

Statement of Response to An Bord Pleanála Opinion

In respect of

Proposed Strategic Housing Development at Bridgegate, Rathgory & Mulladrillen, Ardee, Co. Louth

Prepared for

The Ardee Partnership

Prepared by

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1.0 INTRODUCTION

- 1.1 The pre-application consultation opinion from An Bord Pleanála (ABP) in relation to the proposed strategic housing development for residential development on lands at Bridgegate, Rathgory and Mulladrillen, Drogheda Road, Ardee, Co. Louth was received on 14th December 2020, case reference: ABP-308283-20 (the “Opinion”).
- 1.2 The Opinion states that ABP *‘is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development’*.
- 1.3 An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development:

Settlement Strategy

1. Further consideration of the requirement for a 10-year planning permission. Demonstrate that the proposed development and the remaining phases of extant permission (ABP PL15.238053) on the lands to the north west of the subject site, within the ownership of the applicant, can be delivered in a timely manner.
2. Justification for the proposed development having regard to the core strategy of the Louth County Development Plan.

Open Space

3. Further consideration / amendment of the proposed public open space / public park on the northern portion of the site. Demonstrate that the proposed public open space complies with the zoning objective for the site and that it integrates with the previously permitted open space approved under ABP PL15.238053 to the north west of the site.

Road Infrastructure

4. Further consideration / amendment of the location of the link road as required by Objective INF13, having regard to the development potential of lands to the east of the site, which are zoned as Strategic Reserve and to the zoning objective of the northern portion of the site which seeks to provide a ‘12 acre’ area of open space.

Water Services

5. Further consideration / amendment of the design of the storm water management proposals having regard the existing high potential for flood risk to residential properties downstream of the site. Further consideration of the concerns raised in the report of the planning authority’s Infrastructure Directorate dated 21st October 2020. A site-specific Flood Risk Assessment should be submitted.
6. Further consideration / amendment of the layout of the linear park having regard to Inland Fisheries Ireland: ‘Planning for Watercourses in the Urban Environment: A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning’.

- 1.4 The Opinion further states that, pursuant to article 285(5)(b) of the Planning & Development (Strategic Housing Development) Regulations 2017, the prospective applicant is notified that the following specific information should be submitted with any application for permission:
1. A report that addresses and provides a clear design rationale for the proposed density, design and character of residential units and details of the materials and finishes of the proposed development. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.
 2. A layout plan and report that address and provides a clear rationale for connectivity and permeability within and through the site.
 3. A report that addresses and provides a justification for the proposed housing mix.
 4. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority, and the phased delivery of such public open spaces (in particular in respect of the proposed public open space on the northern portion of the site).
 5. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces and Part V provision.
 6. School Demand and Concentration Report, which identifies demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demands.
 7. Address issues raised in the report of Irish Water to An Bord Pleanála dated 15th October 2020
 8. A material contravention statement, in respect to any and all elements of the development that may materially contravene the Ardee Local Area Plan and the Louth County Development Plan objectives or policies applicable to the site, whether, core strategy, density, connectivity, housing typology, car parking, open space or other.
 9. An Appropriate Assessment Screening Report or a Natura Impact Statement, as may be necessary.
- 1.5 Section 2 of this report sets out how the Applicant has responded to and addressed the requirement of ABP in its Consultation Opinion, with particular reference to the reports and drawings prepared by the design team, which accompany this application.

2.0 SUMMARY OF RESPONSE TO POINTS RAISED

- 2.1 In light of the Board's Opinion noting that the proposals 'require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development', a comprehensive response is provided to the issues which are identified by ABP which need to be addressed.
- 2.2 As noted above, these include a further justification of the proposals as they relate to the duration of permission applied for, settlement strategy, open space, roads and drainage

infrastructure. Amendments have been made to the proposal as now submitted to that reviewed at pre-application consultation stage.

- 2.3 The proposal as submitted has taken cognisance of the Opinion of both An Bord Pleanála and Louth County Council following Pre-Application Consultation and are considered to sufficiently respond to the items of issue which ABP identified and have sought to refine and improve the proposals.
- 2.4 In addition to this, responses are provided to each of the items of specific information which An Bord Pleanála require to be submitted with the planning application. Each of these items are addressed in turn below.

Issues to Address

Settlement Strategy

- 1. Further consideration of the requirement for a 10-year planning permission. Demonstrate that the proposed development and the remaining phases of extant permission (ABP PL15.238053) on the lands to the north west of the subject site, within the ownership of the applicant, can be delivered in a timely manner.**

- *Please refer to Statement of Consistency & Planning Report prepared by John Spain Associates*

- 2.5 Following pre-application with Louth County Council and An Bord Pleanála, the applicant now seeks a 7-year planning permission for the proposed development.
- 2.6 The applicant is currently on site at Phases 1-3 of Bridgegate (Reg. Ref.: 10174; ABP Ref: PL15.238053), with Phase 1 complete and works started on Phase 2. The permission was extended under Reg. Ref.: 21135 and expires on 4th March 2027 however, works are anticipated to be completed well in advance of this date. Planning permission Reg. Ref.: 19336 and Reg. Ref.: 19353 for Phase 2 and 3 of the development was extended by LCC to 31st December 2025, with works currently undergoing. The proposed indicative completion rates for the permitted development northwest of the subject site are shown below, as provided by The Ardee Partnership.

Phase 1 – 3 (Permitted)	Completion Year
Phase 2	Q1 2022 – mid 2023
Phase 3	Mid 2023 to mid-2025

- 2.7 As noted, Phase 1 is now complete, and Phase 2 is now under construction. Phase 3 is anticipated to begin mid-2023. These are indicative build-out rates and the construction programmes have been developed following understanding of the previous stages and the sales velocity experienced at the location.
- 2.8 The applicant is committed to the build out the overall development within 7 years of a grant of planning permission of the application now submitted at Phase 4. The phased implementation of the development is considered to be acceptable to the Planning Authority as set out in their Pre-Application Opinion dated October 2020. The proposed development will be constructed across 6 phases, shown in the extract of submitted Darmody Architecture (DA) Drawing PA-003 in the context of the wider development at Bridgegate.

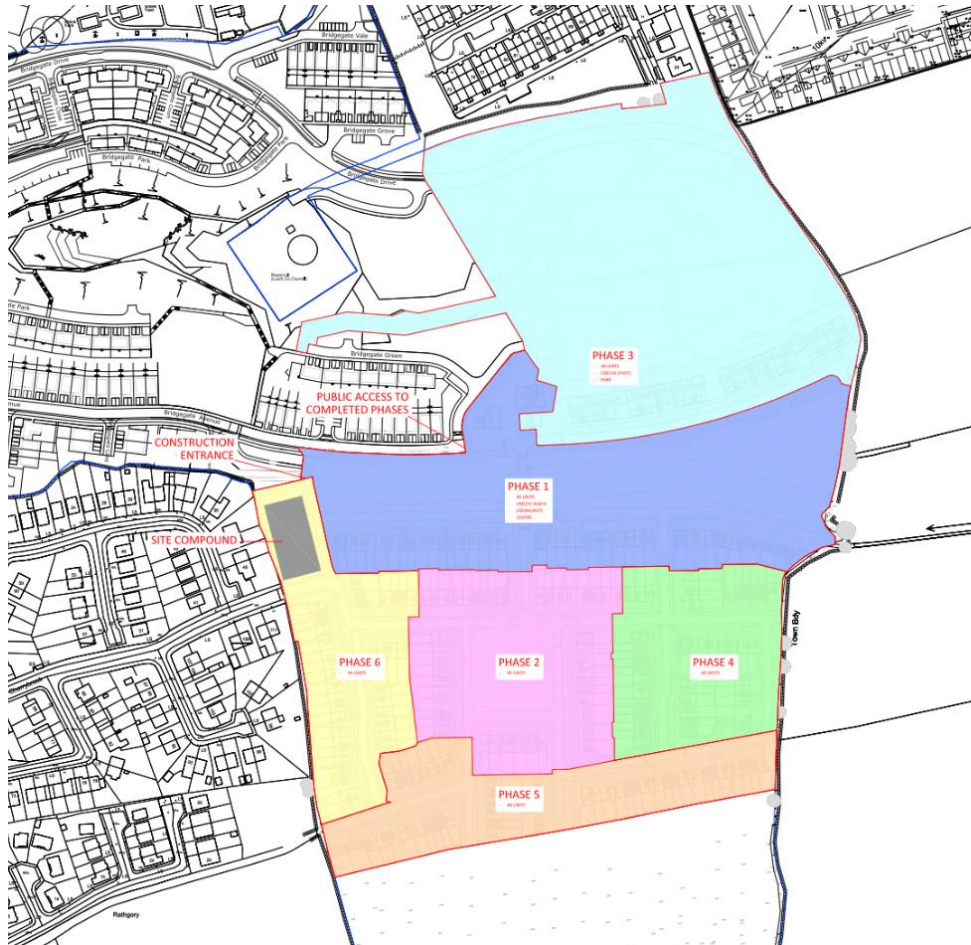


Figure 2.1: Extract of Phasing Plan (DA Drawing no. PA-003)

- 2.9 The proposed phasing of development is set out at Section 3.8 of the accompanying JSA Statement of Consistency and Planning Report. The indicative construction programme for the proposed development is set out in the table below.

Phase 4 Lands (Proposed)	Completion Year
Phase 1 (40 units, Part Creche & Community Centre)	Q1 2023 – mid 2024
Phase 2 (45 units)	2024
Phase 3 (48 units, park creche and park)	Mid 2024 – 2025
Phase 4 (49 units)	2025 – mid 2026
Phase 5 (46 units)	Mid 2026 – 2027
Phase 6 (44 units)	Mid 2027 – 2029

- 2.10 Notwithstanding the proposal for a 7-year permission for the proposed development, the applicant seeks to complete the build-out of the scheme in advance of the expiry of any such permission and prior to the beginning of 2029. However, the applicant seeks a 7-year permission on the basis the current challenges facing the construction industry arising primarily from the repercussions from the Covid-19 pandemic which has caused delays in completion of units at Phase 1-3 of the Bridgegate development. Lead in times and material and labour costs have also increased. The proposed development is reliant

on elements of roads and drainage infrastructure to be implemented in order to progress Phase 4 of the scheme and is therefore influenced by the timely completion of the initial phases to build-out the proposed development.

- 2.11 In review of the current market conditions, Turner & Townsend (T&T) noted in the core findings of their 'Republic of Ireland Market Intelligence Survey' Autumn 2021 report¹ that *'construction duration has been adversely affected by COVID-19 and 37.5% of surveyed contractors reported that their projects had increased in duration by 5 or more weeks because of COVID issues and restrictions'*.
- 2.12 The report found that *'COVID-19 continues to have a detrimental effect on the Irish construction industry, and it is likely to be late 2021 or early 2022 before it starts to recover more fully' with 'a full restoration of productivity levels within the next twelve months'*. This has also impacted on lead in times, *which 'have dramatically increased within the past six months' and 'logistics and planning around the delivery of key materials have now become more important than ever'*. T&T note that material costs have increased by 13.4% in the 12 months to July 2021 and labour costs by 4% in the same period. Overall tender price inflation is observed at +8.9% in 2021.
- 2.13 The applicant has undertaken a cost analysis of subcontractor packages in from May 2020 to September 2021 on a scheme they are currently building out in County Dublin. This analysis notes increased costs of between 9% and 57% for mechanical services and slabbing respectively, with labour costs increasing by 15-20% as a result of industry labour shortages. Market research by SISK, as set out in the 'Buildcost Construction Cost Guide – 2nd Half 2021'², shows the extend of material price increase in the period end 2019 to June 2021, is shown in the table below.

Material	Price Incr.
Steel Coil	82%
Copper	62%
Plywood	55%
Softwood Timber	47%
Steel	47%
Insulation	43%
Reinforcement bar & Mesh	40%
Metal stud	26%
Bricks	16%
Plasterboard	14%

- 2.14 The increase in material costs has been attributed to multiple macroeconomic reasons including:
- Increase in international shipping costs – particularly from China
 - Restrictions to international transport channels
 - Supply / transport delays associated with Brexit

¹ <https://www.turnerandtownsend.com/media/5736/roimi-autumn-2021-final.pdf>

² <https://buildcost.ie/Buildcost-Construction-Cost-Guide-2nd-Half-2020.pdf>

- Closure / furlough of factories resulting in supply backlog
- Other countries leaving lockdown earlier are accessing available stocks sooner
- Severe weather in Southern US States in Q4 2020 affecting oil supplies
- Incoming materials pre-sold leading to selected allocation of stock

2.15 The T&T notes the following top 5 key challenges facing the Irish construction industry as follows:

- Rising costs of construction
- Skilled labour shortages
- Excessive lead times
- Too many contractors chasing too few projects
- Government red tape, bureaucracy, delayed approvals

2.16 It therefore clear that there are numerous issues which continue to face the construction industry in Ireland at present, with it difficult to anticipate how these may be resolved in the coming months and years. Indeed, there exists continued uncertainty in respect of Covid-19, with further restrictions a realistic possibility during winter 2021/22 which would undoubtedly impact upon construction rates further and exacerbate delays in project completions as well as implications for supply of materials due to any halt in manufacturing and production.

2.17 It is reiterated that the applicant is committed to building out Phase 1-3 (Reg. Ref.: 10174; ABP Ref: PL15.238053 of Bridgegate in accordance with the indicative construction programme set out above and well in advance of the 2027 expiry date of the permission. It is also considered that the applicant is committed to completing construction of the proposed development, forming Phase 4 of Bridgegate, before 2029. Notwithstanding this, there remains uncertainty and challenges to the construction industry in Ireland which may be reasonably considered to contribute to delays in construction in the coming years. In this regard, the applicant seeks a 7-year permission which is considered to be appropriate and proportionate to ensure the implementation of the overall development in a timely manner whilst allowing for any unforeseen circumstances which may rise in light of current market conditions and continued uncertainty in the construction industry and generally.

2. Justification for the proposed development having regard to the core strategy of the Louth County Development Plan.

- *Please refer to Statement of Consistency prepared by John Spain Associates*

2.18 The proposed development is considered to be consistent with the Core Strategy of the Louth County Development Plan 2021-2027 as set out in Table 2.17 of the CDP, extract below.

Table 2.17: Core Strategy Table

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M
Settlement Category	Settlement	Population 2016	Projected Population Increase to 2027	Projected Population 2027	Total Projected Housing Stock 2027	Total Additional Housing Units 2016-2027	Approx. Units Completed 2016-2020	Housing Allocation 2021-2027	Lands with potential to deliver Infill or Brownfield Development (ha)	Potential units to be delivered on Infill/Brownfield Lands	Total Lands Zoned New Residential Phase 1 (ha)	Total lands zoned New Residential (Phase 1 and Phase 2) (ha)
County	Louth	128,884	21,082	149,966	61,717	10,318	2,040	8,278	110.4	4,302	506.1	597.1
Regional Growth Centre	Drogheda	34,199	6,914	41,113	17,184	3,443	400	3,043	34.8	1,725	270	270
	Dundalk	39,004	7,660	46,664	19,892	3,541	935	2,606	30	1,743	150.3	225.7
Self-Sustaining Growth Towns	Ardee	4,928	1,655	6,583	2,751	749	165	584	8.5	298	35.9	51.5
	Dunleer	1,822	935	2,757	1,144	425	80	345	3.1	109	8.4	8.4

- 2.19 Ardee is noted as a 'Self-Sustaining Growth Town' within the Core Strategy of the CDP, with Table 2.17 setting on a projected population increase of 1,655 in the Plan period to 2027, with a housing allocation of 584 in the same period. The subject site is zoned 'A2 New Residential Phase 1' lands in the Ardee land use zoning map and forms part of the total lands set out in Column L of Table 2.17. In this respect, the proposed development will contribute 272 dwellings to the housing allocation in the Plan period to 2027 and is therefore consistent with the Core Strategy of the County Development Plan 2021-2027.

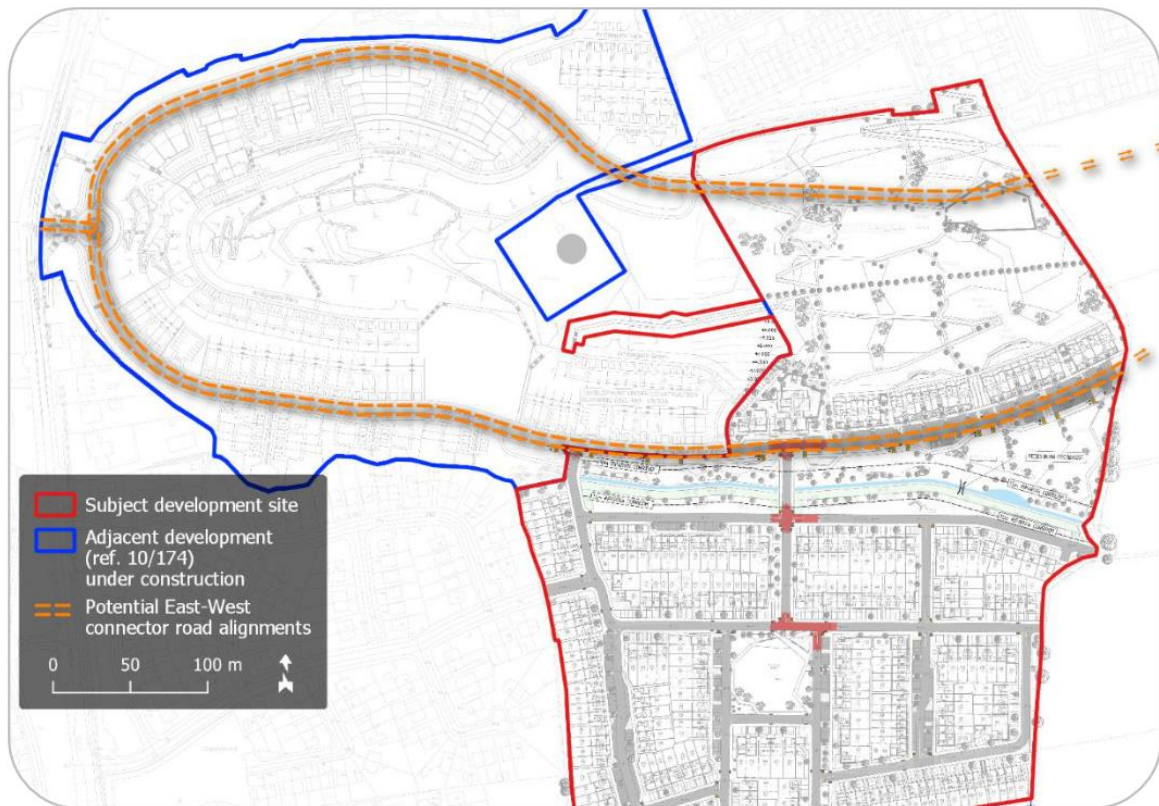
Open Space

3. **Further consideration / amendment of the proposed public open space / public park on the northern portion of the site. Demonstrate that the proposed public open space complies with the zoning objective for the site and that it integrates with the previously permitted open space approved under ABP PL15.238053 to the north west of the site.**
- *Please refer to Landscape Drawings & Landscape Design Report prepared by Stephen Diamond Associates*
 - *Please refer to architectural drawings and Design Statement prepared by Darmody Architecture*
- 2.20 The proposed public park at Mulladrillen Hill has been amended following pre-application consultation with Louth County Council and An Bord Pleanála. Changes to the park include:
- Enlarged area to c. 3.62 ha (c. 3.47 ha previously)
 - Public Park of c. 6.95 ha excluding road reserve area
 - Total public park area of c. 7.2 ha (taken together with that permitted at Phase 1-3), significantly in excess of the 4.9 ha requirement set out at Spot Objective 4 of the Louth CDP 2021-2027
 - New permeable pedestrian link to permitted park to the west to the north of Bridgegate Green, connecting to internal footpath layout the western perimeter
 - New permeable pedestrian and cycle link to permitted internal footpath layout at Bridgegate Drive at the northwest perimeter
 - New permeable pedestrian and cycle link to northern site perimeter at Hale Street
 - Repositioned nature-based play area and amended landscaping planting scheme to facilitate indicative road reserve through the northern part of the open space

- 2.21 The proposed layout of the proposed public park will facilitate the implementation of a high-quality landscaped area which will fully integrate with the permitted park to the west, as well as providing a footpath to the northern perimeter of the site at Hale Street, facilitating links to local schools and Ardee town centre.
- 2.22 It is noted that the Louth County Development Plan 2021-2027 includes Spot Objective 4 'to provide a public park with a minimum area of 12 acres (4.9 hectares) as part of a residential development' at the site. The proposed development is in compliance with this objective.

Road Infrastructure

- 4. Further consideration / amendment of the location of the link road as required by Objective INF13, having regard to the development potential of lands to the east of the site, which are zoned as Strategic Reserve and to the zoning objective of the northern portion of the site which seeks to provide a '12 acre' area of open space.**
- *Please refer to Landscape Drawings & Landscape Design Report prepared by Stephen Diamond Associates*
 - *Please refer to Engineering Drawings (Proposed Site Layout, Road Layout, Visibility Splays & Permeability) and Section 3.7 of the Traffic & Transport Assessment prepared by CS Consulting*
 - *Please refer to Road Infrastructure Design Report prepared by CS Consulting*
- 2.23 It is noted that the Louth County Development Plan 2021-2027 came into effect on 11th November 2021 and superseded the Ardee LAP 2010-2016 which included Infrastructure Objective INF 13.
- 2.24 It is noted however that the Louth CDP 2021-2027 includes a similar objective under Policy SS 42 which seeks to 'facilitate the provision of a new link road from Rathgory and Mulladrillen to Black Road' through the application site. The proposed development is in compliance with this policy as it includes an extension of Bridgegate Avenue to meet the eastern perimeter and has therefore been designed to facilitate the provision of this road on the subject lands. An indicative road reserve route through the public park in the northern part of the site is also provided. It is noted that the lands adjoining to the east are outside the ownership of the applicant and zoned 'L1 Strategic Reserve'.
- 2.25 Therefore, the proposed development is demonstrated to facilitate a future link between Rathgory & Mulladrillen and Black Road. The potential routes are shown below in Figure 2.2.

Figure 2.2: Potential Connections to Lands to the East

Source: CS Consulting Engineers

- 2.26 The proposed extension of Bridgegate Avenue to the eastern boundary has been designed to form future connector road and in accordance with DMURS and is considered to represent the most appropriate and efficient route through the lands. A potential indicative road route has also been illustrated through the northernmost section of the public park area. Please refer to SDA drawing no. 20-547-SDA-PD-DR-001 for details.
- 2.27 It is noted that the applicant is not in ownership of the agricultural lands outside the red line boundary to the east. The routes shown through these lands are purely indicative and dependent on third party agreement. They do not form part of this application.
- 2.28 The proposed development proposes an extension of Bridgegate Avenue to the eastern boundary south of the public park with cycle lanes is considered the most suitable and efficient route through the subject site. This is considered to be in compliance with Objective SS 42 of the Louth CDP 2021-2027. Please refer to the accompanying CS Consulting Traffic & Transport Assessment and Road Infrastructure Design Report for further details.
- 2.29 The extant Louth CDP 2021-2027 includes Spot Objective 4 which requires *'to provide a public park with a minimum area of 12 acres (4.9 hectares) as part of a residential development'* at the 'A2 New Residential Phase 1' lands at Rathgory and Mulladrillen. Taken in combination with the c. 3.72 ha area of public park permitted under permission Reg. Ref.: 10174; ABP Ref: PL15.238053 at Phase 1-3 at Bridgegate, a total area of c. 7.2 ha will be provided at the location subject to a grant of permission for the proposed development. As set out in the accompanying Darmody Architecture Schedule, the total

area of the public park excluding the indicative route through the northern part of site would be c. 6.95 ha. This is significantly in excess of the 4.9 ha requirement of the development plan and will implement significant planning gain to the development and the wider community of Ardee.

Water Services

5. Further consideration / amendment of the design of the storm water management proposals having regard the existing high potential for flood risk to residential properties downstream of the site. Further consideration of the concerns raised in the report of the planning authority's Infrastructure Directorate dated 21st October 2020. A site-specific Flood Risk Assessment should be submitted.

6. Further consideration / amendment of the layout of the linear park having regard to Inland Fisheries Ireland: 'Planning for Watercourses in the Urban Environment: A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning'.

- *Please refer to Site Specific Flood Risk Assessment prepared by JBA Consulting*
- *Please refer to Engineering Services Report & Drawings prepared by CS Consulting*
- *Please refer to Construction Environmental Management Plan prepared by Altemar*

2.30 Following receipt of the Planning Authority and An Bord Pleanála Opinion, the design team has had ongoing consultation with Louth County Council Planning and Infrastructure teams in preparation of the planning application, with 2 no. meetings taking place in February and April 2021 respectively and additional ongoing correspondence following these meetings.

2.31 Please refer to Section 6.1 and Section 6.2 of the CS Consulting Engineering Services Report for responses to the relevant items of the ABP Opinion and the Planning Authority's Infrastructure Directorate dated 21st October 2020 respectively.

2.32 The Engineering Services Report notes that *'the drainage strategy at the subject site contributes to an improved situation at the [Rathgory Tributary] watercourse in terms of reduction to peak flow in reaching the channel'*.

2.33 The accompanying SSFRA provides a comprehensive assessment of the proposed development and its potential impact on flood risk in the area.

2.34 The SSFRA notes that *'the work undertaken in the SSFRA and by the CS Consulting stormwater design has demonstrated that there is no additional surface water runoff from the development, the peak flow downstream is reduced and that the design appropriately manages flood risk from all sources'*. The assessment notes that *'there are no instances of historic flooding on site'*. A minority of the site at the eastern perimeter is located in Flood Zone A & B, with historic flood events recorded in the surrounding area, proposing mitigation measures in this respect:

- Location of all buildings in Flood Zone C, with Flood Zone A & B maintained as open space and riparian corridor provided
- Setting floor levels to the 1% AEP climate change water level plus a freeboard allowance of at least 1.25 metres
- Setting finished floor levels to a minimum of 150mm above surrounding ground levels to provide protection against pluvial flooding
- Design of stormwater system to manage surface water to retain a 1 in 100-year flood event with 20% allowance for climate
- Limit any outflow from the site to existing Greenfield Runoff Rate

2.35 The SSFRA concludes that:

'As a result of the mitigation details discussed above, it is concluded that the development proposal is in compliance with the core principles of the Planning System and Flood Risk Management Guidelines and has been subject to a commensurate assessment of risk.'

2.36 It is confirmed that proposed layout of the linear park and riparian corridor has had regard to *'to Inland Fisheries Ireland: 'Planning for Watercourses in the Urban Environment: A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning'*. The SSFRA confirms that *'the OPW has been consulted through the design process to agree the channel design requirements'*. This is detailed and explained in the accompanying SSFRA, Engineering Services Report, Construction & Environmental Management Plan (prepared by Altemar).

Specific Information

1. A report that addresses and provides a clear design rationale for the proposed density, design and character of residential units and details of the materials and finishes of the proposed development. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.

- *Please refer to the Statement of Consistency & Planning Report prepared by John Spain Associates*
- *Please refer to the Statement of Material Contravention prepared by John Spain Associates*
- *Please refer to the Architecture Design Statement prepared by Darmody Architecture*

2.37 The accompanying Design Statement prepared by Darmody Architecture sets out a comprehensive rationale for the design and character of residential units, with particular regard to the high quality and sustainable finishes of the development.

2. A layout plan and report that address and provides a clear rationale for connectivity and permeability within and through the site.

- *Please refer to Darmody Architecture Site Layout Drawing No. PA-002*
- *Please refer to Stephen Diamond Associates Landscape Plan*
- *Please refer to Road Infrastructure Design Report & DMURS Statement prepared by CS Consulting*

- *Please refer to Statement of Consistency & Planning Report prepared by John Spain Associates*

- 2.38 The accompanying Proposed Site Layout Plan prepared by Darmody Architecture and the SDA Landscape Plan notes all proposed permeable links through the site. This is complemented by the Road Infrastructure Design Report and DMURS Statement prepared by CS Consulting.
- 2.39 The proposed development includes a range of vehicular, pedestrian and cycle links to adjoining lands and the permitted development to the west at Phases 1-3 of Bridgegate. The internal road layout has been designed in compliance with the principles of DMURS, introducing a hierarchy of streets and seeks to promote pedestrian and cyclist movement throughout the site. Cycle lanes are provided to the south of Bridgegate Avenue and benefit from being routed through the public open space at this location, enhancing safety and providing an attractive route for users. Bridgegate Avenue is extended to meet the eastern perimeter, facilitating potential future connections to the strategic land reserve adjoining to the east. The public park at Mulladrillen Hill provide 2 no. pedestrian links to the permitted Bridgegate development to the west, with a pedestrian footpath provided to meet the northern perimeter of the site at Hale Street. This ensures the proposal will integrate fully with permitted and existing residential development adjacent, facilitating safe permeable links to local schools and Ardee town centre to the north.
- 2.40 A network of pedestrian routes is included throughout the site and the public open spaces at the linear park adjacent to the Rathgory Tributary, with a central landscaped spine linking this area with the pocket park located centrally in the southern part of the scheme. Three neighbourhood streets characterise the development south of the watercourse on the north-south axis, providing shared surfaces which ensure low vehicular speeds and pedestrian safety.
- 2.41 The layout in the southern section of the site seeks to provide for possible future connections to adjoining lands. A road link is provided up to the western perimeter to facilitate a potential future link to the residential development at Cherrybrook. It is understood that Louth County Council are currently considering an application to take this development in charge. Any connection would be subject to landowner agreement. A further potential future connection can be facilitated at the southwest corner of the site which has the potential to provide a future pedestrian / cycle link to the N2 Drogheda Road. The road network is extended to the eastern and southern perimeters to enable potential future links to adjacent lands.

3. A report that addresses and provides a justification for the proposed housing mix.

- *Please refer to Future Analytics Socio Economic & Housing Supply Assessment*

- 2.42 The enclosed assessment has been prepared to ascertain the current housing demand in Ardee to inform the proposed mix at the development at Phase 4, Bridgegate. This involved a focused survey of local Estate Agents serving Ardee, the findings of which *'support the conclusion that housing supply in Ardee is currently outstripped by demand'*. The Royal Society of Chartered Surveyors Ireland Annual Residential Property Review and Outlook 2021 Report states that *'Covid 19 has exacerbated the gap between new supply and demand'*, which highlights the requirement for housing in the settlement.

- 2.43 In terms of type of housing demand, semi-detached units are noted to be *'in greatest demand in the area'*, with secondary demand for townhouses and detached housing. Estate Agents surveyed *'indicated that the highest level of demand in Ardee is for three bedroom dwellings'*. This research has informed the proposed mix of dwellings.
- 2.44 In conclusion, the assessment notes that the proposed development mix *'would make a positive significant contribution to housing supply in Ardee, with a realistic proposition for delivery that is not otherwise being met on lands identified as Phase 1 or Phase 2 [residential zoned lands]'*. Furthermore, Future Analytics consider that *'the subject site represents one of the most sustainable sites for residential development in Ardee located on lands at the edge of the existing settlement area and close to surrounding amenities and is consistent with land use zoning and policy under the County Development Plan'*.
- 2.45 The report notes that the proposed development provides a *'strong balance and mix of units'* and supports the Louth Housing Strategy aims of:
- *To identify the existing need and likely future demand for housing in the area of the County Louth Development Plan.*
 - *To ensure Louth County Council provides for the development of sufficient housing to meet projected future demand over the lifetime of the County Development Plan.*
 - *To ensure that sufficient zoned lands are provided to meet the needs of different households of all types and tenures.*
- 2.46 The Planning Authority's Pre-Application Opinion notes that the proposed housing mix reviewed at pre-application stage, broadly similar to the submitted proposal, is *'considered appropriate and acceptable'*.
- 4. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority, and the phased delivery of such public open spaces (in particular in respect of the proposed public open space on the northern portion of the site).**
- *Please refer to Darmody Architecture Taking in Charge Drawing No. PA-007*
- 2.47 The planning applications includes a Taking in Charge drawing prepared by Darmody Architecture. This proposes the taking in charge of the internal road and footpath network, as well as the public park at Mulladrillen Hill. It is proposed that these areas be taken in charge by Louth County Council and have been designed to a standard acceptable to the local authority.
- 5. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces and Part V provision.**
- *Please refer to Darmody Architecture Phasing Plan No. PA-003*
 - *Please refer to Statement of Consistency prepared by John Spain Associates*
 - *Please refer to Part V Letter (including Louth County Council letter)*
- 2.48 The applicant proposes to deliver the development in 6 no. phases. This is illustrated in the accompanying Phasing Plan (PA-003) prepared by Darmody Architecture.
- 2.49 Phase 1 will consist of the part of the crèche and community building, associated parking and infrastructure in the northern part of the site on Bridgegate Avenue, as well as the

- central spine branching to the south which provides a connection to the southern part of the site via the watercourse crossing. Dwellings extending across the southern boundary of the open space is included. This will include 40 no. dwellings, parking, landscaping, open space at POS1 and POS2, including pedestrian watercourse crossing, part of the crèche and community building and associated infrastructure. A total of 4 no. Part V units will be delivered in this phase.
- 2.50 Phase 2 will comprise public open space POS3, including 45 no. dwellings, parking, landscaping, access and associated infrastructure at the central part of the site. A total of 6 no. Part V units will be delivered in this phase.
- 2.51 Phase 3 will comprise the balance of the crèche (with cumulative demand arising in later phases to ensure the viability of the creche when operational), Bridgegate Avenue extending east and the Public Park and communal open space to the north of the duplex blocks, including 48 no. dwellings, parking, landscaping, access, part crèche and public park and associated infrastructure. A total of 4 no. Part V units will be delivered in this phase.
- 2.52 Phase 4 will comprise the eastern part of the proposed development including 49 no. dwellings, parking, landscaping, access and associated infrastructure. A total of 10 no. Part V units will be delivered in this phase.
- 2.53 Phase 5 will comprise 46 no. dwellings, parking, landscaping, access and associated infrastructure at the southern perimeter of the site. A total of 2 no. Part V units will be delivered in this phase.
- 2.54 Phase 6 will comprise the balance of 44 no. units at Bridgegate Way at the western part of the site, including parking, landscaping, access and associated infrastructure. A total of 2 no. Part V units will be delivered in this phase.
- 2.55 The 28 no. Part V units are distributed throughout the site and will be built out in accordance with each phase. Public open space and the community facilities will be constructed in development Phase 1, 2 and 3.
- 2.56 The proposed phasing plan was noted to be acceptable to the Planning Authority as set out in their Pre-Application Opinion issued in October 2020 and a letter confirming agreement in principle was issued by LCC in October 2021 and accompanies this submission.
- 6. School Demand and Concentration Report, which identifies demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.**
- *Please refer to School Demand and Concentration Report prepared by John Spain Associates*
- 2.57 The assessment of existing and future schools' capacity in Ardee has been undertaken as part of this application in response to item 6. The assessment notes the presence of 3 no. primary schools and a single secondary school in Ardee.
- 2.58 There is currently capacity for 35 primary school aged children in Ardee, with a potential demand of c. 90 places arising from the proposed development based on a household

size of 2.75. However, the Ardee Educate Together National School is due to begin works on a school in Q1 2022 to provide a potential maximum of 600 spaces, an increase of c. 400 to that existing at present. The Scoil Mhuire na Trócaire capacity will also expand by c. 60 places by Q1 2022. In this regard, primary school capacity is well placed to absorb the potential demand arising from the proposed development.

- 2.59 An additional c. 64 places may arise for secondary school-aged children, which is a high estimate based on a household size of 2.75. Ardee Community School is currently being extended to cater for an additional 200 students by the 2023/2024 academic year. This extended capacity will cater for the potential need arising from the proposed development. Furthermore, secondary school places are not normally required immediately for a new development and that the catchment area for secondary schools can be significantly larger, as students will travel further for particular schools such as private schools and Gael Scoils as well as boarding schools. This may contribute to a lower actual need arising from Phase 4 at Bridgegate.
- 2.60 The assessment concludes that adequate capacity will exist at schools within Ardee to cater for the projected numbers of primary and secondary school students arising from the proposed development.

7. Address issues raised in the report of Irish Water to An Bord Pleanála dated 15th October 2020.

- *Please refer to Section 6.1 of the Engineering Services Report prepared by CS Consulting*

8. A material contravention statement, in respect to any and all elements of the development that may materially contravene the Ardee Local Area Plan and the Louth County Development Plan objectives or policies applicable to the site, whether, core strategy, density, connectivity, housing typology, car parking, open space or other.

- *Please refer to Statement of Material Contravention prepared by John Spain Associates*

- 2.61 It is considered that the proposals may contravene the Louth CDP 2021-2027 on various items as detailed within the accompanying Statement of Material Contravention prepared by John Spain Associates. The Ardee Local Area Plan 2010-2016 has now expired.

- 2.62 It is respectfully requested that An Bord Pleanála have regard to the justification set out within the Statement of Material Contravention of the Louth County Development Plan and consider the proposed development acceptable, notwithstanding the potential that the proposal may be a material contravention of the Louth County Development Plan 2021-2027.

9. An Appropriate Assessment Screening Report or a Natura Impact Statement, as may be necessary.

- *Please refer to AA Screening Report and Natura Impact Statement prepared by Altamar*

2.63 We refer the Board to the enclosed Appropriate Assessment screening report and Natura Impact Statement prepared by Altemar in accordance with the requirements of Article 6(3) of the EU Habitats Directive, which has been produced to identify potential impacts of the development on European sites, Annex species or Annex habitats.

2.64 It states:

“In a strict application of the precautionary principle, it has been concluded that significant effects on the Dundalk Bay SAC and Dundalk Bay SPA are likely from the proposed works in the absence of standard control or mitigation measures, primarily as a result of direct hydrological connection to the site via the Rathgory Tributary and River Dee and possible downstream impacts from the project during the in-stream, construction landscaping and drainage works. For this reason, a NIS was carried out to assess whether the proposed project, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites conservation objectives, will adversely affect the integrity of the European Site. All other European sites were screened out at initial screening.

We conclude that we have demonstrated on the basis of the best scientific information available which we consider is adequate to make this conclusion that the project alone or in combination with other plans or projects will not have an adverse effect on the integrity of the Dundalk Bay SAC and Dundalk Bay SPA in view of their conservation objectives. No in combination effects are foreseen. In combination effects have been excluded.”

2.65 The report concludes:

“No significant effects are likely on European sites, their qualifying interests or conservation objectives. The proposed project will not will adversely affect the integrity of European sites.”

3.0 CONCLUSION

3.1 This document summarises how the points raised in the pre-application consultation opinion from An Bord Pleanála (ABP) in relation to the proposed strategic housing development for residential development on lands at Bridgegate, Rathgory & Mulladrillen, Ardee, County Louth have been fully addressed by the Applicant and design team prior to lodgement of this application.

3.2 All specific information requested by ABP is now submitted with the application. Please refer to the accompanying documentation for further details.

3.3 Taking consideration of the Opinion which states that ABP ‘*is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development*’, the proposals have been subject to an amended design approach in terms drainage and flood strategy, permeable links through the site and open space and roads infrastructure in the context of the policies and objectives of the Louth County Development Plan 2021-2027. In this regard, the development now submitted is considered to constitute a reasonable basis for an application for strategic housing development.

- 3.4 The prescribed authorities identified in the pre-application consultation opinion from ABP have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 3.5 It is considered that the proposals comprise a high-quality residential development which will integrate successfully with its surroundings, enhance the environment in the location through the provision of significant public open space and public park as well as road infrastructure facilitating links to adjoining lands and a crèche and community building, thus contributing positively to the settlement of Ardee and meeting an identified housing need. Permeable connections ensure the development links with adjoining lands and provides routes to local facilities and Ardee town centre. A bus stop is included on site to promote sustainable modes of transport and reduce reliance on the private car.
- 3.6 It is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines as set out in the accompanying Statement of Consistency and Planning Report prepared by JSA.