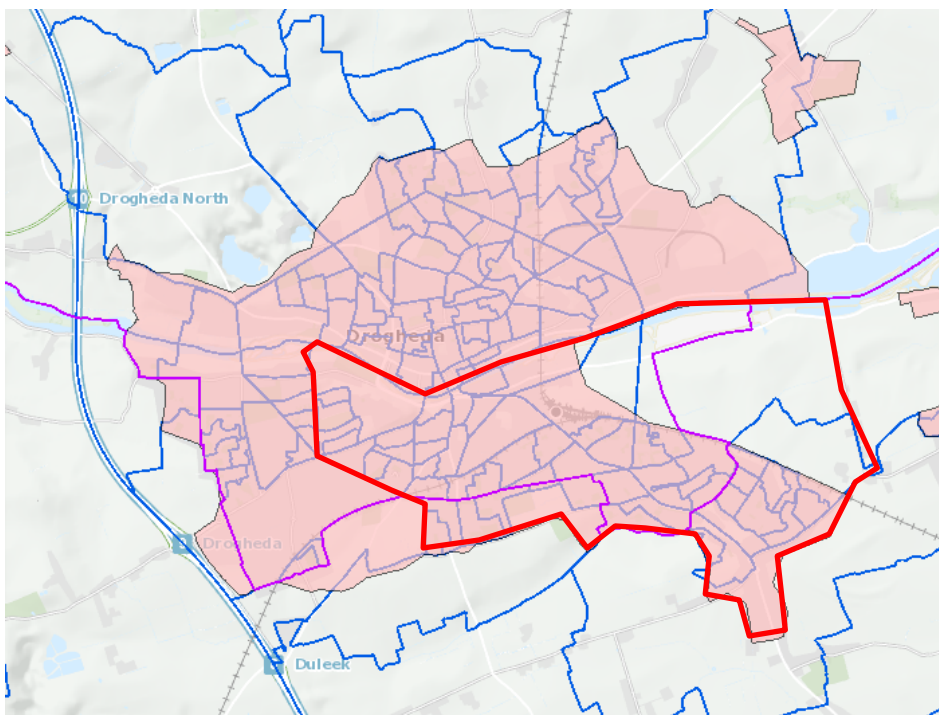
#### **Introduction**

The purpose of this statement is to provide a concise audit of the existing community facilities serving the area of the proposed development at Colp West. It provides information on the key population changes occurring in the catchment area and the potential demographic changes arising from the proposed SHD development. The report contains an audit of the existing and proposed social infrastructure in the area relating to:

- Education Facilities;
- Childcare;
- Sport and Recreation Facilities;
- Health Facilities and Social Services;
- Religious Facilities;
- Retail Facilities.

These facilities are assessed to support the proposed development of the subject site for residential use which also includes the provision of a childcare facility to serve the needs of the development. In particular this assessment will demonstrate that there is sufficient community provision within the area, therefore the development of the lands will not result in a negative impact on community related activities.

The study area for this audit primarily comprises the southern part of the settlement area of Drogheda, as defined in the 2016 Census of Population, and the small areas within which the subject site is situated.



**Figure A1: Relevant Area (Census 2016)**

## Education Facilities

There are several primary and secondary schools located within the relevant study area. These include the following:

- Marymount National School
- Saint Mary's National School
- St Mary's Diocesan School
- St Mary's Parish Primary School
- Sacred Heart Secondary School
- Drogheda Grammar School
- Le Cheile Educate Together School
- Gaelscoil an Bhradain Feasa

It is noted that Gaelscoil an Bhradain Feasa is located directly adjacent to the subject site, and the current application makes provision for a connection to this existing primary school. The existing primary school includes 16 classrooms, 4 resource rooms, 1 general purpose hall, 1 base classroom special needs unit and ancillary accommodation.

Furthermore, planning permission has recently been granted for a further temporary secondary school adjacent to the subject site, which the link street forming part of the current application will provide access to. This temporary school will thereafter be replaced by a permanent secondary school to serve the area on lands zoned for the provision of such facilities adjacent to the subject site.



**Figure A2: Location and Context of the Subject Site in the context of existing and permitted schools**

The proposed development would provide 357 no. units, for which a 10-year permission will be sought. This would lead to the delivery of units in phases from c. mid 2020 and would allow for the delivery of units over the subsequent two development plans following the current County Development Plan. It is envisaged that the proposed development would accommodate a population of c. 928 persons, based on an average household size of 2.6, which has regard to the continued reduction in average household size, with the most recent 2016 census of population noting an average household size of 2.75.

Based on an average primary school-going age cohort of 12% of the population (per the Department of Education methodology for calculating school demand), the additional primary school-going population which would be provided within this development would be c. 111 no children.

The number of secondary school-going residents within the proposed development is likely to be c. 79, based on a secondary school attendance rate of 8.5% of the population on average.

The population of Drogheda settlement, per the 2016 census was 40,956 (an increase of 2,378 over the 2011-2016 intercensal period) with a likely primary school-going age cohort of c. 4,915 no. children and a secondary school-going cohort of c. 3,481 no. children (based on the above referenced average percentages).

Based on the comparatively small overall difference in school-going numbers that will be precipitated by the proposal, it is considered reasonable to assume that the school-going population from the proposed development would be accommodated within the existing school infrastructure, and planned and permitted school infrastructure in the immediate vicinity, particularly as the lifecycle of adjacent more established residential areas in south Drogheda (such as Grange Rath) move beyond the school going age.

**Childcare**

The proposed development includes the provision of a large childcare facility with a GFA of 439 sq.m to be located within the development. The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to operator's particular requirements and will be dependent on what types of childcare facility are already available in the area. In this regard flexibility is required in respect to the future fit out and type of childcare facility proposed within the development.

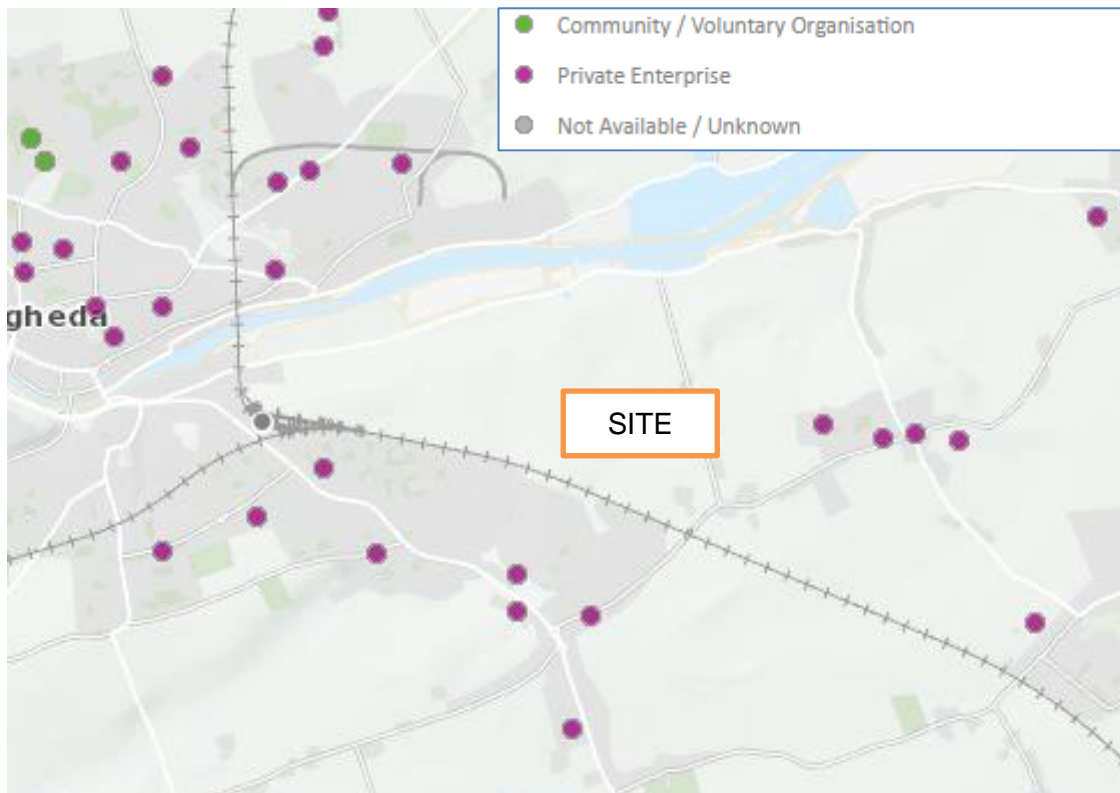
Notwithstanding this, on the basis of a standard of 20 places for each 75 units (excluding one-bedroom units as provided for in the guidelines), c. 80 childcare spaces would be required. The proposed facility could likely provide c. 80 – 100 childcare spaces dependent on fitout and scheduling of care.

This level of childcare provision is considered to be appropriate given the scale of the proposed development and will ensure that there is sufficient capacity to cater for the development proposal.

We have also identified the following current existing childcare facilities as being located within c. 2km of the subject site:

- Little Treasures Preschool
- Daisy Chain Montessori
- Peter Pan Creche
- Wheaton Hall Montessori Academy

- The Playhouse
- Jo Jingles
- The Grange Preschool and Early Years Centre
- Willows Creche
- The Beeches Montessori School
- Cute N Clever Kids



**Figure A3: Childcare facilities in the vicinity of the subject site (Pobal.ie)**

### **Sport and Recreational Infrastructure**

The area in the vicinity of the development, and Drogheda itself benefits from a wide range of sport and recreational infrastructure. The relevant area of the town is currently served by a range of facilities including the following:

- St Colmcilles GAA Club
- Inver Colpa Rowing Club
- Chord Celtic FC
- Boyne RFC
- Wolfe Tones GAA Club
- Drogheda Town FC
- Holy Family Boxing Club
- Funtasia Drogheda
- Drogheda Leisure Park
- Boyne Valley Country Club

There are also other sports clubs and recreational facilities of a smaller scale in the area, such as gym and fitness studios in the nearby Southgate Centre.

The wider town of Drogheda provides a significant range of sporting and recreational facilities. Some examples are provided below, as an exhaustive list is considered unnecessary:

- Boyne Rovers FC

- Lourdes Stadium Track and Sports Arena
- Labfitness Studios
- Integral Fitness and Leisure Centre Drogheda
- Moneymore Football Club
- Drogheda United FC
- O'Raghallaighs Gaelic Football Club
- Drogheda and District Athletic Club
- Experience Gymnastics

The proposed development will also provide areas of high amenity open space with play areas for children in addition to open space areas and a playground.

### **Health Facilities and Social Services**

Drogheda is well served by medical and healthcare facilities, including several within the vicinity of the proposed development. Those located in the vicinity of the subject site include the Ardryan Clinic on the R132, Southgate Dental Clinic within the Southgate Centre, Southside Medical on the R132, and several General Practitioners in the vicinity.

Drogheda itself accommodates a significant range of medical facilities, including *inter alia* Our Lady of Lourdes Hospital, Cottage Hospital, several primary care type facilities and clinics, a number of GP practices, dental practices and opticians.

It is considered that Drogheda, as a major urban area is well served by medical and healthcare uses to accommodate the proposed development.

### **Religious Facilities**

Drogheda Presbyterian Church is located in close proximity to the subject site. Other churches and places of worship in the wider vicinity include Star of the Sea Church, St Mary's Church, Gerrard's Church, and New Life Family Church. There is also a Mosque and Islamic Centre in Drogheda town

### **Retail Facilities**

The town is served by a wide range of shops, supermarkets, banks, post offices, restaurants, cafes, hotels, filling station, a pharmacy and public houses.

In the immediate vicinity of the subject site is the Southgate Centre. The proposed development includes provision of a new pedestrian and cycle link to this retail centre over the rail line adjoining the site.

The Southgate Centre accommodates a wide range of comparison and convenience retail and café / restaurant uses, including the following:

- A significant Dunnes Stores anchor store including comparison and convenience sections
- Zu Zu Cafe
- Relish Cafe Coffee Shop & Deli
- Southgate Pharmacy
- Southgate Barbers
- Conor's Butchers
- Southgate Florist
- Southgate Newsagent
- Renaissance Hair & Beauty

## **Conclusion**

This social and community audit has been prepared to assess the community facility provision in the area of the proposed development – focusing primarily on the immediate vicinity of the proposed development but also taking account of the facilities and infrastructure available in Drogheda town, which the proposed development constitutes a sustainable expansion of.

The audit indicates that the study area is well served by community facilities. As such it is submitted that the proposed residential and childcare facility can be accommodated by the existing community facilities in the area, particularly bearing in mind the facilities to be provided as part of the development, the linkages to be provided to ensure access to facilities at Southgate, and the existing and permitted schools directly adjacent to the subject site.