

**Statement of Response to ABP's Opinion
in relation to Reg. Ref.: ABP-303309-18**

In respect of

A Proposed Strategic Housing Development

at

Colp West, Drogheda, Co Meath

Prepared for

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1.0 INTRODUCTION

This Statement of Response report seeks to address the issues raised within the Opinion of An Bord Pleanála, issued following pre-application consultation in respect of the proposed development. The Opinion of the Board was issued on the 20th of February 2019.

This statement has regard to the points of discussion and issues raised during the course of the tripartite SHD pre-application meeting held at the offices of An Bord Pleanála on the 4th of February 2019 and the Section 247 meeting held with Meath County Council.

This Statement will refer to other documentation which forms part of the final planning application pack, where more detailed and specific responses are provided to the issues dealt within this Statement by the relevant experts / design team members and consultants.

This Statement seeks to direct the reader to the relevant information within the application documentation, which demonstrates that the issues raised during the course of pre-application consultation have been fully and satisfactorily dealt with prior to the submission of this final Strategic Housing Development Application.

2.0 RESPONSE TO AN BORD PLEANÁLA OPINION

The Opinion of An Bord Pleanála on the pre-application stage for the proposed development sets out five specific items requiring further consideration by the applicant and design team. The Board considered that these items needed to be addressed in the final documentation submitted to the Board in order to ensure that the proposed development and supporting documentation would constitute a reasonable basis for an application for strategic housing development.

Each of the five items raised within the Opinion are set out below, and a response is provided thereto, referring to other documentation or sections within documents which provide a more detailed or technical response where relevant.

The Board also set out 14 no. items of further specific information which were to be provided as part of the final planning application. Documentation has been prepared or updated in response to this request to ensure that the Board have all the information they require to come to a reasoned decision on the proposed development. A summary of the responses provided to each of these specific points is also set out within this section. The most significant of these is that an EIAR and NIS have been prepared and accompany the final planning application, given the alterations to the scheme from pre-application to final application stage, and in particular the increase in overall site area.

ITEM 1 – TIMING AND PHASING OF DEVELOPMENT

'Further consideration and/or justification of the documents as they relate to the development of Phase II residential lands as set out in the statutory county development plan and the possible prematurity of development at this location pending the completion of the review of both the Louth and Meath county development plan process and the more strategic planning policy context in particular the draft Regional Economic and Spatial Strategy which contains an objective RPO 4.8 relating to the preparation of a Joint Urban Plan for Drogheda.

An appropriate statement in relation to section 8(1)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended by Section 53 of the Act of 2018, that outlines consistency with the relevant development plan and that specifically addresses any matter that maybe considered to materially contravene the said plan should be provided. In this context reference should be made to the draft Regional Economic and

Spatial Strategy and the Joint Urban Plan which will replace existing statutory plans for the area.

Further consideration of these issues may require an amendment to the documents and/or design proposal submitted’.

Introduction

It is considered beneficial firstly to provide an introduction to the site context in this response document before progressing to the justification of the development of Phase II residential lands in this instance.

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 and social and community infrastructure (Southgate Centre, Drogheda Grammar School, Le Cheile Educate Together National School, Gaelscoil an Bhradain Feasa and a recently permitted temporary secondary school), it’s proximity to public transport including rail and private bus services, the site’s location contiguous to the existing built form of Drogheda and existing residential developments, the ongoing expansion and infill of Drogheda’s urban form which serves to further demonstrate the strategic location of the Mill Road/Marsh Road lands, the permitted road infrastructure serving the proposed site, and the potential of the proposed development as a key enabler to unlock the development potential of the Mill Road/Marsh Road lands to provide for the orderly and sustainable expansion of the town of Drogheda.

The proposal builds upon the permitted commercial development and road infrastructure approved by Meath County Council under Reg Ref.: LB 180620 and the recently permitted temporary school located in the southern portion of the framework plan area.

In relation to Issue No.1 – Timing and Phasing of Development, the section below sets out firstly to provide further justification of the proposed development of Phase II residential lands, and address the concern raised about possible prematurity of development at this location pending the review of the CDP and the preparation of a joint urban plan for Drogheda.

In relation to the second part of Item 1, a Statement of Consistency with Planning Policy accompanies this planning application which outlines consistency with the Meath County Development Plan, Section 28 guidelines and National and Regional Planning Guidelines including the adopted RSES for the EMRA. We also note the objective outlined in the RSES for a Joint Urban Plan for Drogheda and make reference to this forthcoming plan herein and in the accompanying Statement of Consistency.

In addition, a Statement of Material Contravention has been prepared which justifies the proposed development with regard to the criteria of section 37(2)(b) of the Planning and Development Act 2000 (as amended). The Material Contravention Statement, along with this Statement of Response to the pre-application Opinion and Statement of Consistency, puts forward a justification for the development of Phase II lands at this location.

In summary this response and the appendices of this report address the planning rationale and justification for bringing forward a strategic housing development on the subject site which is zoned A2, with a Phase II (post 2019) phasing in the Meath County Development Plan 2013-2019. Appendix 1 and 2 of this response document include 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 zoned lands have failed to deliver the targets set out in the core strategy. Please refer to Appendix 1 and 2 of this report

for a full detailed analysis of the delivery performance of Phase I zoned lands in Drogheda thus far.

In relation to the residential land evaluation, it is considered evident as outlined in Appendix 1, that in any updated residential land evaluation undertaken for the next County Development Plan that the subject site would score more favourably, due to the factors outlined in Appendix 1 such as the permitted road infrastructure, employment development and recently permitted school.

It is submitted, based on the analysis undertaken of the phase 1 zoned 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.

Recent ABP Precedents for development on Phase II Lands

A relevant precedent which is applicable to the current development proposal is the recently approved SHD development at Bryanstown, Drogheda, Co. Meath under Reg. Ref.: ABP-303799-19 (also located on Phase II lands).

We note the Board Inspector's Report, which addressed the issue of timing and phasing of development as follows:

'I am satisfied that the Board is not precluded from granting permission in this instance with regard to the provisions of section 37(2)(b), given that the development is of strategic importance due to the delivery of housing on zoned land in the context of the strategic role of Drogheda on the Dublin-Belfast corridor, as stated in the NPF and the ongoing demand for housing in Drogheda in the context of strong population and employment growth as identified in the RSES. I accept that the Phase I lands have not yet delivered the core strategy target no. of residential units for Drogheda Southern Environs'.

It is also noted that the report of Meath County Council on the application referred to above states that the Phase II lands are likely to be brought forward for development in the forthcoming new County Development Plan.

A further recent and relevant example of the Board granting permission for a Strategic Housing Development locate primarily on Phase II lands is that which was approved by the Board on the 23rd of April 2019 (under Reg. Ref.: ABP-303433-19) at Dunshaughlin East, Co. Meath.

The reasons and considerations provided by the Board within their Order to grant permission included *"the site's location on lands which allows for residential development and open space, and which represents a logical extension of the built up area of Dunshaughlin"*.

The Board Inspector's Report for Reg. Ref.: ABP-303433-19 stated the following in relation to the Phase II designation of the majority of that site:

"Taking a realistic approach based on the planning policy environment currently in place, I am of the view that development on Phase II lands could proceed post 2019. In support of this, all the information on file from both the applicant and the planning authority point to the suitability of bringing the entire site forward for development in a coordinated and phased manner. There is wastewater treatment capacity, impact on the road network appears acceptable and the provision of future educational and sporting facilities seem to be planned for. The underlying zoning is for residential purposes, with the proviso that a significant portion be held back until the end of this year, 2019. Given the scale of development

proposed, the coordinated and frontloaded approach to supporting infrastructure detailed in the phasing plan submitted by the applicant, I see no reason to restrict development until such time as a new plan is adopted. I am satisfied that the phasing plan devised by the applicant is reasonable and logical and would not conflict with the aims and objectives of the current plan and exploits available infrastructural capacities in the area.”

On the basis of the foregoing, it is respectfully submitted that there is ample precedent for the granting of permission for Strategic Housing Developments on Phase II lands in County Meath, where the granting of such permission is justified.

A2 Land Use Zoning

The majority of the application site is zoned as A2 “New Residential”, under which zoning residential development is permissible.

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’.

The A2 zoned lands within the subject site are also subject to a phasing objective ‘Residential Phase II Post 2019’ under the Meath County Development Plan 2013-2019.

The accompanying Material Contravention Statement prepared by John Spain Associates provides a concise rationale for the granting of permission notwithstanding the phasing objective applying to these A2 lands. However, it is noted that no issue arises in relation to section 9(6)(b) of the Planning and Development (Housing) and Residential Tenancies Act, as amended, as the proposed development accords with the A2 zoning objective under which residential development is permissible. The zoning of the subject site, and the compliance of the proposed development with the relevant zoning objectives, is addressed in detail within the accompanying statement of consistency and planning report prepared by John Spain Associates.

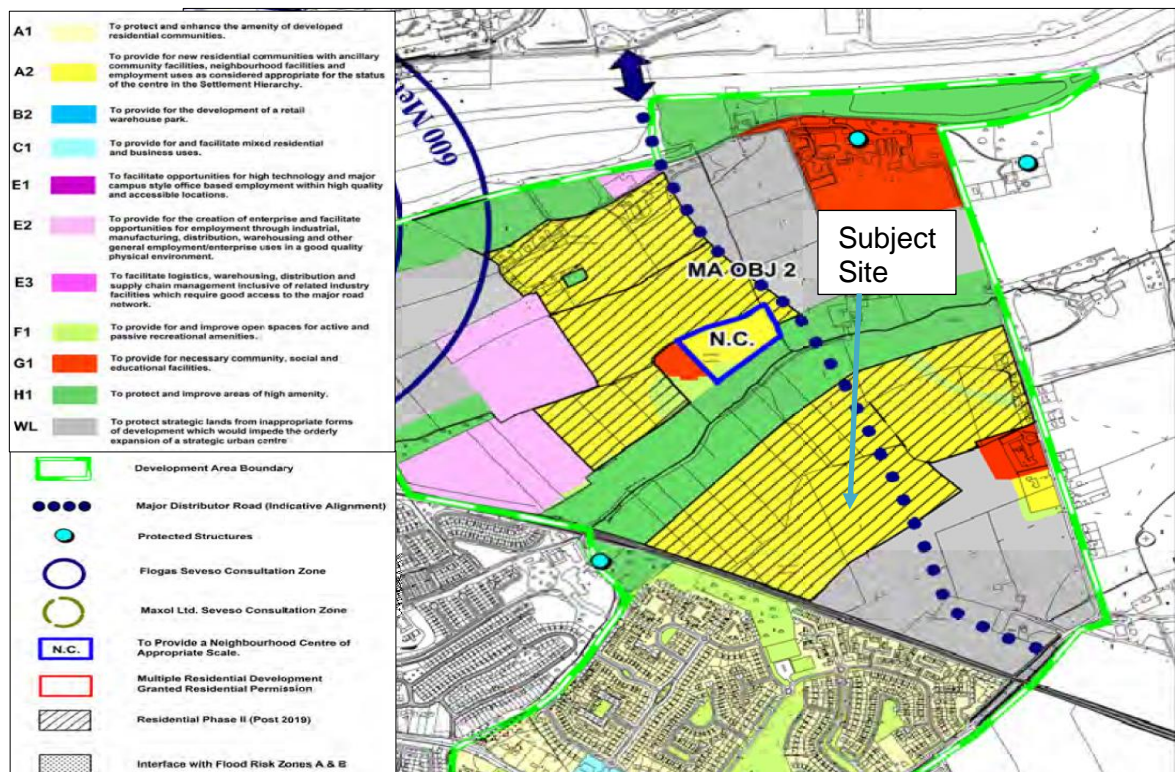


Figure 2.1: Meath County Development Plan 2013-2019, Drogheda Southern Environs - Land Use Zoning Map

Order of Priority

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 1 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

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.

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

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.

The sites were identified through a residential land evaluation detailed in Table 6 of Volume 5 of the CDP and included in Appendix 1 of this report. The location of these lands is illustrated on the maps in Appendix 2 to Volume 5 (Residential Land Evaluation Maps) and included in Appendix 1 of this report. The proposed site is located within Site 7 in the evaluation and constitutes the southern section of Site 7.

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.

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.

Site 7 which includes the proposed SHD site was ranked joint 6th in the residential land evaluation and is subject to a phase 2 phasing objective (post 2019).

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

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 lands.

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

- Lack of development of Phase 1 lands and lack of delivery of targeted growth figures during the lifetime of the current development plan, having regard to the fact that the core strategy of the Development Plan is out of date, and the subject site is intended to be zoned for immediate housing delivery under the forthcoming new Development Plan, as confirmed by MCC during the course of the pre-application process.
- National planning policy including Rebuilding Ireland - Action Plan for Housing and Homelessness, the National Planning Framework, and the Regional Spatial and Economic Strategy for the EMRA.
- The position of Drogheda in the Meath settlement hierarchy and its designation as a major growth centre under the RSES for the EMRA.
- The current housing shortage in which residential developments of scale can be considered to be of strategic and national importance.
- The permitted infrastructure serving the proposed site and recent permissions granted in the area, including the recently permitted residential development at Bryanstown (Reg. Ref.: ABP-303799-19) which is located on Phase II lands in Drogheda.
- The schools, employment and retail facilities serving the area including Southgate Centre, Drogheda Grammar School, Le Cheile Educate Together National School and Gaelscoil an Bhradain Feasa (noting the permitted temporary school which is to be provided adjacent to the site also).
- The location and characteristics of the proposed site.

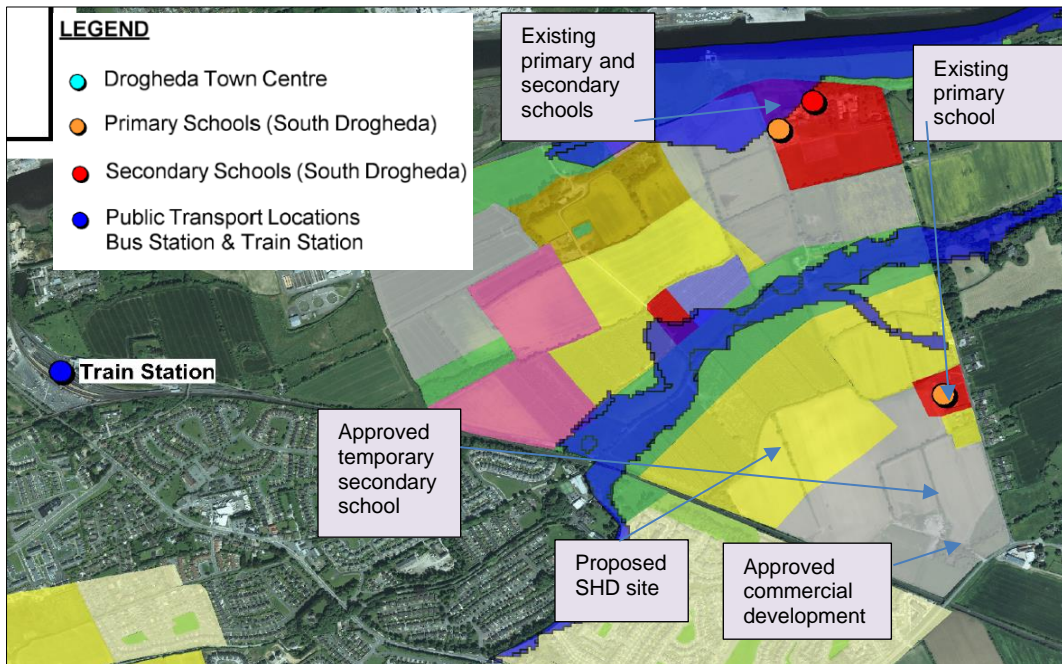


Figure 2.2: Residential Land Evaluation Map (Points of Interest) – Drogheda Southern Environs

Based on the reasons outlined above and herein it is considered reasonable to assume that the post-2019 phased, A2 zoned lands which are the subject of this proposed strategic housing development will be identified as A2 zoned lands in the new Development Plan. This assumption is supported by the Planning Authority, who have noted that it is intended to zone the lands for immediate residential development under the new County Development Plan. We note also that any decision on the future proposed strategic housing development will be made in 2019 onwards with implementation of the development likely to commence in Q2 2020.

The Planning Authority have confirmed during the course of the pre-application process that the subject site will be zoned for residential development under the forthcoming new development plan.

Phase I Land Evaluation

Appendix 1 of this statement of response provides a detailed analysis (summarised below) of the Phase 1 lands within the southern environs of Drogheda, which clearly reveals a shortfall in housing delivery over the Development Plan period to date on these lands *vis a vis* the housing allocation provided for under the Core Strategy.

The Core Strategy of the Meath County Development plan set out a target for delivery of 857 units, and then evaluated and designated the development sites where these would be delivered. The core strategy figures have not been realised on the identified Phase I zoned lands. A site survey and review of the planning history of the sites reveals that no units have been delivered, and there are not sufficient planning permissions in place for the delivery of these units. The following tables summarises this position.

TABLE 1: DELIVERY ON CORE STRATEGY ALLOCATION	Units
Housing Allocation as per Table 2.5 of the Development Plan	857
Delivered / Committed	
Site 5 - 0 built, 0 committed	0
Site 1 - 235 allocated, 0 built, planning permission in place for 156 (LB170675)	156
Site 2 - 235 allocated, planning permission for 98 (LB 180611) granted, construction started last week, with 0 built to date, creating a shortfall of 137 <i>vis a vis</i> the housing allocation.	98
Site 9 - 235 allocated, 0 built and 0 committed	0
Total committed	254
Shortfall from 857 allocation	603

As set out in Table 1 above, based on a review of units permitted, under construction and completed on lands included in the residential land evaluation (as set out above), the following figures have been compiled for Drogheda Southern Environs for the 2013-2019 Development Plan period (see Appendix 1 for marked up map):

- Units Completed /Commenced / Under Construction – c. 98
- Units Permitted (including units commenced / under construction)– c. 254

The total number of units completed, permitted and currently under construction is therefore 254 units.

Given the allocation of 857 units over the current Development Plan period (including headroom), this constitutes a current shortfall of c. 603 units.

TABLE 2: DELIVERY OF HOUSING CONSIDERED AS COMMITTED DEVELOPMENT IN THE CORES STRATEGY	Units
Extant Permissions / Committed Development as per Table 2.5 Core Strategy	1174
Committed Development Which Has Expired - creating headroom	
SA 60067 413 units permitted at Bryanstown - 0 built	413
SA 60309 - 575 units permitted, approx. 175 in total are now built or have permission in place for approximately 50 more (new permissions in 2018 (LB 180042) and 2019 (LB190071)). 575 committed - 225 (built and committed) creating a net shortfall of 350 units.	350
Shortfall from expired allocated units on 2 sites	763

As per Table 2 above, the County Development Plan core strategy allocation for Drogheda Environs (857 units) was in addition to 'committed development' in the area, which totalled 1,174 units. These committed developments were denoted within the Development Plan zoning maps using red lines around the boundaries of the relevant sites.

It should also be noted that some of the extant permissions (indicated on the Development Plan zoning map by a red outline of the relevant lands) included in the core strategy figures as ‘committed development’ have expired, including the following:

- Reg. Ref.: SA60309 – 575 residential units at Platin / Duleek Rd. Legavoreen, Drogheda. Approximately 175 of the permitted units in total are now built or have permission in place (new permissions in 2018 (LB 180042) and 2019 (LB190071)). On this basis, the 575 units considered as committed development, minus c. 225 units (built and committed at present) create additional headroom of 350 units.
- Reg. Ref.: SA120136 (extension of Reg. Ref.: SA/60067) – 413 residential units at Bryanstown, none of which were built.

The failure to deliver these units permitted in these ‘committed’ developments results in a further shortfall in the delivery of the unit allocation within the Development Plan core strategy as detailed in Table 3 below.

TABLE 3: TOTAL SHORTFALL IN HOUSING DELIVERY	Units
Total shortfall due to non-delivery of committed units and allocated core strategy Phase 1 (i.e. sum of total shortfalls from Table 1 and 2).	1366
Phase 2 Lands - Beamore / Bryanstown SHD permitted units	250
Available Units without breaching 2014 Core Strategy figures for South Drogheda	1116

Table 3, above, sets out the total shortfall in housing delivery vis a vis the core strategy total, which is calculated by adding the shortfall in ‘committed units’ (from Table 1) and the shortfall in the housing allocation set out in Table 2. The total shortfall in housing units on this basis is 1366 units.

It is considered therefore that the existing Phase I lands (and the lands which were identified as having committed development / extant permissions in place in the Development Plan) have failed to deliver the targets set out in the core strategy. As a consequence of this the town has failed to realise its potential to support sustainable growth over the past development plan period.

As set out in Table 3, we note that permission has recently been granted by An Bord Pleanála for a strategic housing development of 250 units at Bryanstown, Drogheda under Reg. Ref.: ABP-303799-19, on lands which are also subject to a Phase II phasing objective. When this development on Phase 2 lands is taken into account, a deficit of 1116 units remains at present.

The current development proposal provides for 357 units in total.

Therefore, even in the event that the SHD proposal set out herein and the permitted Bryanstown SHD development were developed it would still lead to a total shortfall of c. 759 units under the current 2013-2019 Development Plan allocation (including headroom and taking into account unimplemented / expired ‘committed developments’ as factored into the core strategy calculations).

As outlined previously, a decision on the future proposed strategic housing development will be made in early 2020 on lands which are zoned for housing delivery after 2019. The housing development will be implemented from early 2020 onwards, in accordance with the post 2019 phasing in the Development Plan.

We would respectfully suggest if permission is granted for the proposed development, the scheme whilst on lands designated as Phase II, will still accord with development plan policy to deliver targeted development within the core strategy numerical allocations for the town.

Therefore, the proposed development can be seen to be justified having regard to the failure of the existing Phase I zoned lands and ‘committed developments’ to deliver the targets set out in the core strategy, the location of the site adjacent to education, employment and retail land uses, and its suitability for the masterplan-led development of a new neighbourhood in a comprehensive and ordered manner, and the numerous planning gains to be delivered as part of the development proposal.

Joint Urban Area Plan for Drogheda

The adopted RSES includes objective RPO 4.11 which states the following;

‘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’.

The RSES for the EMRA has been adopted since the Board’s Opinion on the pre-application stage, and designates Drogheda as a major centre for targeted growth.

The RSES notes that the preparation and adoption of a statutory Joint Urban Area Plan (UAP) by Louth and Meath County Councils is to be a priority, however the RSES does not identify a timeframe for the preparation of the Joint Urban Area Plan.

We note the conclusion of the Inspector in this regard in relation to the recently permitted SHD at Bryanstown, Drogheda, Co. Meath under Reg. Ref.: ABP-303799-19 which read as follows:

*‘On balance, I consider that the development of 250 residential units at the subject site will contribute to the achievement of development plan housing targets that have not been achieved to date, on a site that is zoned for development and contiguous to the built-up area of Drogheda. **To consider the development as premature pending the adoption of future development plans and the Joint Urban Area Plan for Drogheda would unduly delay necessary housing development**, particularly given the statement by Meath County Council that the lands are likely to be brought forward as Phase I in the next development plan. The Board have granted permission for SHD developments on Phase II zoned lands in similar circumstances, ref. ABP-300560-18 at Tuam, Co. Galway and ABP-303253-18 at Dundalk, Co. Louth. The proposed development of Phase II lands is considered acceptable on this basis’.*

It is respectfully submitted that this analysis is equally applicable to the subject site at Colp West on which the current SHD proposal is located. These lands have been identified as intended to be brought forward for Phase 1 housing delivery under the forthcoming new County Development Plan. Furthermore, it is likely that there will remain a significant shortfall in housing delivery in Drogheda’s Southern environs which the proposed development will help address. It is submitted that it is appropriate to deliver much needed housing development in this location, and a delay of this housing delivery pending the adoption of the future Development Plan or the Join Urban Area Plan would not be appropriate.

The proposed development is in accordance with the policy objectives set out under the RSES and as such any Joint Urban Plan or review of the County Development Plan will have to have regard to these objectives also. It is expected that a new Draft Development Plan for County Meath will be published in late 2019. In light of this, it is respectfully considered that the proposed development is not premature pending the completion of the County Development Plan Review and preparation of the Joint Urban Plan, and will not prejudice any future Joint Urban Plan for Drogheda that may be prepared by Meath County Council and Louth County Council.

It is considered therefore in response to the concerns expressed in Item 1 of the ABP Opinion that the potential consideration of the proposal as premature (pending the review of both the Louth and Meath County Development Plans process and the preparation of a Joint Urban Plan for Drogheda) and the consequential delay of the development of the subject lands pending same would be detrimental to the ability of the planning authority to meet the housing needs of Drogheda.

Summary and Conclusions

The proposed site is primarily zoned as A2 “New Residential” but is also subject to a separate phasing objective ‘*Residential Phase II Post 2019*’ under the Meath County Development Plan 2013-2019.

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*’.

We note that the Board have granted permission for SHD developments on Phase II zoned lands in similar circumstances, including at Bryanstown, Drogheda (Reg. Ref.: ABP-303799-19), at Tuam, Co. Galway (Reg. Ref.: ABP-300560-18), at Dunshaughlin, Co Meath (Reg. Ref.: ABP-303433-19) and at Dundalk, Co. Louth (Reg. Ref.: ABP-303253-18).

It is considered, as argued successfully in the Bryanstown, Drogheda SHD that a similar justification can be made in this case that the development of phase 1 lands has not been forthcoming within the lifetime of the current CDP and therefore the precedent outlined above is relevant to the proposed Strategic Housing Development.

This section of the report has sought to address potential concerns in relation to the timing and phasing of development in Drogheda Southern Environs and aims to provide a planning rationale and justification for the delivery of the proposed strategic housing development on lands which are designated for development post 2019 (i.e. Residential Phase II).

It is considered that the proposed development of residential units in a key regional growth centre on zoned residential lands, contiguous to existing residential developments (and now linked by a pedestrian bridge over the railway line), should be considered despite the phasing barrier to development provided by the Order of Priority Phasing Arrangement for Residential Zoned Lands outlined in the County Development Plan.

The proposed development provides for an orderly and sustainable extension of the town of Drogheda, on appropriately zoned lands which benefit from permitted infrastructure including access and are proximate to social and community infrastructure such as schools (Gaelscoil an Bhradain Feasa, Drogheda Grammar School, permitted temporary school), employment and retail (Southgate Centre and the recently permitted commercial development at Colpe Road).

In relation to the residential land evaluation, it is considered evident as outlined in Appendix 1, that in any updated residential land evaluation undertaken for the next County

Development Plan the subject site would score more favourably, due to the the factors outlined in Appendix 1 such as permitted infrastructure and road access.

It is considered, based on the analysis undertaken of the phase 1 zoned 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, the current housing shortages being experienced in the region, and the intended development of the site post 2019, that the release of Phase II zoned lands (Post 2019) is justified in this instance. The suitability of the lands for residential development is already acknowledged through its residential zoning.

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, residential zoned lands, which are proposed to be developed post 2019.

The release of Phase II post 2019, A2 zoned residential lands is considered justifiable in this instance given the following;

- Drogheda’s status as referred to above in the NPF, the RSES (Regional Growth Centre) and the Meath County Development Plan (Large Growth Town 1), and the commitment outlined in Project Ireland 2040 (National Development Plan) to provide high-frequency electrified services to Drogheda under the DART Expansion Programme;
- The lack of development of current Phase 1 zoned lands and failure to deliver the targeted growth figures set out in the core strategy during the lifetime of the current development plan which expires in December 2019,
- 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 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.), permitted road infrastructure serving the proposed site and recent permissions granted in the area, including a temporary school;
- ABP precedents in relation to the approval of development on phase II zoned lands, including at Bryanstown, Drogheda, Co. Meath under Reg. Ref.: ABP-303799-19.
- The location and characteristics of the proposed site and its proximity to social and community services, transport and employment.

In conclusion it is considered that this response and associated appendices and the justification set out herein clearly demonstrates that the proposed strategic housing development at Colp West, Drogheda is in accordance with the development management standards set out within the County Development Plan and LAP as well as helping to meet some of the much needed supply of housing for the Drogheda area, which is a designated rent pressure zone.

Furthermore, the proposed development will also help to facilitate the future development of the Mill Road/Marsh Road Area including the provision of enabling infrastructure including a large section of road infrastructure identified in the land use zoning map for the Southern Environs of Drogheda.

The response set out above has provided justification of the proposed development of Phase II residential lands, and has addressed the concern raised about possible prematurity of development at this location pending the review of the CDP and the preparation of a joint urban plan for Drogheda.

In relation to the second part of Item 1, a Statement of Consistency with Planning Policy accompanies this planning application which outlines consistency with the Meath County Development Plan, Section 28 guidelines and National and Regional Planning Guidelines including the adopted RSES for the EMRA. We also note the objective outlined in the RSES for a Joint Urban Plan for Drogheda and make reference to this forthcoming plan herein and in the accompanying Statement of Consistency.

In addition, a Statement of Material Contravention has been prepared which justifies the proposed development with regard to the criteria of section 37(2)(b) of the Planning and Development Act 2000 (as amended). The Material Contravention Statement, along with this Statement of Response to the pre-application Opinion and Statement of Consistency, puts forward further justification for the development of Phase II lands at this location.

In light of the foregoing, it is respectfully requested that An Bord Pleanála have regard to the rationale and justification set out for the development and permit the proposed residential development in contravention of Objective SP1 of the Meath County Council Development Plan 2013-2019, having consideration to section 37(2)(b) (i) and (iii) of the Planning and Development Act, 2000 (as amended), specifically the policies and objectives set out within the Section 28 Guidelines, the failure of the Core Strategy to deliver the required housing units, the national importance of delivering housing given the current housing crisis, and the status of the lands in question as readily developable, sequential and contiguous to the developed footprint of Drogheda, which should be brought forward if Drogheda is to achieve its potential as a Regional Growth Centre.

ITEM 2 – DEVELOPMENT STRATEGY AND DESIGN RATIONALE

Item No. 2 of the Board's Opinion relates to the proposed development strategy and design rationale and states:

'Further consideration and/or justification of the documents as they relate to the overall development strategy and design rationale for the lands, which has regard to inter alia,

- 1. delivery of enabling infrastructure to facilitate access to the development site;*
- 2. the site-specific characteristics of the development site including the 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas;*
- 3. the principles of Design Manual for Urban Roads and Streets including a street hierarchy;*
- 4. the extant permissions and intended/proposed developments within the applicant's landholding contiguous to the site;*
- 5. access and linkages to designated 'WL - commons lands' within the applicant's ownership which are contiguous to the development site;*
- 6. connections over the railway line to Grange Rath development and Southgate located further west*
- 7. provision of appropriately located and functional open space areas;*
- 8. urban design rationale and creation of strong urban streetscapes;*
- 9. unit mix and typology;*

10. *quality of public realm including boundary treatment considerations*
11. *phasing of proposed development.*

Further elaboration including illustrations of how the site analysis/context informed the proposed layout and urban design response would be useful. Further consideration of these issues may require an amendment to the documents and/or design proposal submitted'.

In relation to development strategy the context and background to the proposed development assists in explaining the development strategy and is outlined by way of introduction below.

Urban Design Framework Plan

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 22nd of January 2018. A letter from Meath County Council confirming the validation and approval of the Urban Design Framework Plan accompanies this planning application for information purposes. The UDFP itself is also submitted herewith as part of the application for information.

This Urban Design Framework Plan sets out indicative 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 is the statutory plan for the area in addition to the Meath County Development Plan.

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.

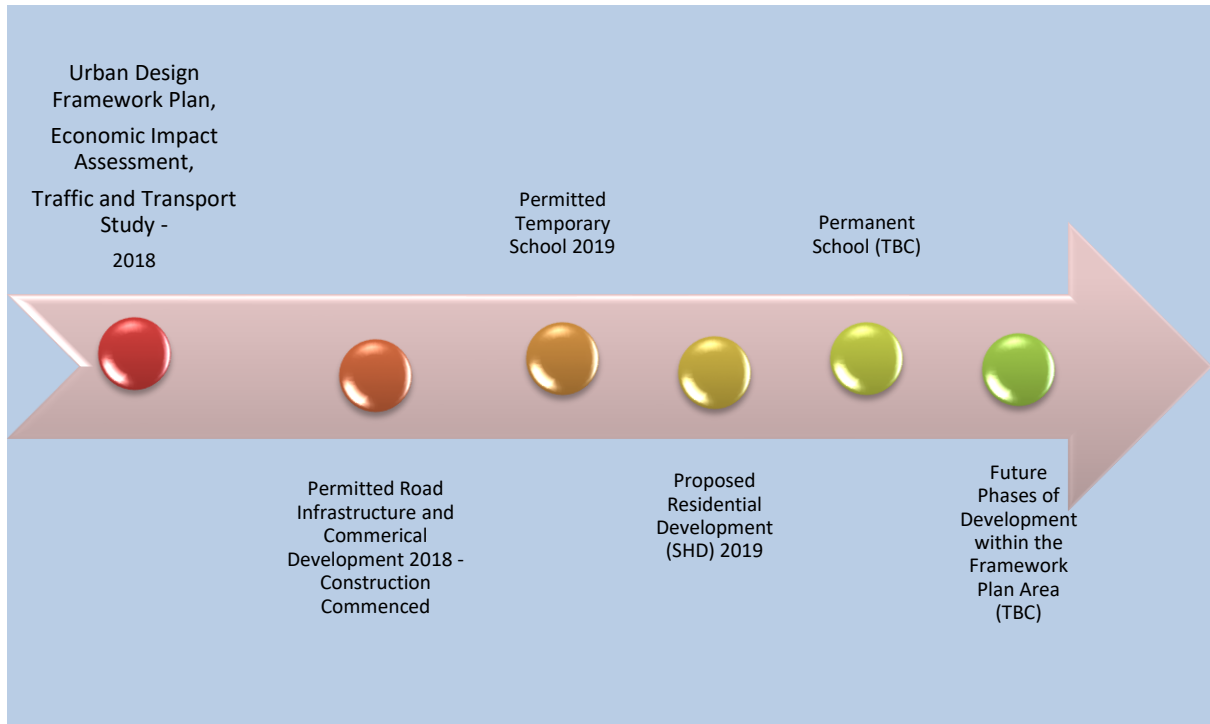
The UDFP provides guidance on the key transportation and movement proposals for the framework plan lands including the new link street through the framework plan lands linking Colpe Road with Marsh Road. The framework plan notes that the proposed link street will connect the plan area to the road network north and south and provide for internal movement within the area.

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 is located within the defined Mill Road/Marsh Road Area has been progressed in accordance with the approved Urban Design Framework Plan.

The UDFP provided the high level framework for the permitted and emerging developments within the Mill Road/Marsh Road Area. As illustrated in the chart below it is considered that the proposed SHD provides the third stage of development of the overall framework plan area, building upon the permitted commercial and associated infrastructure approved by Meath County Council under Reg Ref.: LB 180620 (which provided for the demolition of the existing habitable house and construction of 1 no. 4 storey office building providing a total GFA of 11,205 sq.m, and road infrastructure including a link street approximately 640m in length, including 3 no. roundabout junctions, and a 230m long spur of the link street to the

east to facilitate a connection to the existing school Gaelscoil an Bhradáin Feasa) and the recently permitted temporary school located in the southern portion of the framework plan area.

The figure below demonstrates that the proposed SHD is part of a overall strategy and plan led framework for the development of the overall Mill Road/Marsh Road lands. The proposed SHD builds upon the enabling development and sequencing outlined below including roads, employment development and a new school and is a logical next phase of development within the framework plan for the overall area.



Masterplan

An indicative masterplan for the framework plan area has been prepared by DDA Architects and accompanies this planning application as an appendix to the DDA Architects Design Statement. The illustrative masterplan builds upon the high level guidance set out in the Urban Design Framework Plan to provide a coherent structure and layout to guide the future growth and development of individual land parcels within the Mill Road/Marsh Road area. It is noted that this masterplan has been prepared for information purposes only. Any future development on the masterplan lands to be delivered by others will be subject to separate planning applications, Environmental Impact Assessment(s) and Appropriate Assessment(s) as required.

The purpose of the masterplan is primarily to illustrate that the proposed development does not prejudice the potential future delivery of development on adjoining lands by others, and that the proposal fits well into a potential future layout for the development of the wider area.

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 permitted temporary school and the permitted and proposed housing developments located between the Mill Road/Marsh Road Area and Drogheda Train Station which in combination with the development of the Mill Road/Marsh Road area will assist in bridging the gap in Drogheda's urban form.

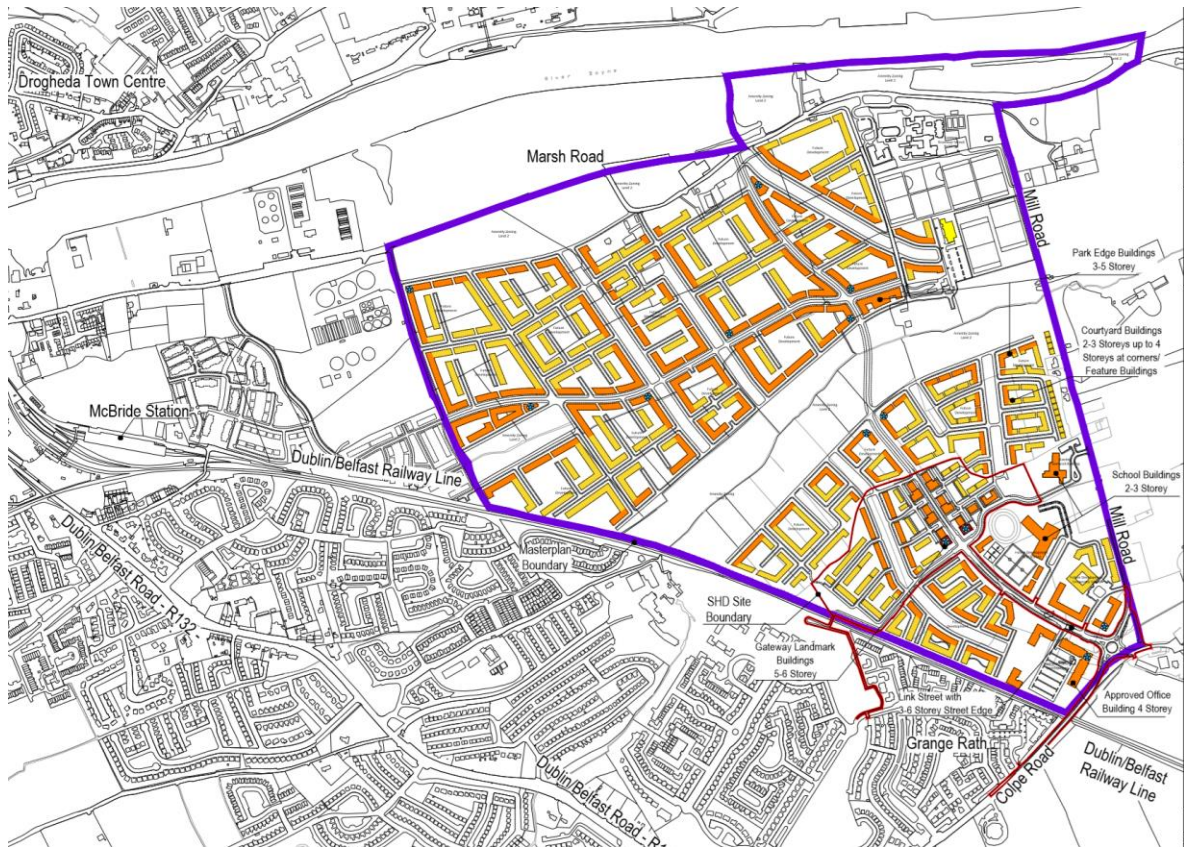


Figure 2.3: Mill Road/Marsh Road Masterplan

The masterplan provides illustrative guidance on the future urban form and layout of the Mill Road/Marsh Road lands including an illustration on potential future 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.

The masterplan demonstrates how the overall Mill Road/Marsh Road area can 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).

The masterplan provides for green corridors/linear parks through the wider masterplan lands, providing a movement and recreation function for the wider area and facilitating future connections for both pedestrians and cyclists.

The masterplan includes a short term and long term linkages plan prepared by DBFL Consulting Engineers which illustrates the public transport options and movement framework in the short term following completion of permitted and proposed developments in the southern portion of the lands; and in the long term following completion of the north-south link street and east to west link to the train station and Drogheda Town Centre.

The linkages plan illustrates the range of transport options available including the Matthews bus service on Colpe Road, Bus Eireann services on Marsh Road and Drogheda Train Station to the west.

The masterplan illustrates how the Mill Road/Marsh Road area can be developed as a sustainable community and a suitably integrated urban expansion of the town of Drogheda. It includes a location for a potential permanent school to the south of the existing Gaelscoil,

to the south-east of the subject site and to the north of the recently permitted temporary school.

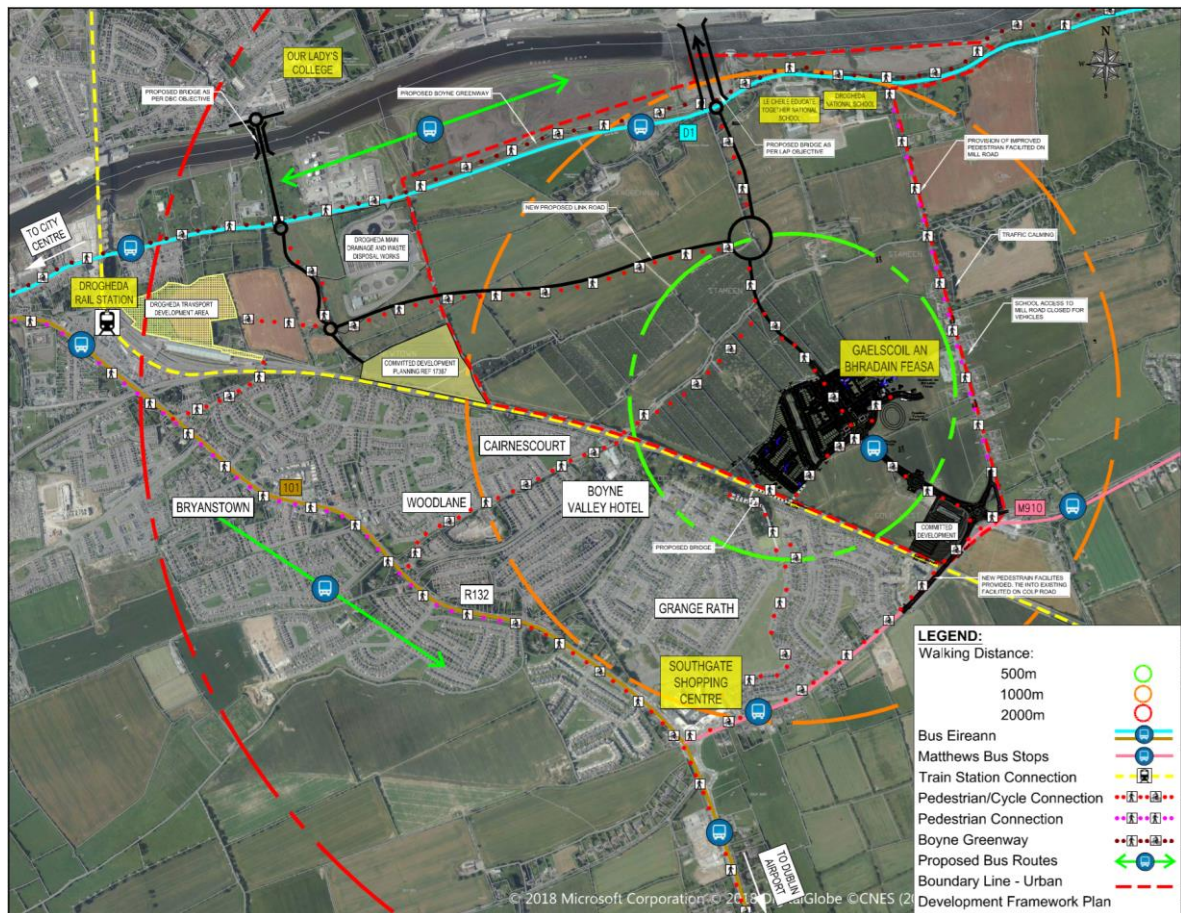


Figure 2.4: Long Term Linkages Plan

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 development also provides important infrastructure which benefits the wider area, including a new pedestrian and cycle bridge crossing of the railway line adjacent to the SHD site. 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.

- ***Delivery of enabling infrastructure to facilitate access to the development site;***

In relation to this item, we note ABPs concern regarding the delivery of the enabling road infrastructure to facilitate access to the development site (permitted under Reg Ref: LB/180620) and note the ABP Opinion states *'the prospective applicant should be satisfied that these works will be complete /substantially complete prior to making an application'*.

In response to this concern we wish to note that the construction of the enabling road infrastructure permitted under Reg Ref: LB/180620 commenced on site in July 2019. The applicant has also included the road infrastructure in the red-line boundary (as illustrated below in Figure 2.4) of this application and proposes to modify aspects of the permitted road infrastructure including the omission of 2 no. roundabouts and the introduction of priority junction arrangements. This development therefore incorporates all necessary infrastructure to access the proposed development.



Figure 2.5: Enabling Infrastructure included in red line boundary

The road infrastructure includes a 230m long spur off of the link street to the east to facilitate a connection to the existing school on Mill Road (Gaelscoil an Bhradáin Feasa).

It is noted that the school as permitted allows for future access from the proposed new Mill Road/Marsh Road link road to the west. 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'

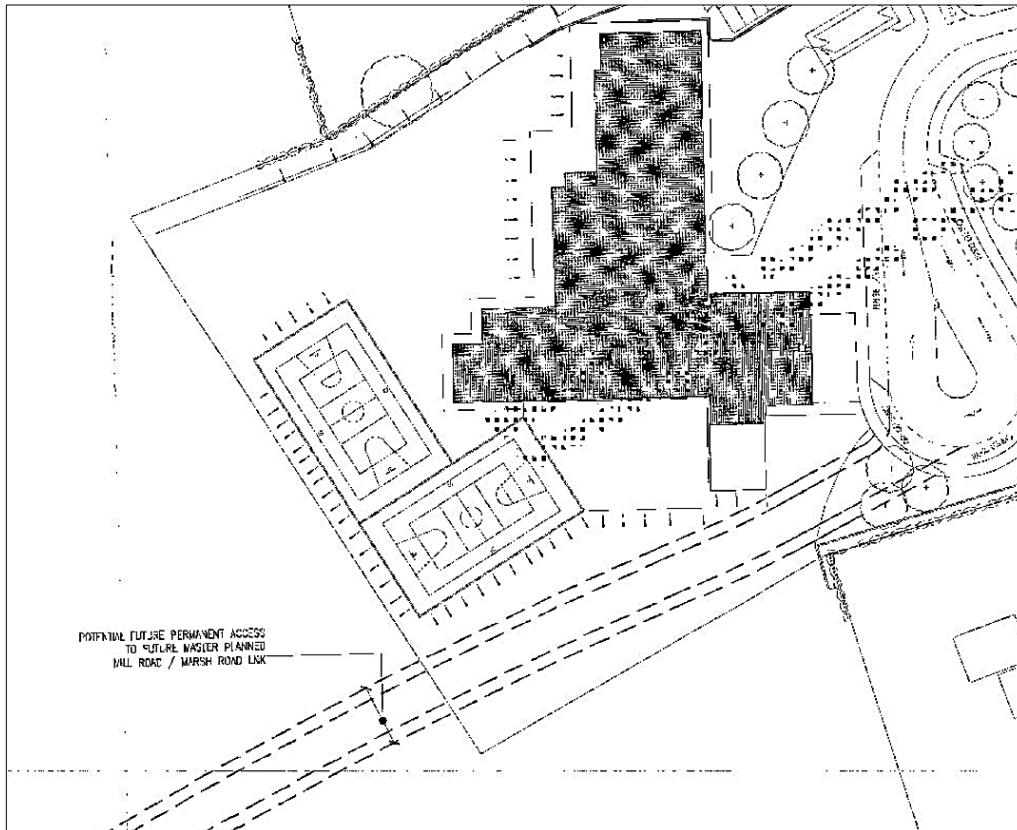


Figure 2.6: Drawing C-005 revision PL1 – Potential Future Access Road Layout Plan

The proposed development of the link road included in this application fulfils the aims of the condition outlined above, facilitating access to the existing school from the Mill Road/Marsh Road Link Road, allowing the existing vehicular access to Mill Road to be closed and thereby providing for a decrease in school related traffic on Mill Road and an improvement in residential amenity for Mill Road residents.

It is considered that the information outlined above in addition to the accompanying site layout drawings which illustrate the inclusion of the enabling road infrastructure to facilitate access to the development site addresses the concern expressed by ABP in this regard.

- ***The site-specific characteristics of the development site including the 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas;***

The accompanying Architectural Design Statement addresses in detail the site-specific characteristics of the development site including the 12 criteria set out in the Urban Design Manual.

- ***The principles of Design Manual for Urban Roads and Streets including a street hierarchy;***

The principle design guidance of DMURS has been considered in the design of this development. As demonstrated in the accompanying DMURS Consistency Statement Design accompanying this planning application, the internal road network has been designed to deliver a hierarchy of local streets that provide access within / across the proposed new residential community and between the Link streets adjacent to the site.

The movement function of each of internal local street has sought to respect the different levels of motorised traffic whilst optimising access to/from public transport and catering for higher number of pedestrians and cyclists. In parallel the adopted design philosophy has

sought to consider the context / place status of each residential local street in terms of level of connectivity provided, quality of the proposed design, level of pedestrian / cyclist activity and vulnerable users requirements whilst identifying appropriate ‘transition’ solutions between different street types.

High levels of internal connectivity are also delivered for motorised vehicles, albeit at slower speeds to that achievable along the external Link streets. The layout offers a well-connected traffic calmed ‘by design’ street network. In addition to pedestrian / bicycle facilities at the adjacent approved link street, the provision of a dedicated pedestrian / bicycle connection through the linear park and other open space areas maximise permeability along key travel desire lines thereby delivering convenient, attractive and safe linkages for pedestrians and cyclists.

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, homezones 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.

DMURS features as set out in the DMURS Consistency Statement provided by DBFL include:

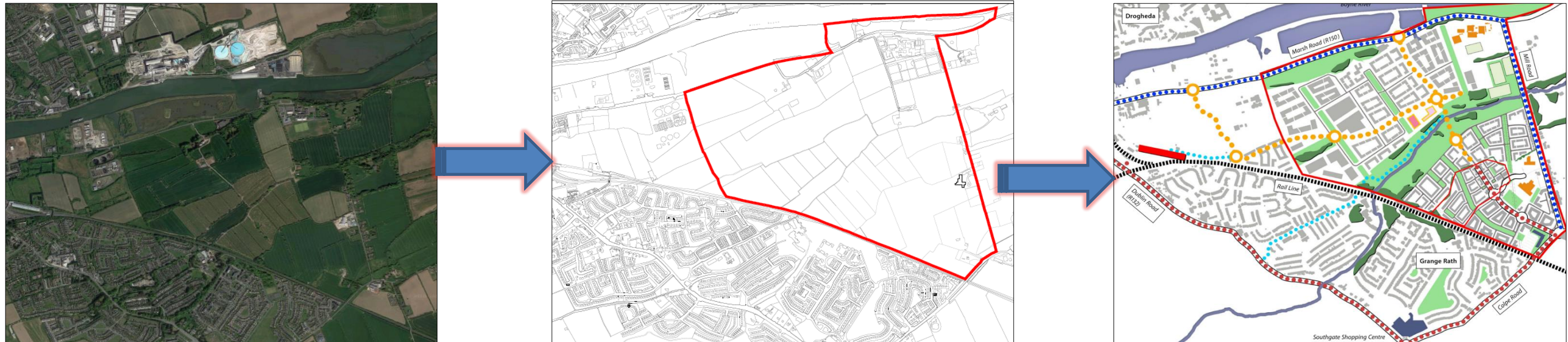
- A strong sense of street enclosure is achieved utilising the adopted building height to street width ratios internally; in parallel with the provision of street trees.
- The potential dominance of on-street car parking for the apartment area is actively management through the provision of landscaped 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 network

- **the extant permissions and intended/proposed developments within the applicant's landholding contiguous to the site;**

It is considered beneficial under this heading to outline the context of development in the surrounding area which is considered fundamental to the development strategy and overall integration of the Mill Road/Marsh Road area into the urban form of the town. This section will also detail the sequencing of the extant permissions, proposed development and future development within the Mill Road/Marsh Road area.

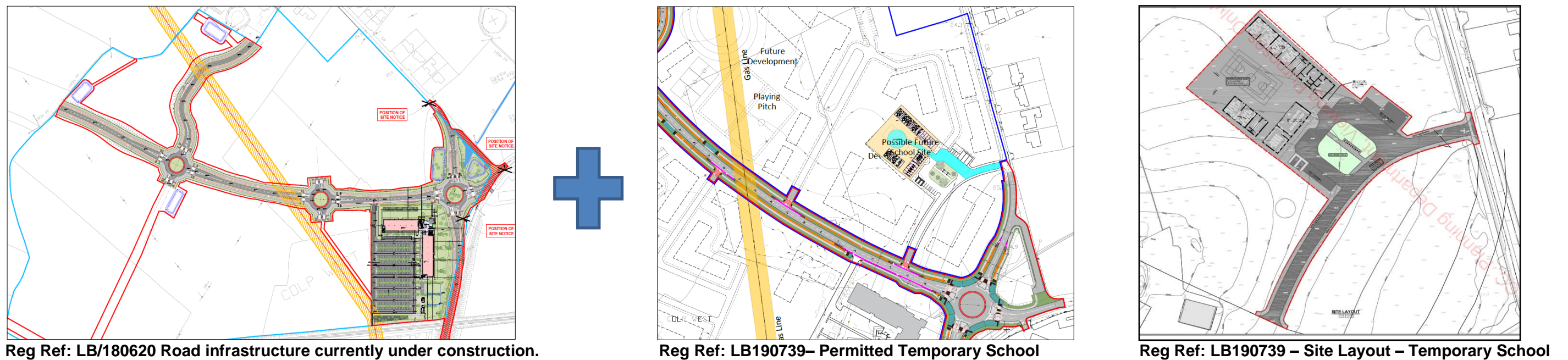
Firstly the development context in terms of the expected future growth of Drogheda and the permitted and proposed development in the surrounding area, as presented herein demonstrates that the proposed development site is not isolated from Drogheda's urban form but is a logical and sequentially appropriate next stage in the urban expansion of the town, and is an important facilitator to unlock the potential of the wider Mill Road/Marsh Road area, and ultimately help assist Drogheda to meet RSES objectives for a population of 50,000 in the settlement of Drogheda by 2031. The proposed SHD will constitute the third phase in the development of the Mill Road/Marsh Road area with construction work currently ongoing to provide the enabling road infrastructure and planning permission granted for a temporary school to the south of the proposed SHD.

Development Strategy



In relation to the extant permissions and intended/proposed developments within the applicant's landholding contiguous to the site, we wish to note that the road infrastructure and commercial development (shown below) permitted under Reg Ref: LB/180620 is currently under construction.

Extant Permissions



Reg Ref: LB/180620 Road infrastructure currently under construction.

Reg Ref: LB190739– Permitted Temporary School

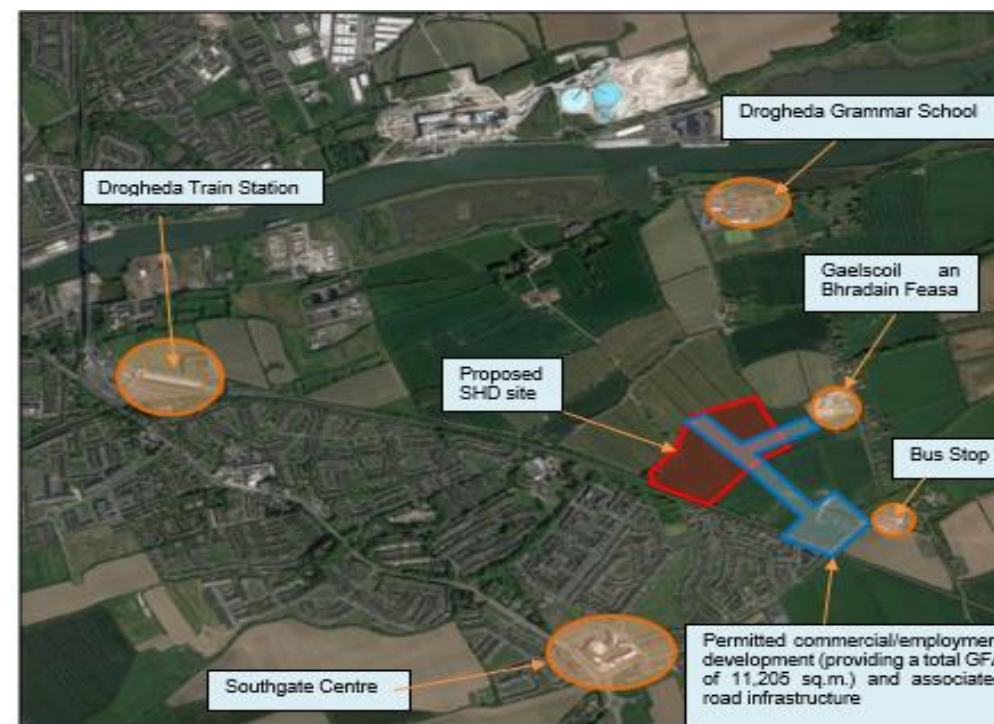
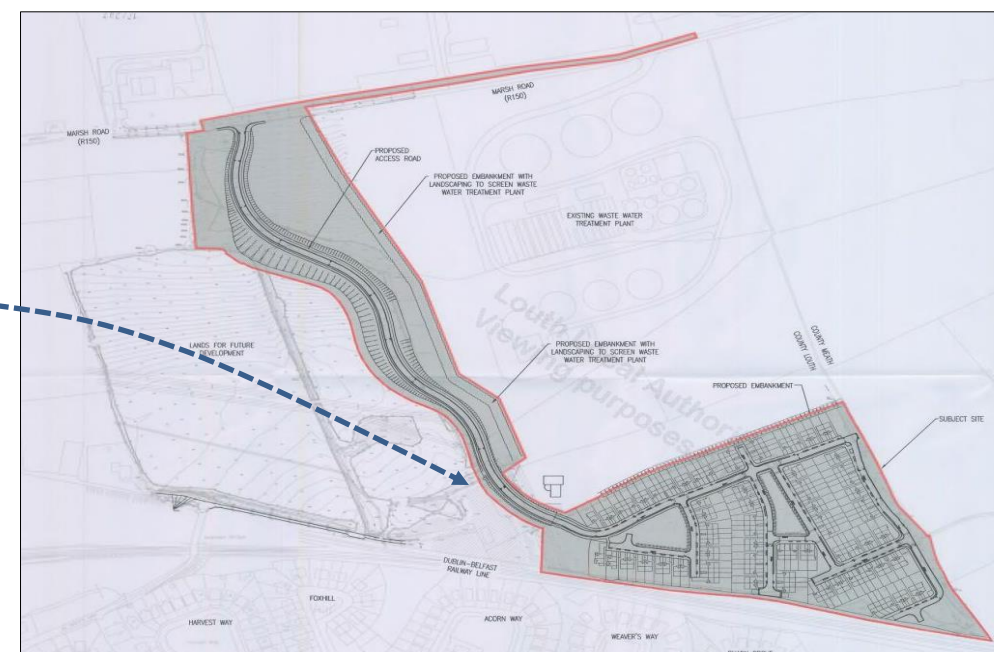
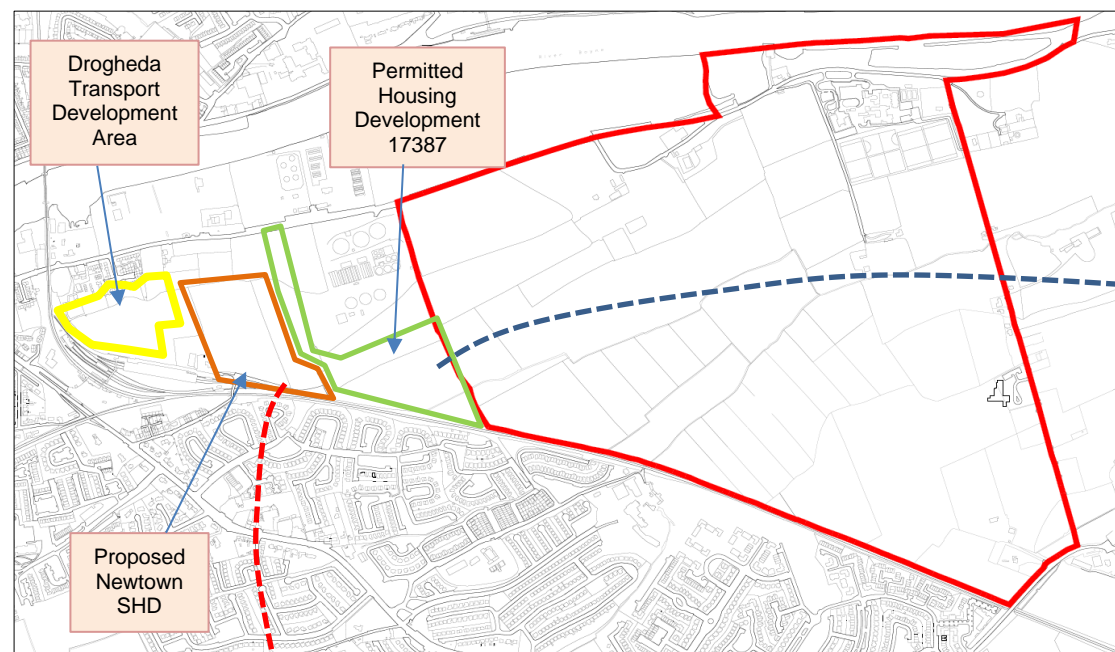
Reg Ref: LB190739 – Site Layout – Temporary School

The permitted temporary school (duration of 5 years) at Mill Road, Colp West, Drogheda (Reg Ref: LB190739) consists of 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.

The school was permitted on the 16th of September 2019 under Reg Ref: LB190739 and is expected to commence construction in Q1 2020. We note that the access from Mill Road is to be removed when the proposed link street is delivered.

Permitted and proposed development in the surrounding area

As set out above the context of development in the surrounding area is considered fundamental to the development strategy and overall integration of the Mill Road/Marsh Road area into the urban form of the town. The Mill Road/Marsh Road Area can be seen to be the missing wedge required to sequentially ‘fill in’ Drogheda’s urban form. Whilst there appears to be underutilised sites east of Drogheda Train Station which are better located sequentially, an analysis of permitted and proposed developments in the area reveals that in fact these lads are in the process of being developed, as per Reg. Ref.: 17387, or progressing through the planning system (as per the Newtown SHD), and Drogheda’s urban form is moving eastwards to meet the Mill Road/Marsh Road quarter, stitching and mending together the urban fabric.



Potential developments within the applicant's landholding contiguous to the site

In relation to the Mill Road/Marsh Road area, it is evident that having regard to the recent planning history and lack of development during the lifetime of the development plan that the instigation of the development of this new urban quarter of Drogheda will not come from the northern section of the Mill Road/Marsh Road area, due to significant infrastructure constraints amongst other factors. It is clear that whilst development is moving eastwards towards the area, the southern section of the Mill Road/Marsh Road area, which contains permitted road infrastructure, a school and employment development and is located proximate to the Southgate Centre, will be the initial driver of and catalyst for development in the area, and that the phasing of development in the area will move from south (Colpe Road) to north (Marsh Road).

The image below illustrates the proposed SHD in context with the potential masterplan for the southern section of the Mill Road/Marsh Road area. As noted above a temporary school is permitted to the north of the permitted commercial development and will be provided with an access off the proposed link street. In addition a permanent school is intended to be developed as illustrated below to the south of the existing Gaelscoil and south east of the proposed SHD.

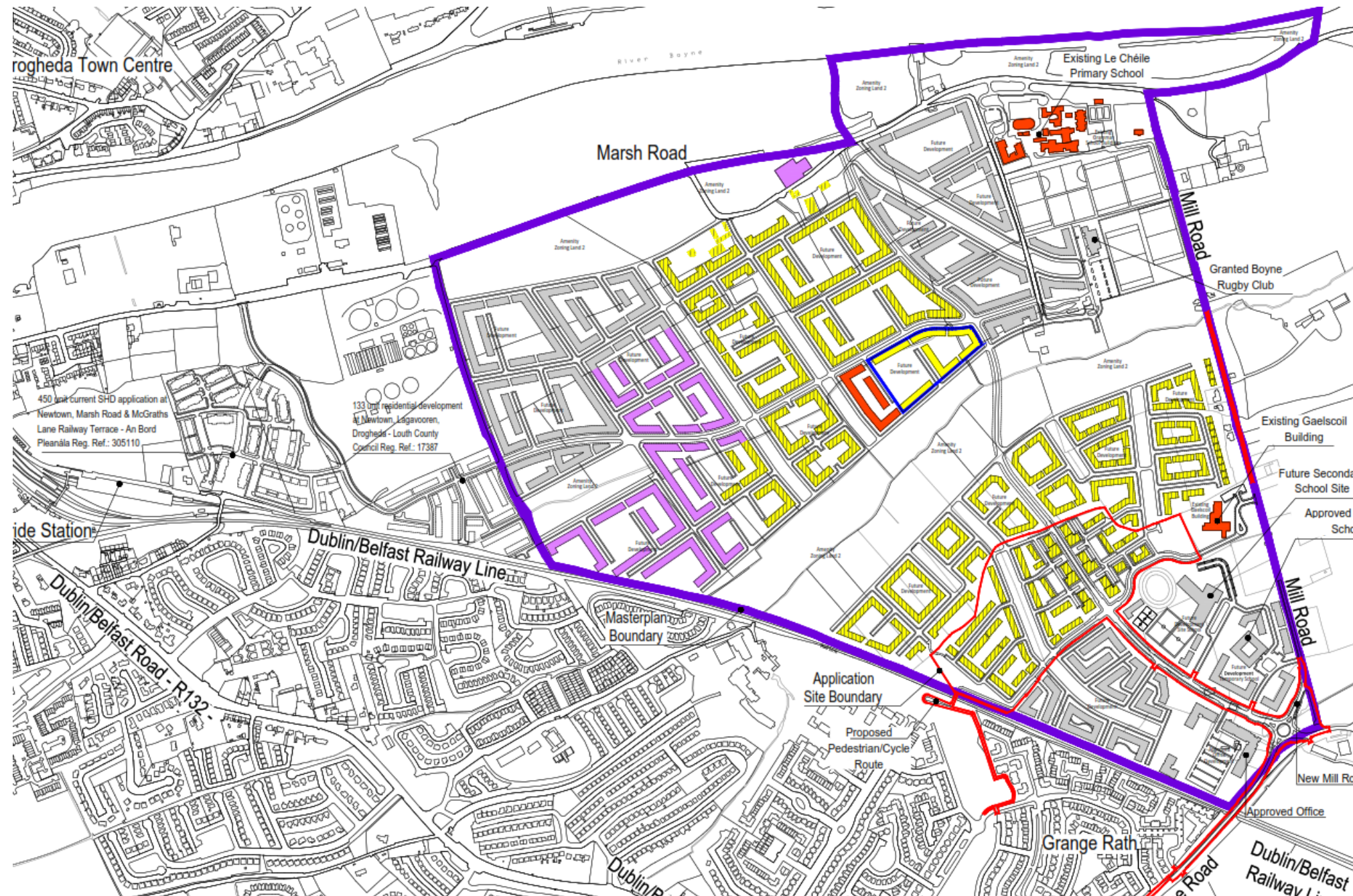


Figure 2.8: Extract from indicative masterplan drawing

- ***Access and linkages to designated 'WL - commons lands' within the applicant's ownership which are contiguous to the development site***

The final application includes the WL zoned lands to the east of the residential element of the development and to the west of the existing adjacent school. These WL zoned lands adjoin the childcare facility within the scheme and will remain open and substantially undeveloped. No residential development is proposed on these lands; however they will exist as a landscaped area adjoining the development, albeit they are not relied upon to meet the open space requirements of the proposed residential development. They are additional to the open space requirements of the residential scheme and are included so as to provide an appropriate linkage and to ensure an orderly and appropriate pattern of development.

The roadway proposed through this element of WL zoned land is necessary to provide a link with the permitted access link with the SHD site which forms part of the permission for the adjoining school (which is currently only accessible from Mill Road). A temporary pumping station is also proposed on this part of the site, which 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.

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 landscaped link with the existing school, and to avoid the pocket of WL zoned land at this location remaining as an undeveloped and unattractive 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.

Thus, the proposed development integrates with the WL zoned lands, while also according with the zoning objective of these lands., which is to protect such lands from inappropriate forms of development and to allow for a long term, integrated approach to the expansion of the urban area. The proposed development is wholly compliant with these objectives. The Statement of Consistency and Planning Report submitted herewith deals with the zoning of the subject site in further detail.

- ***Connections over the railway line to Grange Rath development and Southgate located further west***

In response to this point within the Board's Opinion, the proposed development now includes the provision of new pedestrian and cycle bridge connection over the railway line to the adjacent Grange Rath Development, thereby providing a connection onward to the Southgate Centre from the proposed development.

This new connection will also serve to effectively knit the proposed development into the existing built up area of the town, which the subject site is contiguous with.

The design and positioning of this new pedestrian and cycle bridge over the railway line has been agreed with the operator of the railroad, Iarnród Eireann, following detailed consultation. The application is accompanied by a letter of consent from Iarnród Eireann, which provides for the inclusion of the necessary lands as part of the planning application.

The inclusion of the new railway bridge will significantly enhance the permeability of the wider area and the accessibility of the proposed development. Furthermore, the new linkage will make it possible for residents of the adjoining Grange Rath development and further afield to walk and cycle to access the existing and permitted schools at Mill Road, via the internal cycle and pedestrian network within the proposed development. This is considered to constitute a significant planning gain.

- ***Provision of appropriately located and functional open space areas;***

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.

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.

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.

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.

The area of open space adjoining the railway line performs a key function in allowing for a considerable recreation space for the houses towards the western end of the scheme, allowing for an adequate setback from the adjoining railway line, and allowing for the important new linkage across the railway line – this area of open space also ties in effectively with the wider indicative strategy set out within the Masterplan document.

The eastern side of the scheme incorporates an area of open space located on WL zoned lands, which are in addition to the open space requirements for the residential scheme, but which will further enhance the amenity of the overall area and allow for an effective interface with the adjoining existing school development, to which a link is proposed.

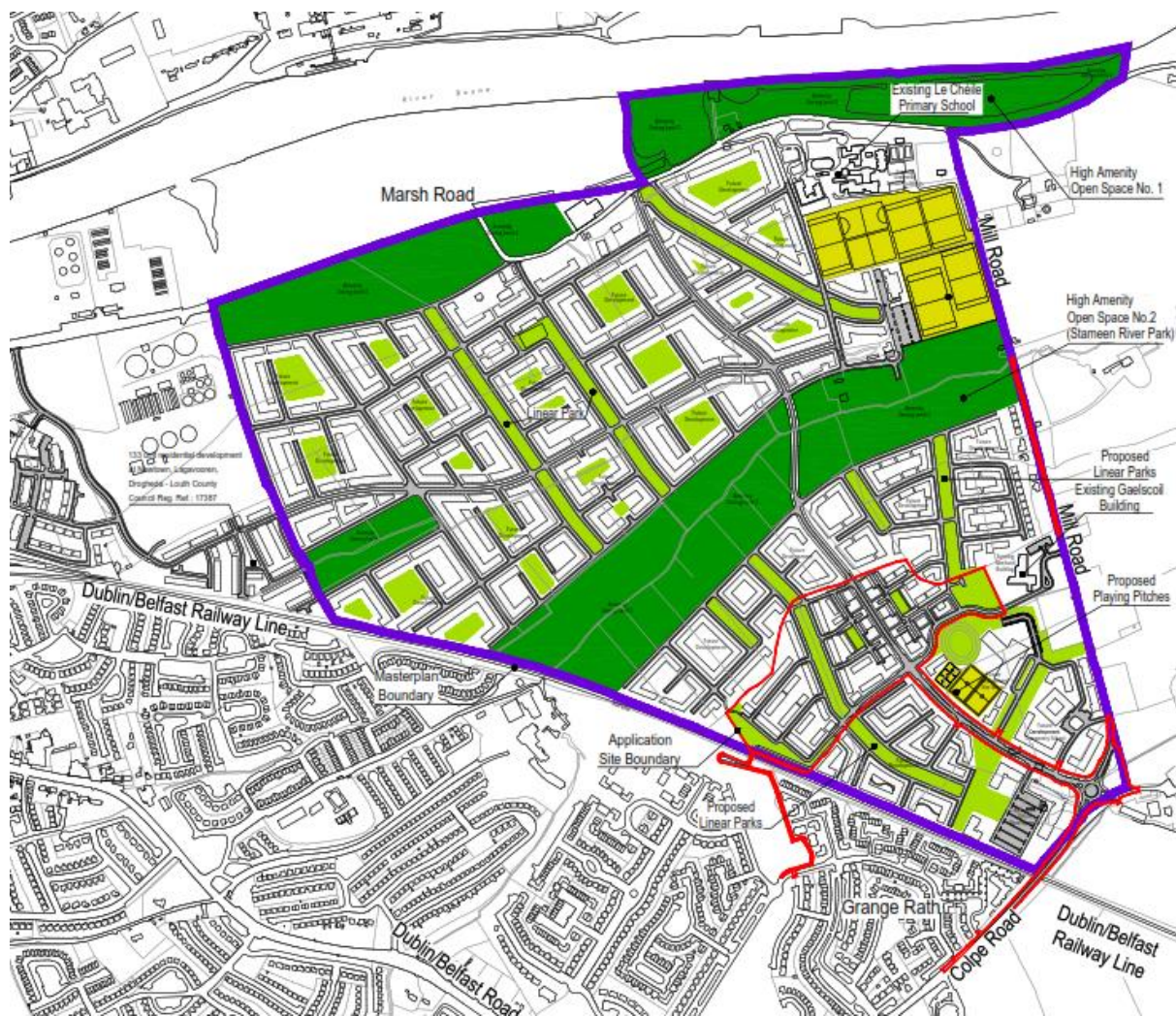


Figure 2.9: The illustrative masterplan sets out how the proposed open spaces can fit into a wider network of open space

The open space proposed as part of the scheme is laid out in such a way that the future development of lands to the north of the subject site can provide for the expansion and continuation of the open spaces within the scheme, as illustrated in the accompanying illustrative masterplan. Thus, the open spaces within the scheme will form part of a broader future network of open spaces, and facilitate the realisation of this network subject to future planning applications.

In the interim it is considered that the high quality open spaces within the scheme are well considered and appropriately located to provide for a high standard of amenity for future residents and visitors alike.

The open spaces are functional having regard to the inclusion of play areas, walking routes and cycle infrastructure along desire lines through the scheme. This will ensure that these spaces are well used and remain activated throughout the day.

- ***Urban design rationale and creation of strong urban streetscapes;***

As set out within the accompanying Statement of Consistency and Planning Report and the Architectural Design Statement prepared by DDA Architects, the final scheme now proposed represents a design predicated on the principles espoused in the Urban Design Manual and the Design Manual for Urban Roads and Streets.

The proposal presents a range of character areas, each with varying design characteristics, materiality and layouts.

The provision of strong urban edges to higher order and wider internal streets has been prioritised within the scheme. The main link street which bisects the development will be appropriately enclosed by a series of residential buildings rising to a maximum of six storeys in height. These buildings, in combination with well placed street trees will ensure that this key street maintains an urban feel and a definite sense of place.

Several other key design moves within the scheme also promote the creation of strong urban streetscapes. These include the introduction of corner duplex / apartment typologies which provide a step up at key corners, assisting in wayfinding and legibility while also ensuring greater passive surveillance of junctions.

Housing unit typologies have been predicated on the need to ensure that units at the end of streets turn the corner on which they are located, to provide an active frontage onto the public realm. This has led to the inclusion of a significant number of context-specific housing types within the overall development (as demonstrated in the accompanying DDA architectural drawing pack).

The mix of housing types, heights and designs within the scheme promote a sense of place and variety throughout. Streets are visually interesting, with an attractive sense of visual rhythm punctuated by variations in building type and height.

The development promotes linkages with surrounding lands, including direct linkages with adjoining existing and permitted schools, and a new pedestrian and cycle linkage across the adjacent railway line to Grange Rath and onward to the Southgate Centre.

The development also provides a series of high-quality open spaces, all of which benefit from good levels of passive surveillance from residential units fronting onto these spaces. The design rationale for the open space within the scheme is set out in detail within the Landscape Design Rationale statement prepared by Dermot Foley Landscape Architects.

For further details in relation to the urban design rationale for the development, and for an assessment of the scheme under each of the relevant headings of the 2009 Urban Design Manual, please refer to the Architectural Design Statement prepared by DDA Architects.

- ***Unit mix and typology***

As set out within the Statement of Consistency and Planning Report submitted herewith, 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.

The unit mix and typologies within the scheme have been subject to further consideration by the design team, with some amendments made to the mix of units *vis a vis* the pre-application submission to the Board.

It is respectfully considered that the resulting unit mix on site is appropriate given the location and context of the site, and the existing housing demand in the area, to which the proposed development seeks to respond.

The 357 no. residential units proposed consist of 169 no. houses, 52 no. duplex units and 136 no. apartments.

The 169 no. houses will consist of the following:

- 104 no. 3 bedroom units
- 65 no. 4 bedroom units

The 136 no. apartment units will consist of the following:

- 58 no. 1 bedroom units
- 78no. 2 bedroom units

The 52 no. duplex units will consist of the following:

- 52 no. 3 bedroom units

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.

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.

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

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.

- ***Quality of public realm including boundary treatment considerations***

It is intended that the proposed development will provide public realm of a high standard throughout. Streets will be animated by the considered design of buildings facing onto the public footpaths and cycleways, and the open spaces within the scheme, also providing for passive surveillance and a feeling of safety.

The materials utilised within the buildings themselves, which define the edges of the public realm, will comprise of high quality, durable finishes with variation across unit typologies and character areas.

Street trees are used throughout the scheme and within the public spaces to provide a leafy, sylvan feel to the overall development. This planting also enhances the sense of enclosure on

routes through the development, making the public realm feel more welcoming and human-scaled.

In terms of pedestrian and cycle facilities, the DBFL and DDA drawing packs submitted herewith clearly illustrate the high standard of provision within the scheme. The commitment to quality pedestrian and cycle infrastructure is exemplified by the important new pedestrian and cycle bridge which will link with the existing built up area of the town to the southwest of the subject site.

The car parking within the scheme has been carefully integrated into the overall layout and design, and car parking spaces will not appear overly dominant in views within the scheme.

As set out within the DDA Design Statement, the 'calmed by design' streets within the scheme deliver safe, convenient, and attractive networks, in accordance with the parameters set out in the Design Manual for Urban Roads and Streets (DMURS). Pedestrian and cycle routes are provided along key desire lines, particularly to the central linear park.

Three large open spaces, with play areas, seating, walking routes and extensive planting are provided within the scheme. The central linear park provides for a range of activities and is a key wayfinding element of the layout. Two further large open spaces are provided, one to the east and west of the development. Several smaller urban parks are interspersed with housing. All these areas are designed to be safe and welcoming as passive supervision is provided by the adjacent housing.

In terms of boundary treatments, the DFLA drawing pack includes specific details of the boundary treatments proposed, which will delineate the boundaries between the public and private realms within the development. Clear boundaries are important in this context, to ensure a sense of ownership over the private curtilages of individual residents (leading to a higher standard of upkeep by future residents) and a sense of shared ownership of public spaces, which should be comfortable and inviting to use for all (both residents and visitors alike, or just children passing through to access the schools adjoining the site).

- ***Phasing of proposed development.***

As set out within the accompanying Statement of Consistency and Planning Report, the phasing of the proposed development has been carefully considered by the project design team and the applicant, in order to provide for key infrastructure including the link bridge at the earliest appropriate opportunity, while ensuring that adequate passive surveillance is provided to allow for the safe operation and use of this infrastructure. The phasing also seeks to provide for an appropriate range of unit types and sizes within each phase of the development.

The phasing of the proposed development is as follows:

Phase 1

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.

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).

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.

The first phase of development will also include 7 no. of the 36 no. proposed Part V units.

Phase 2

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.

The second phase of development will include a mix of houses, apartments, and duplex units which also includes 14 Part V units.

Phase 3

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.

ITEM 3 – ENABLING ROAD INFRASTRUCTURE AND ACCESS TO SITE

Item No. 3 of the Board's Opinion states:

'Further consideration and/or justification of the documents as they relate to enabling road infrastructure providing access from Colpe Road to the development lands. While these enabling works were subject to a previous application Planning Reg. Ref. No. LB/180620 and as this permission has yet to be implemented, the prospective applicant should be satisfied that these works will be complete/substantially complete prior to making an application. Consideration may need to be given to their inclusion within the red-line boundary of this application where the road infrastructure has not advanced at time of making an application. In this regard, further consideration should be given to the street hierarchy and function of roads including improvements in the roads layout and/or junction designs to ensure compatibility with the principles set out in DMURS in the interests of all road users.'

The enabling road infrastructure providing access to the proposed SHD site has been included within the red line boundary of this application, to ensure the delivery of this important road infrastructure to serve the proposed development and the wider area.

Further consideration has been given to the street hierarchy and function of roads and 2 of the permitted roundabouts have been altered to priority junctions to address ABP concerns and ensure compatibility with the principles set out in DMURS.

The final planning application is accompanied by a DMURS compliance statement prepared by DBFL Consulting Engineers, which confirms that the amended road layout to serve the proposed development and within the proposed residential area is in accordance with the principles of DMURS.

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.

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 managed 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.

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.

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.

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.

ITEM 4 – CONNECTIONS AND LEGIBILITY

Item No. 4 of the Board's Opinion states:

'Further consideration should also be given to the documents as they relate to vehicular, cycle and pedestrian connections, legibility and permeability to and through the site. A pedestrian/cycle connection from the development site over the railway line to Grange Rath and Southgate (further west) should be considered so as to assist in the integration of the lands/orderly phasing of development pending the timely delivery of further community/neighbourhood services identified in the masterplan lands. Consideration of the passive surveillance of these connections should also be considered.

Further consideration of this issue may require an amendment to the documents and/or design proposal submitted'.

In response to Item 4 of the ABP Opinion and discussions in the Tri-Partite meeting, the proposal now includes a pedestrian and cycle bridge over the Belfast-Dublin railway line. The proposals have been developed following detailed consultation with Irish Rail and will ensure that the proposed Strategic Housing Development is appropriately integrated with the adjoining existing built up area of the town at Grange Rath.

This new proposed connection will significantly enhance pedestrian and cycle connectivity and encourage the use of these more sustainable transport modes by occupants of the proposed development.

This new bridge also provides for an important new linkage with the existing and permitted schools on Mill Road, which will be accessible from the existing built up area of the town via the proposed development. This new route will cut significant distance and time from the journey to access these schools, and will make them accessible via high quality pedestrian and cycle infrastructure, thereby avoiding a more circuitous route along Colpe Road.

For many residents within the existing built up area to the west and southwest of the subject site (on the opposite side of the adjacent railway line), the distance walked / cycled to access the existing Gaelscoil an Bhradain Feasa would be reduced by c. 1 kilometre – thereby reducing a c. 2-2.5 kilometre journey to c. 1-1.5 kilometres. This is considered to constitute a significant planning gain, both for the immediate vicinity of the development proposal and the wider area.

It is expected that this new access route will enable a modal shift for school going children in the adjoining existing residential areas towards cycling and walking via the proposed development. As set out previously, the development provides for the realisation of a linkage with Gaelscoil an Bhradain Feasa, which was provided for within the planning permission for that school under Reg. Ref.: SA130927 & ABP Reference: PL17.243331. The enabling road infrastructure (which has now been brought within the red line for the SHD, including updates to the previously permitted road layout) also provides for a new linkage / access for the permitted temporary secondary school at Mill Road (Reg. Ref.: LB1907390).

The bridge which forms part of the application will also allow for a direct route from the proposed development to the range of amenities, facilities, and retail offer within the Southgate Centre.

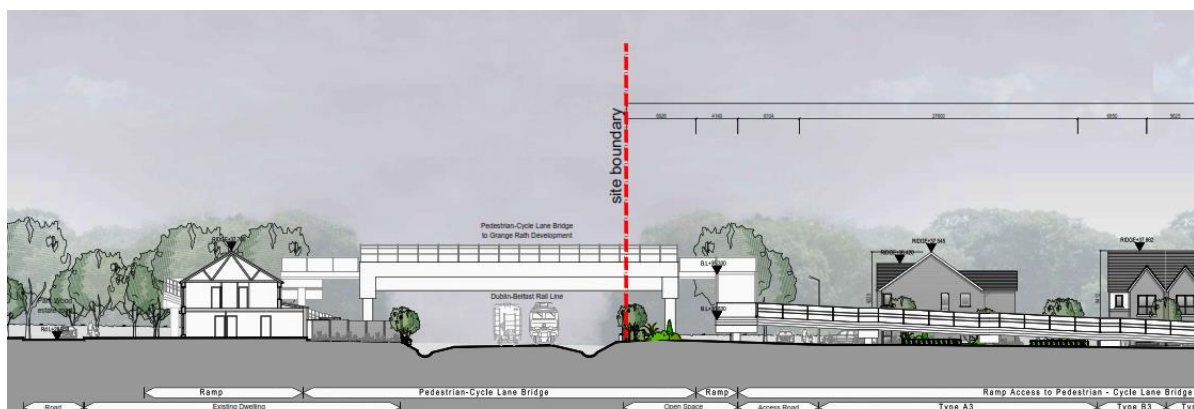


Figure 2.9: Extract from DDA Contextual Site Section M-M (drawing no. 19-001-P-1.105), which illustrates the proposed pedestrian and cycle bridge in the context of proposed and adjoining development

The passive surveillance of the new pedestrian and cycle bridge and associated access routes has been carefully considered within the application documentation submitted herewith, including within the phasing proposals for the development. As set out within the Statement of Consistency and Planning Report, the proposed new bridge over the railway line will be overlooked by nearby housing to ensure that it is safe to use and a comfortable route for pedestrians and cyclists to traverse.

It is proposed to deliver housing closest to this important new linkage during the initial phase of the proposed development (i.e. ensuring that the bridge and pedestrian and cycle link, which will follow at the latter stage of the first phase of development, will benefit from passive surveillance from the outset of their operation).

The link with Gaelscoil an Bhradain Feasa has also been carefully considered in terms of its safety and surveillance. While no residential development is proposed on the WL zoned lands which this connection traverses, the closest built element of the scheme (the block which includes the childcare facility) provides a good level of passive surveillance via the inclusion of apartment units at first floor level, which directly overlook this new linkage and the adjacent open space.

The internal layout of the proposed development seeks to enhance and emphasise permeability and accessibility for the future residents of the proposed development and for residents of surrounding area.

ITEM 5 – SURFACE WATER MANAGEMENT AND RISK OF FLOODING

Item No. 5 of the Board's Opinion states:

'Further consideration of documents as they relate to surface and storm water management for the site. This further consideration should have regard to the requirements of the Council in respect of surface water treatment and disposal as set out in section 7.6.2 of the Planning Authority's opinion. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of 'The Planning System and Flood Risk Management Guidelines' (including the associated 'Technical Appendices'). In this regard, consideration should be given to objective Flood Risk FR POL 3 in the Drogheda Southern Environs Local Area Plan. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted'.

The Infrastructure Design Report / Engineering Services report prepared by DBFL Consulting Engineers which is submitted as part of this planning application includes a response to the foregoing item of the Board's Opinion.

The surface water management proposals forming part of the final development proposal have been prepared and considered in the context of a detailed Flood Risk Assessment (which was also prepared by DBFL Consulting Engineers and which is submitted herewith).

Section 7 of the DBFL Infrastructure Design Report also provides an individual response to each of the points raised within section 7.6.2 of the Planning Authority's opinion from pre-application stage.

For further details in this regard, please refer to the DBFL Infrastructure Design Report, Flood Risk Assessment Report, and associated engineering drawing pack.

3.0 STATEMENT OF RESPONSE TO SPECIFIC INFORMATION REQUIRED

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development.

Item No.1 – A masterplan which contains the zoning objectives for this area super-imposed to determine consistency with land use zoning objectives. All proposed/intended land uses, temporary or otherwise should be clearly identified in the interests of clarity.

Please refer to the accompanying masterplan drawing prepared by DDA Architects (Drawing No. 19-001-MP-1.103) which presents the zoning objectives for this area super-imposed on to the masterplan to demonstrate consistency with land use zoning objectives. All proposed/intended land uses, temporary or otherwise have been clearly identified in the interests of clarity.

Item No.2 – Having regard to the local road network serving the immediate area and its ability to accommodate additional traffic and/or accesses, the prospective applicant should demonstrate the suitability of the proposed vehicular access arrangements for the subject site and impact on the Colpe and Mill Roads in the absence of the link road from the site to the Marsh Road, and to consider or address any issues in respect of access to adjoining lands, in particular ensuring that the proposed development subject of this SHD pre-application does not unduly prejudice the future development of adjoining zoned lands particularly to the north.

In response to this item of further information requested in the Board's Opinion, the final planning application is accompanied by a Traffic and Transport Assessment (TTA) report prepared by DBFL Consulting Engineers. This report demonstrates that the proposed vehicular access arrangements can function within capacity and that the proposal will not impinge on the operation of the road network in the vicinity, in the absence of the link road from the subject site to Marsh Road.

Having regard to the contents of the traffic and transportation documentation submitted herewith, it is submitted that the proposal will not only avoid prejudicing the development of adjoining lands, it will rather provide an opportunity for the potential future development of such lands, by providing important road infrastructure.

Item No.3 – A site layout plan which clearly illustrates the overall movement and transportation hierarchy for the proposed scheme.

DBFL Drawing No. 170092 – 1053 clearly illustrates the overall movement and transport hierarchy for the proposed scheme in accordance with DMURS.

Item No. 4 - Photomontages and cross sections showing how the development will interface with adjoining lands including the railway line to the west.

The final application is accompanied by detailed cross sections and photomontages to illustrate how the proposal will interface with adjoining lands, including the railway line and the lands on the opposite side of the railway line, which will be linked to the proposed development via the proposed bridge.

Please refer to the DDA drawing pack for the relevant contextual site section drawings, and to the DDA design statements for the photomontages / CGIs illustrating the interface with surrounding lands.

Item No. 5 - Details of existing and proposed levels across the development site relative to adjoining lands.

The final drawing pack prepared by DDA Architects includes site survey plans, which set out the existing site levels relative to adjoining lands. The Site Layout Plans within the architectural drawing pack indicate the proposed site levels relative to adjoining lands.

Item No. 6 - All existing watercourses that traverse the site including any proposal to culvert/re-route existing drains should be clearly identified on a site layout plan.

DBFL drawing nos. 170092-3051, 170092-3052 and 170092-3053 set out this information.

Item No. 7 - Landscaping proposals including an overall landscaping masterplan for the development site and a site layout plan indicating the full extent of tree retention and removal. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments should be submitted.

The application is accompanied by a full suite of landscape architecture and arboricultural documentation prepared by DFLA Landscape Architects and Charles McCorkell Arboricultural Consultancy respectively.

The DFLA landscape drawing pack includes an overall landscape masterplan, while the documentation prepared by the project arborist includes full details of tree retention and removal, including detailed plans and an Arboricultural Report.

The DFLA Landscape Architecture documentation includes details of the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments.

Additional information in relation to the placement and specifications of public lighting within the proposed development may be found within the site lighting drawings and report prepared by Renaissance Engineering.

Item No. 8 - A Building Life Cycle Report in respect of the proposed apartments as per section 6.13 of Sustainable Urban Housing: Design Standards for New Apartments-Guidelines for Planning Authorities (2018).

In response to this item, a Building Life Cycle Report has been prepared by DDA Architects and is submitted herewith. The Life Cycle Report fulfils the requirements of Section 6.13 of the 2018 Apartment Guidelines.

Item No. 9 - A construction and demolition waste management plan.

In response to this item of the Board's Opinion, a full suite of waste management documentation is submitted herewith (including both Construction / Demolition and Operational Waste Management Plans), as prepared by Byrne Environmental Consulting Limited.

Item No. 10 - A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces, surface water management proposals having regard to sub-catchments within the scheme and Part V provision.

In response to this item, a phasing plan has been included within the DDA Architects drawing pack (drawing no. 19-001-P-1.013). The DDA Architectural Design Statement provides a table which breaks down the constituent parts of the development to be delivered within each phase (in accordance with the foregoing item). The John Spain Associates Statement of Consistency and Planning Report also provides further details and rationale in relation to the phasing of the proposed development. The DBFL Infrastructure Design Report includes a phasing drawing setting out which elements of water infrastructure are associated with each phase of development.

Item No. 11 - A site layout plan indicating all areas to be taken in charge.

In response to the foregoing item, a taking in charge layout plan forms part of the architectural drawing pack prepared by DDA Architects. The relevant drawing no. is 19-001-P-1.015.

Item No. 12 - Appropriate assessment screening report and if appropriate a Stage 2 Natura Impact Statement.

The pre-application consultation documentation submitted to An Bord Pleanála in respect of the proposed development included an Appropriate Assessment Screening Report prepared by Openfield.

Following the revisions to the scheme made on foot of the ABP Opinion, a final Screening Report was prepared by Openfield. The AA Screening Report prepared for the final application

concluded that Stage 2 Appropriate Assessment was required. Therefore, a Natura Impact Statement (NIS) has been prepared and is submitted herewith. The current application is accompanied by a Stage 1 AA Screening Report and the Stage 2 Natura Impact Statement.

Item No. 13 - A revised Archaeological Assessment Report to reflect the comments from the Department of Culture, Heritage and the Gaeltacht which addresses, inter alia, the method of preservation of the archaeological sites and their conservation and presentation within the context of the proposed development.

The final Environmental Impact Assessment Report submitted herewith includes a chapter on Archaeology and Cultural Heritage prepared by Archer Heritage Consultants.

The final EIAR chapter responds to the Department's comments and includes details in relation to the preservation of the archaeological sites and their conservation and presentation within the context of the proposed development.

Item No. 14 - Prospective applicant needs to satisfy himself and the Board in the event of making an application that the proposed development is not mandatory for the purposes of Environmental Impact Assessment particularly having regard to any changes in the red-line boundary consequent to the consideration of matters raised in the Opinion. In the event, that the development is considered sub threshold, the information referred to in article 2998(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted.

In response to this specific item of information required by the Board, an Environmental Impact Assessment Report has been prepared and is submitted with this planning application. Following the amendment of the red-line site boundary consequent to the other items of the Board's Opinion (in particular relating to the link street roads infrastructure), the development is of a nature and scale which requires Environmental Impact Assessment. We refer the Board to the accompanying Environmental Impact Assessment Report for further details.

4.0 CONCLUSION

In conclusion, it is respectfully submitted that all the issues raised by An Bord Pleanála have been comprehensively and successfully addressed prior to the submission of this final application to the Board.

The proposed development provides for a significant number of high-quality residential units across a range of sizes and tenures and within a range of building typologies of varying scale and height, with associated childcare facility and open space, in a scheme which effectively responds to the characteristics and constraints of the subject lands with a considered and site-specific design. The development provides for a range of connections to adjacent areas and adjoining permitted and existing development, including a new pedestrian and cycle link across the adjoining railway line.

APPENDIX 1: ANALYSIS OF PHASE 1 ZONED LANDS – DROGHEDA SOUTHERN ENVIRONS

Housing Allocation

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' (i.e. units with extant planning permission that had not yet been implemented) estimated in the county at the time was 10,998. Therefore, an additional 12,942 units remained to be allocated.

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.

Table 2.4 Housing Allocation & Zoned Land Requirements

	Household Allocation 2013-2019	Av. Net Density Applicable unit/ha	Quantity of Residential Zoned Land Required*	Available Land Zoned for Residential Use (Ha)	Available Land Zoned for Mixed Use incl. Residential (Ha)**	Total Available Zoned Land (Ha)	Deficit/ Excess (ha)
Large Growth Town I							
Navan*	3,984	45	88.5	240.5	13.9	254.4	165.9
Drogheda Environs	857	43	19.9	157.2	1.8	159.1	139.1

Table 1. Extract from Table 2.4 of the Core Strategy

Table 2.5 Allocated and Committed Units as per the 2 year Review contained in the CDP Progress Report, Dec 2014²

Urban centre	Committed Unbuilt Units (Nov. 2011)	Committed Unbuilt Units (Dec. 2014)	Household Allocation 2013-2019²
Large Growth Town I			
Navan	786	1,187	3,984
Drogheda Environs	1,653	1,174	857

Table 2. Extract from Table 2.5 of the Core Strategy

Drogheda Southern Environs - Residential Land Evaluation

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.

The sites were identified through a residential land evaluation detailed in Table 6 of Volume 5 of the CDP and included below. The location of these lands is illustrated on the maps in Appendix 2 to Volume 5 (Residential Land Evaluation Maps) and included below as Figure 1. The proposed site is located within Site 7 in the evaluation and constitutes the southern section of Site 7.

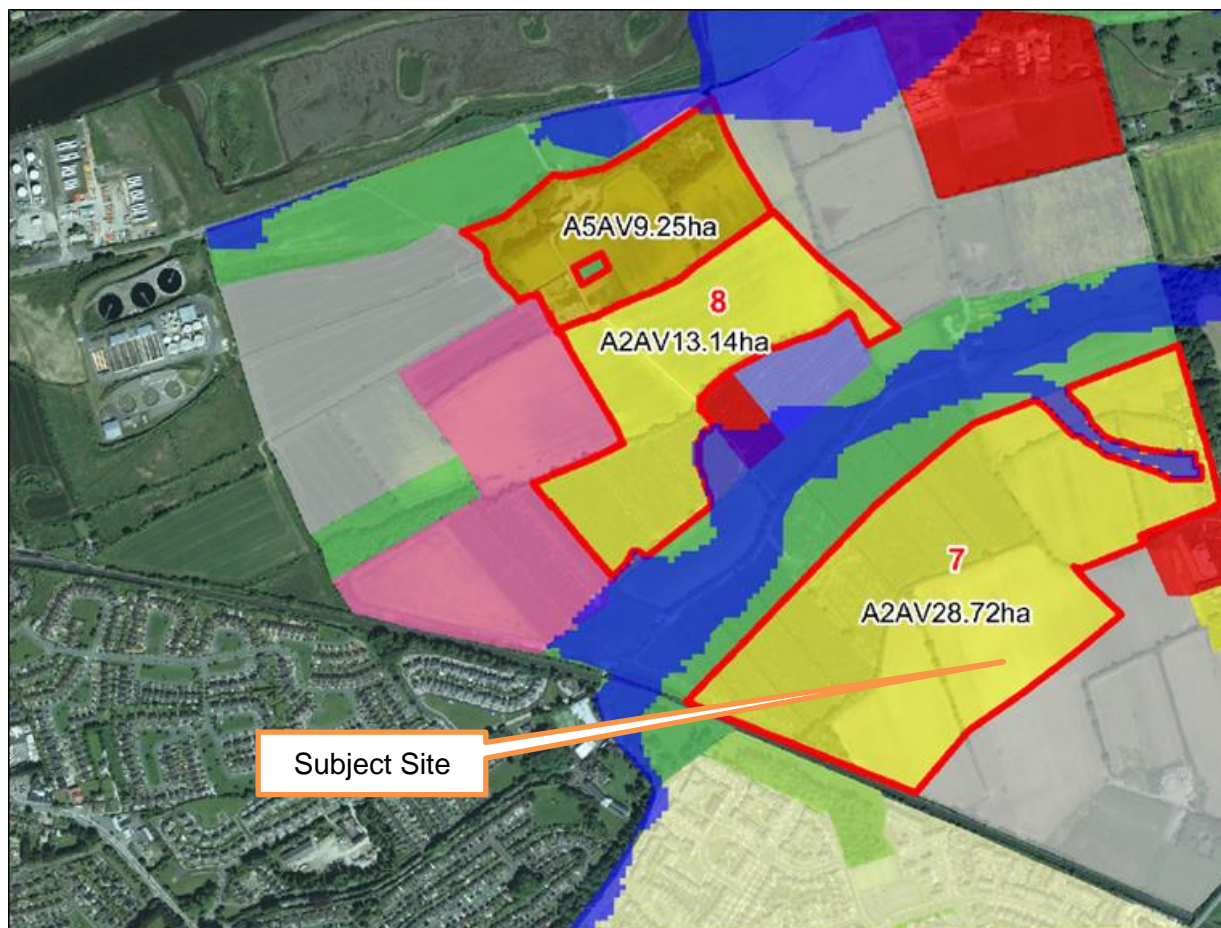


Figure 1. Extract from residential Land Evaluation Map

Table 6: Residential Sites for Evaluation in the Southern Environs of Drogheda

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

Table 3. Extract from Table 6 of Volume 5 of the CDP

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.

Tables 7 and 8 detail the outcome of the residential land evaluation as contained within the CDP (Tables 7 and 8 included below as Table 4 and 5 within this Appendix). 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.

Table 7: Outcome of Residential Land Evaluation

Site	1	2	3	4	5	6	7	8	9
Proximity to Town Centre (West Street) Score	3	3	3	4	3	4	5	4	3
Proximity to Bus Station Score	3	3	3	4	2	4	5	4	3
Proximity to Rail Station Score	4	4	3	3	2	3	3	3	4
Proximity to Primary Education Score	2	3	2	3	1	3	1	1	2
Proximity to Post Primary Education Score	1	3	2	3	1	4	1	1	1
New Roads Required	1	1	2	3	1	4	4	4	1
Infill Site	5	2	5	5	1	2	5	5	5
Natura 2000 Sites	3	3	3	3	1	3	3	5	3
Total Score	22	22	23	28	12	27	27	27	22
Rank	2	2	5	9	1	6	6	6	2

Table 4. Residential Land Evaluation Ranking Matrix

Table 8: Residential Land Phasing

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

Table 5. Residential Land Evaluation Phasing and Site Ranking

Site 7 which includes the proposed SHD site was ranked joint 6th in the residential land evaluation and zoned A2 for residential development, with a Phase II phasing objective (post 2019). We note that Site 3 (which ranked higher than Site 7) is now zoned G1 – ‘*To provide for necessary community, social and educational facilities*’. Therefore the site would not be considered in any updated residential land evaluation.

It is considered that in an updated residential land evaluation, Site 7 would receive an improved score, based on the following factors;

- The residential land evaluation gave Site 7 a score of 4 based on the ‘*need to provide new roads infrastructure to facilitate development*’. The site now benefits from permitted road infrastructure approved by Meath County Council under Reg Ref.: LB 180620 which will provide a link street approximately 640m in length to serve Site 7 (the current SHD proposal includes the footprint of the permitted road, and an alternate layout proposed as part of the SHD development will supersede the permitted layout).
- The site received a score of 5 in relation to the criteria ‘*Infill Site*’ which refers to ‘*Consistency with sequential approach to urban expansion and contribution to a compact urban form. The development of infill sites makes a significant contribution in this regard. Leapfrogging beyond other available sites will not be considered favourably*’. As illustrated in the accompanying masterplan and layout plans, the proposed site is contiguous with the urban form of Drogheda and provides the next phase of development of the Mill Road/Marsh Road lands, building upon the permitted

commercial development to the south and road infrastructure serving the southern section of the overall lands. The proposed development does not *'leapfrog'* other available sites and can be seen as the logical sequential next phase of the development of the Mill Road/Marsh Road lands, as determined by the zoning context, and building upon the permitted commercial development to the south.

- As outlined in the accompanying masterplan and transport linkages plan the Mill Road/Marsh Road lands will be developed with connectivity and accessibility to the town centre and public transport as a priority (including a new bridge across the adjacent rail line to knit the proposed development into the existing urban footprint of the town). The proposed and future links will integrate the lands into the wider urban context, creating a permeable urban quarter which provides accessibility to the town centre and public transport nodes.
- The subject site is also located in close proximity to public transport, with a bus stop at Donacarney Church to the south.

Planning Rationale/ Justification for Bringing Forward the Development of The Subject Phase II Lands)

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 lands.

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

- Lack of development of Phase 1 lands and lack of delivery of targeted growth figures during the lifetime of the current development plan, having regard to the fact that the core strategy of the Development Plan is out of date, and the subject site is intended to be zoned for immediate housing delivery under the forthcoming new Development Plan, as confirmed by MCC during the course of the pre-application process.
- National planning policy including Rebuilding Ireland - Action Plan for Housing and Homelessness, the National Planning Framework, and the Regional Spatial and Economic Strategy for the EMRA.
- The position of Drogheda in the Meath settlement hierarchy.
- The current housing shortage in which residential developments of scale can be considered to be of strategic and national importance.
- The permitted infrastructure serving the proposed site and recent permissions granted in the area, including the recently permitted SHD residential development at Bryanstown (Reg. Ref.: ABP-303799-19) which is located on Phase II lands in Drogheda.
- The schools, employment and retail facilities serving the area including Southgate Centre, Drogheda Grammar School, Le Cheile Educate Together National School and Gaelscoil an Bhradain Feasa (noting the permitted temporary school which is to be provided adjacent to the site also).
- The location and characteristics of the proposed site.

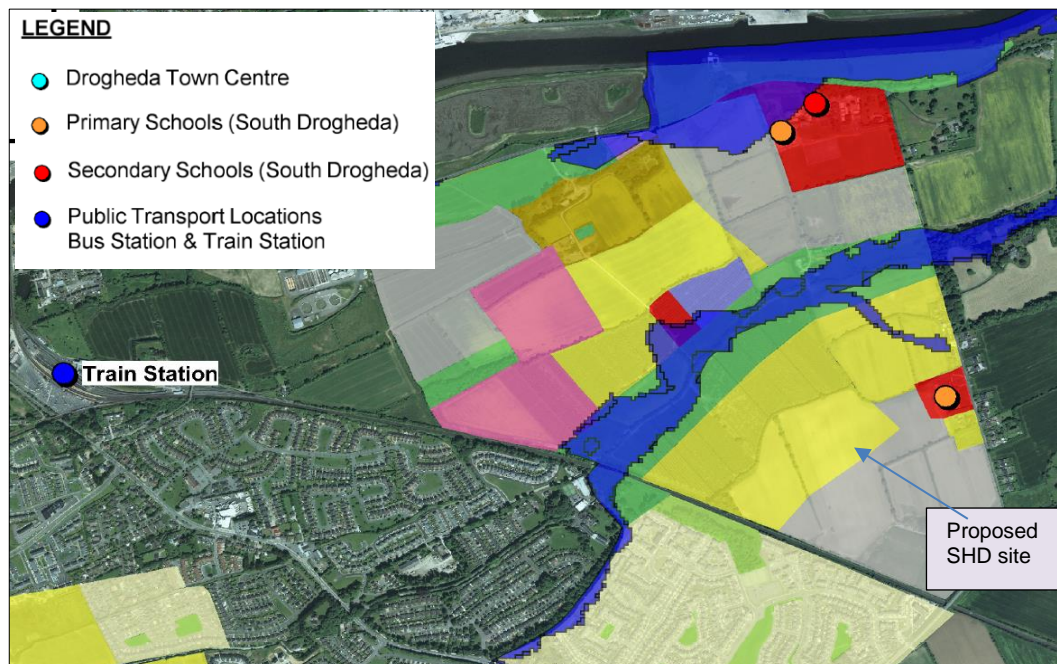


Figure 2. Residential Land Evaluation Map (Points of Interest) – Drogheda Southern Environs

Based on the reasons outlined above and herein it is considered reasonable to assume that the post-2019 phased, A2 zoned lands which are the subject of this proposed strategic housing development will be identified as A2 zoned lands in the new Development Plan. This assumption is supported by the Planning Authority, who have noted during the course of pre-application consultations that it is intended to zone the lands for immediate residential development under the new County Development Plan. We note also that any decision on the future proposed strategic housing development will be made in 2019 onwards with implementation of the development likely to commence in early 2020.

The Planning Authority have confirmed during the course of the pre-application process that the subject site will be zoned for residential development under the forthcoming new development plan.

Phase I Lands Evaluation

Sites 5 and part of sites 1, 2 and 9 were designated Phase I for development during the lifetime of the Meath County Development Plan 2013-2019. The following table summarises the Phase I lands and their delivery performance to date:

The Core Strategy of the Meath County Development plan set out a target for delivery of 857 units, and then evaluated and designated the development sites where these would be delivered. The core strategy figures have not been realised on the identified Phase I zoned lands. A site survey and review of the planning history of the sites reveals that no units have been delivered, and there are not sufficient planning permissions in place for the delivery of these units. The following tables summarises this position.

TABLE 1: DELIVERY ON CORE STRATEGY ALLOCATION	Units
Housing Allocation as per Table 2.5 of the Development Plan	857
Delivered / Committed	
Site 5 - 0 built, 0 committed	0
Site 1 - 235 allocated, 0 built, planning permission in place for 156 (LB170675)	156
Site 2 - 235 allocated, planning permission for 98 (LB 180611) granted, construction started last week, with 0 built to date, creating a shortfall of 137 <i>vis a vis</i> the housing allocation.	98
Site 9 - 235 allocated, 0 built and 0 committed	0
Total committed	254
Shortfall from 857 allocation	603

As set out in Table 1 above, based on a review of units permitted, under construction and completed on lands included in the residential land evaluation (as set out above), the following figures have been compiled for Drogheda Southern Environs for the 2013-2019 Development Plan period (see below for marked up map):

- Units Completed /Commenced / Under Construction – c. 98
- Units Permitted (including units commenced / under construction)– c. 254

The total number of units completed, permitted and currently under construction is therefore 254 units.

Given the allocation of 857 units over the current Development Plan period (including headroom), this constitutes a current shortfall of c. 603 units.

TABLE 2: DELIVERY OF HOUSING CONSIDERED AS COMMITTED DEVELOPMENT IN THE CORES STRATEGY	Units
Extant Permissions / Committed Development as per Table 2.5 Core Strategy	1174
Committed Development Which Has Expired - creating headroom	
SA 60067 413 units permitted at Bryanstown - 0 built	413
SA 60309 - 575 units permitted, approx. 175 in total are now built or have permission in place for approximately 50 more (new permissions in 2018 (LB 180042) and 2019 (LB190071)). 575 committed - 225 (built and committed) creating a net shortfall of 350 units.	350
Shortfall from expired allocated units on 2 sites	763

As per Table 2 above, the County Development Plan core strategy allocation for Drogheda Environs (857 units) was in addition to 'committed development' in the area, which totalled 1,174 units. These committed developments were denoted within the Development Plan zoning maps using red lines around the boundaries of the relevant sites.

It should also be noted that some of the extant permissions (indicated on the Development Plan zoning map by a red outline of the relevant lands) included in the core strategy figures as 'committed development' have expired, including the following:

- Reg. Ref.: SA60309 – 575 residential units at Platin / Duleek Rd. Legavoreen, Drogheda. Approximately 175 of the permitted units in total are now built or have permission in place (new permissions in 2018 (LB 180042) and 2019 (LB190071)). On this basis, the 575 units considered as committed development, minus c. 225 units (built and committed at present) create additional headroom of 350 units.
- Reg. Ref.: SA120136 (extension of Reg. Ref.: SA/60067) – 413 residential units at Bryanstown, none of which were built.

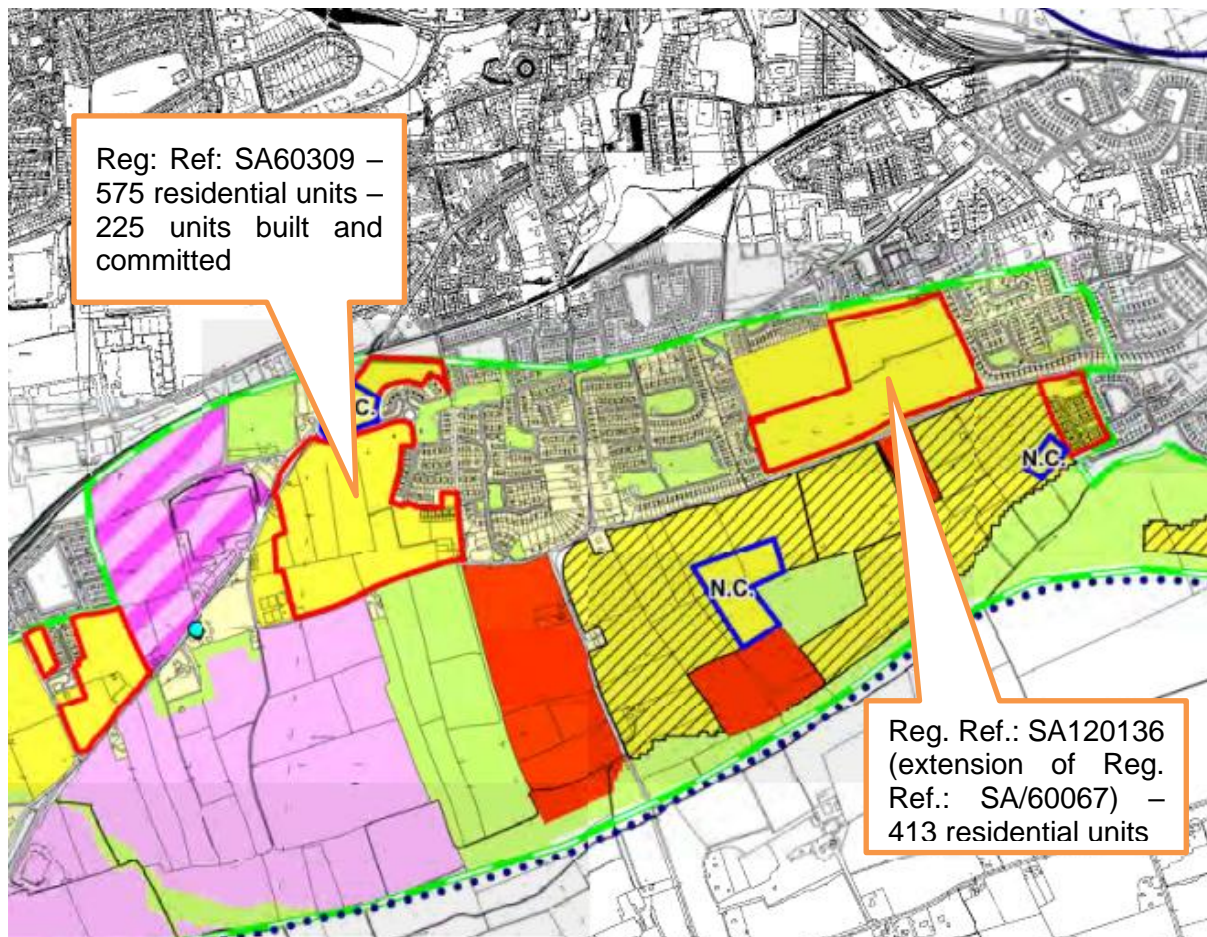


Figure3: Map of unimplemented permissions considered as 'committed development' for the purposes of the Development Plan core strategy calculations

The failure to deliver these units permitted in these 'committed' developments results in a further shortfall in the delivery of the unit allocation within the Development Plan core strategy as detailed in Table 3 below.

TABLE 3: TOTAL SHORTFALL IN HOUSING DELIVERY	Units
Total shortfall due to non-delivery of committed units and allocated core strategy Phase 1 (i.e. sum of total shortfalls from Table 1 and 2).	1366
Phase 2 Lands - Beamore / Bryanstown SHD permitted units	250
Available Units without breaching 2014 Core Strategy figures for South Drogheda	1116

Table 3, above, sets out the total shortfall in housing delivery vis a vis the core strategy total, which is calculated by adding the shortfall in 'committed units' (from Table 1) and the shortfall

in the housing allocation set out in Table 2. The total shortfall in housing units on this basis is 1366 units.

It is considered therefore that the existing Phase I lands (and the lands which were identified as having committed development / extant permissions in place in the Development Plan) have failed to deliver the targets set out in the core strategy. As a consequence of this the town has failed to realise its potential to support sustainable growth over the past development plan period.

As set out in Table 3, we note that permission has recently been granted by An Bord Pleanála for a strategic housing development of 250 units at Bryanstown, Drogheda under Reg. Ref.: ABP-303799-19, on lands which are also subject to a Phase II phasing objective. When this development on Phase 2 lands is taken into account, a deficit of 1116 units remains at present.

The current development proposal provides for 357 units in total.

Therefore, even in the event that the SHD proposal set out herein and the permitted Bryanstown SHD development were developed it would still lead to a total shortfall of c. 759 units under the current 2013-2019 Development Plan allocation (including headroom and taking into account unimplemented / expired 'committed developments' as factored into the core strategy calculations).

As outlined previously, a decision on the future proposed strategic housing development will be made in early 2020 on lands which are zoned for housing delivery after 2019. The housing development will be implemented from early 2020 onwards, in accordance with the post 2019 phasing in the Development Plan.

We would respectfully suggest if permission is granted for the proposed development, the scheme whilst on lands designated as Phase II, will still accord with development plan policy to deliver targeted development within the core strategy numerical allocations for the town.

Therefore, the proposed development can be seen to be justified having regard to the failure of the existing Phase I zoned lands and 'committed developments' to deliver the targets set out in the core strategy, the location of the site adjacent to education, employment and retail land uses, and its suitability for the masterplan-led development of a new neighbourhood in a comprehensive and ordered manner, and the numerous planning gains to be delivered as part of the development proposal.

Conclusion

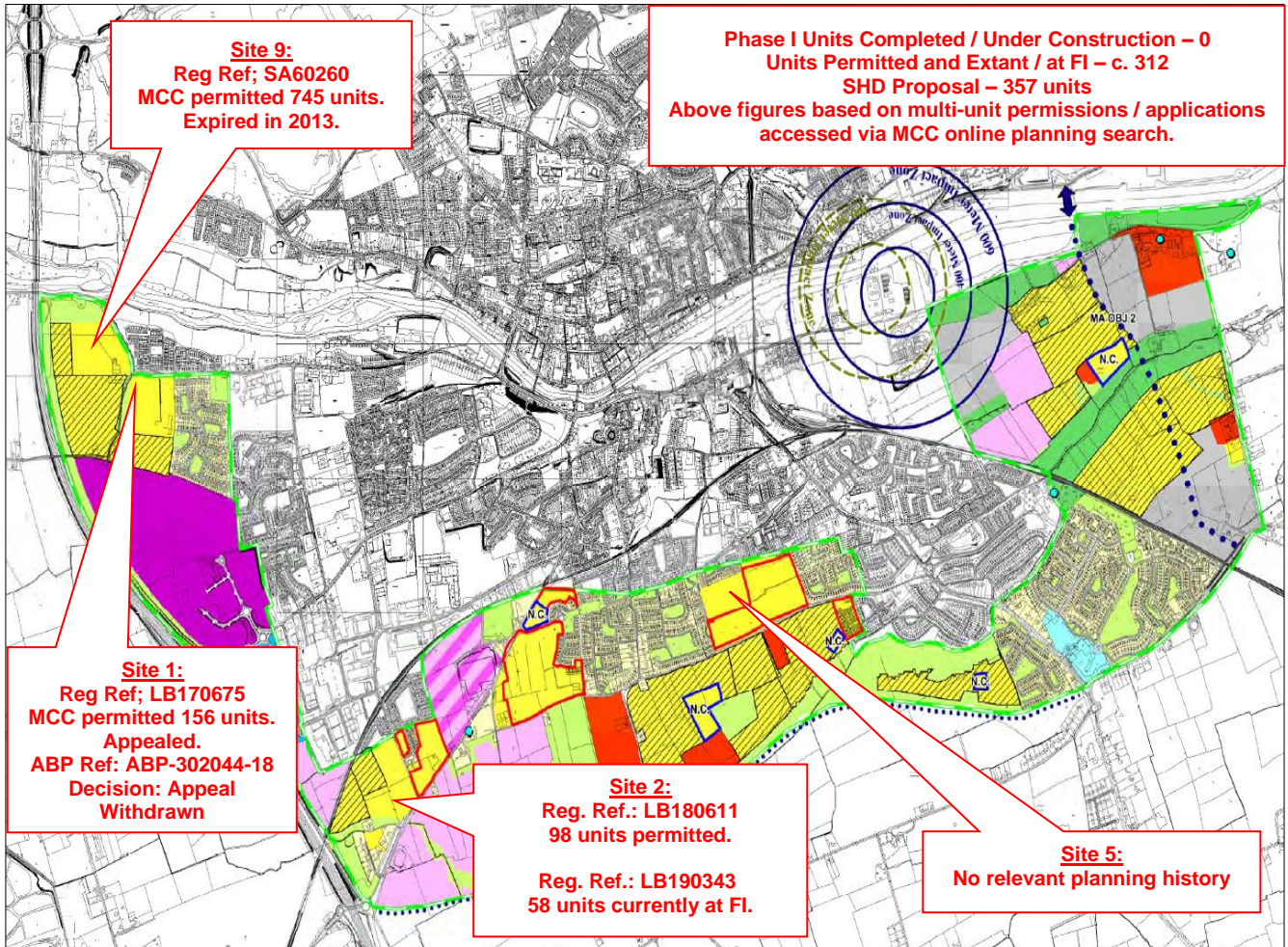
This report has sought to provide an overview of the proposed development and address potential concerns in relation to the timing and phasing of development in Drogheda Southern Environs and aims to provide a planning rationale and justification for the delivery of the proposed strategic housing development on lands which are designated for development post 2019 (i.e. Residential Phase II).

It is considered that the proposed development of residential units in a key regional growth centre on zoned residential lands, contiguous to existing residential developments should be considered despite the phasing barrier to development provided by the Order of Priority Phasing Arrangement for Residential Zoned Lands outlined in the County Development Plan.

As has been set out herein, the proposed development is considered justifiable in this instance given the lack of development of Phase 1 zoned lands and lack of delivery of targeted growth figures outlined in the core strategy, the current housing shortages being experienced in the region, the permitted infrastructure serving the proposed site and the location and characteristics of the proposed site. The suitability of the lands for residential development is already acknowledged through its residential zoning. We note also that any decision on the proposed development will be made post 2019.

The proposed development provides for an orderly and sustainable extension of the town of Drogheda, on appropriately zoned lands which benefit from permitted infrastructure including access and are proximate to social and community infrastructure such as schools (Gaelscoil an Bhradain Feasa), employment and retail (Southgate Centre).

Phase I Residential Zoned Lands in Drogheda Southern Environs - Planning History Review and Map



APPENDIX 2: ANALYSIS OF PHASE I ZONED LANDS – DROGHEDA AND NORTH DROGHEDA ENVIRONS

In relation to North Drogheda Environs, the core strategy phasing map indicates that only 17 units have been delivered (under construction) on only 1 of the 8 identified Phase I sites.

An additional c. 70 units have been delivered on a site that was not taken into consideration during the phasing evaluation exercise.

Please refer to the phasing map and Phase I site analysis below:

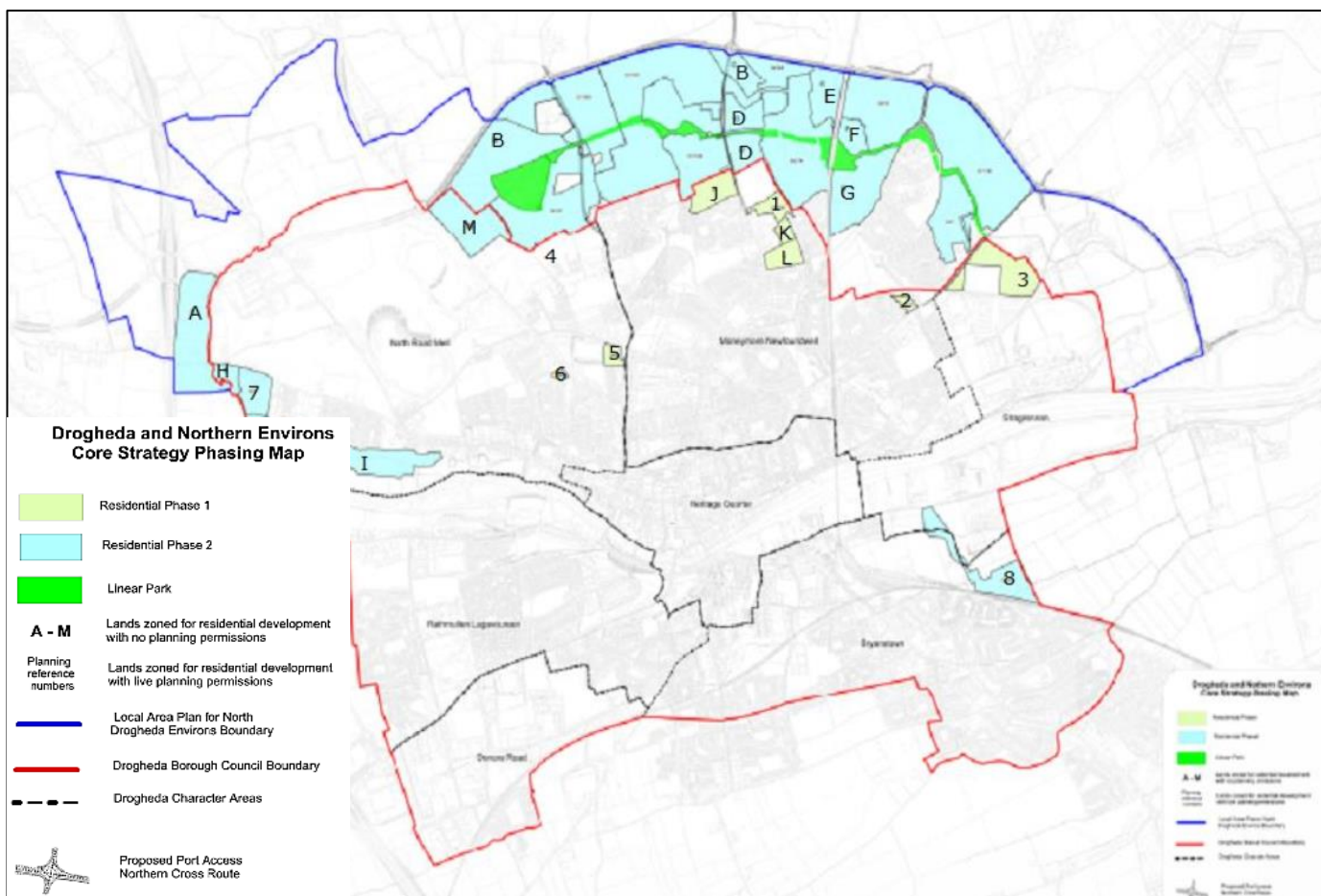


Figure 1: Drogheda and Northern Environs Core Strategy Phasing Map

The core strategy for Drogheda and North Drogheda made provision for an additional 1086 units to 2016. As noted herein, only 17 residential units have been delivered on sites identified as Phase I in Drogheda/North Drogheda Environs since adoption of the Core Strategy in 2011.

A further c. 70 units have been delivered on another site by a single developer – Site 4 on the above map, which was not identified as being Phase I or Phase II despite its extant permission at that time.

Phase I - Drogheda and North Drogheda Environs Core Strategy			
Site	Planning Ref - as per core strategy map	Comment	Units Delivered
4	15/756	117 Units Under Construction	Approx. 70 to date
5	File 08/6	110 Apartments - Expired. New 10 year permission granted under 13/06 for nursing home and medical step down facilities	0
6	File 08/95	49 Units - extended by 14/004 and will expire in November 2019	0
J	No History	Owned by Louth Co Co	0
1	File 08/194	52 units expired and replaced by 15/641 - 5 yr permission for 50 units	0
K	No History	Owned by Louth Co Co	0
L	No History	Owned by Louth Co Co	0
2	10/115	17 Houses under construction nearing completion	17
3	No History	Undeveloped, no history	0
Total Units Delivered on Phase 1 lands since December 2011			87 approx.
Note - Site 4 was not identified as Phase I or Phase II			

Table 1 – Drogheda / North Drogheda Core Strategy Phase 1 Sites analysis

Table 2 shows the relevant performance of Phase II lands in Drogheda located within the Louth County Council administrative boundary.

Phase II - Summary			
Site	Planning Ref - as per core strategy map	Comment	Units Delivered
A	No History	Undeveloped	0
H	81148	permission refused for approx. 300 units and commercial space	0
7	File 06/77	Permission for 190 units, commenced, extended and further extended to end 2021	30 approx.
I	76/531	Permission refused for housing in 1970s. Subject to flooding	0
M	No History	Undeveloped - lack of piped services	0
B	No relevant History	Furniture Factory	0
D	No relevant History	Undeveloped	0
E	No relevant History	Undeveloped	0
F	No relevant History	Undeveloped	0
G	No relevant History	Undeveloped	0
8	File 06/52	Permission granted in 2006 for 260 houses - expired. New permission recently granted by LCC for 130 units with LIHAF funding for access road under 17387	0

Table 2 – Phase II lands – delivery performance

North Drogheda Environs Extant Permissions		
File ref from Core Strategy	Comment	Units Delivered
08/101	527 Units and neighbourhood Centre - recently granted extension of duration	0
07/1869	613 Units granted, recently given EOD	0

07/1399	668 Units granted, recently given EOD	0
07/1507	1056 Units granted, recently amended unit types and given EOD	0
08/368	204 units granted, recently given EOD	0
08/274	599 units granted - EOD currently with LCC 18872	0
File 08/70	437 Units - Expired and now owned by LCC	0
File 07/1791	782 Units recently granted EOD	0
File 08/1	314 Dwelling, recently amended and EOD granted	Approx. 30

Table 3 – Drogheda / North Drogheda Phase 2 Sites Analysis

We note the quantum of extant permissions on Phase II lands in North Drogheda and the lack of delivery of units to date.

We note that Louth County Council granted permission for 130 residential units on Phase II lands south of the River Boyne under Reg Ref.:17/387 (Site 8).

It is noted that Louth County Council has granted extensions of durations to a number of planning permissions that were extant in North Drogheda Environs (summarised at the end of Table 2 above). In order to achieve the extension of duration, all of the applicants had to enact their permissions and carry out 'substantial works'. With the exception of the site of Planning Reference 08/1, it is considered evident from site visits that no work is ongoing on the sites (bar one).

It is considered that a large quantum of extant permissions for residential development in North Drogheda Environs are seriously constrained by phasing and lack of services.

The phasing sequence for each proposed scheme included for approx. 2100 units across the entire north Drogheda environs lands in Phase I distributed across the various permissions. No development can commence in Phase II of any of the individual permissions until various infrastructural requirements are met including the following:

- Construction of the Port Access Northern Cross Route from R132 to R166.
- Construction of a linear park across the three neighbourhoods. Permission was granted for that park in 2008 but this has since expired.
- Trunk Watermains, Trunk Foul Sewers and pumping station, surface water management works.
- Securing sites for School, Regional Sports facilities and community centres.

All of these shared infrastructural requirements were to be provided by way of a development management agreement between Louth County Council and various developers involved with an SPV formed for delivery. Many of the corporate parties to the original agreement with LCC no longer exist and the current delivery mechanism is not implementable.

Conclusion

Current national policy, and regional policy as indicated by the final Eastern and Midlands Regional Assembly RSES, support the growth of Drogheda to City Status. The review of Meath County Development Plan and the preparation of a joint UAP by Meath and Louth County Councils will be required to reflect these higher-level policy objectives.

The core strategies developed by both Louth and Meath County Councils were adopted at a time of deep recession and many sites were constrained as a result. Prevailing market conditions meant that due to the high degree of investment in infrastructure required, many planned schemes were not commercially viable. Many of these constraints still apply, and given the current housing crisis, 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 the RSES growth target is to be achieved.

We note the available precedents with respect to granting of SHD applications on Phase II land where there remains undeveloped Phase I lands, including the proximate and relevant example at Bryanstown in Drogheda.

We would respectfully suggest that given the failure of Phase I lands in Drogheda to deliver in any meaningful way, and the relevant quoted precedent, that there is a planning rationale and justification for the release of the subject lands for development.