



STATEMENT OF CONSISTENCY & PLANNING REPORT RESIDENTIAL DEVELOPMENT Dunleer

Louth County Council

April 2024

SUBMITTED ON BEHALF OF:



Comhairle Contae Lú
Louth County Council

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1.0 Introduction

Hughes Planning and Development Consultants, No. 85 Merrion Square, Dublin 2 have prepared this Statement of consistency with the Louth County Development Plan 2021-2027 on behalf of Louth County Council in support of a proposed housing development on lands off the R170, Dunleer, County Louth. The proposed development, as per the description of development contained within the statutory planning notices, will consist of the following:

The construction of 70no. houses including 9no. 2-bed bungalows, 24no. two storey 2-bed houses, 18no. two storey 3-bed houses, 5no. two storey 4-bed houses, and 2no. 3-bed bungalows, and 12no. sheltered accommodation 2-bed bungalows on a site of 3.17 hectares in the townland of Ravel, Dunleer, Co. Louth. The development will also include the construction of new connections to the existing estate road; provision of new cycleway, footpath, and public lighting along the boundary with the R170; new estate roads and homezones within the site; 123no. car parking spaces including both on-street and in-curtilage parking; cycle parking; hard and soft landscaping including public open spaces, playground, and private gardens; boundary treatments; ESB substation; lighting; laying of underground sewers, mains and pipes; underground pump station and attenuation tank; and all associated works.

This application is in accordance with Section 179 of the Planning and Development Act 2000(as amended) which exempts residential development from the requirements of Part 8 of the Act. This measure will allow for accelerated delivery of social, affordable and cost-rental housing by local authorities by way of exemption from the local authority's own development 'Part 8' process in section 179 of the Planning and Development Act 2000, as amended (the Act) in strictly defined circumstances.

The amendments to the Act and the Planning and Development Regulations 2001, as amended (the regulations) are balanced with the need to provide for the accelerated delivery of social and affordable housing while also ensuring proper planning and sustainable development by means of the introduction of a temporary time-bound exemption from the 'Part 8' process for the approval of local authority own development housing projects on local authority or State-owned lands.

This planning amendment will assist local authorities in accelerating housing delivery. In order to comply with Section 179 of the Act, the planning authority must satisfy the requirements listed below in Table 1.0.









Requirement as per S.179a	Requirement Met
Development carried out by Local Authority	
Development does not materially contravene the development plan	
Accords with strategy in the development plan for the area	
Does not require EIAR	
Does not require Appropriate Assessment	
Land is owned by the planning authority/state	
Lands is zoned for residential use	
Land has access, or can be connected, to public infrastructure and facilities, including roads and footpaths, public lighting, foul sewer drainage, surface water drainage and water supply, necessary for dwellings to be developed and with sufficient service capacity available for such development	

Table 1.0 Compliance with Section 179a of the Planning and Development Act

The purpose of this report is to provide background information on the site, a description of the proposed development, and to assess the development against the policies of the Louth County Development Plan 2021-2027.

2.0 Site Location and Description

The subject site comprises an agricultural field 2.72 Ha in size and is located on the eastern side of the R170 on the edge of Dunleer town, adjacent to a recently built social housing development known as Raval Grange. The subject site is located adjacent to Scoil Bhride NS. The subject site is located close to the town centre and the town's major employer, Glen Dimplex.

The subject site is located to the east of the M1 motorway from Dublin to Belfast and west of the Dublin to Belfast railway line.



Figure 1.0 Aerial image showing the immediate contact of the subject site (red outline)



Figure 2.0 Aerial image showing wider locational context surrounding the subject site (red star)



Figure 3.0 Street view showing the site

3.0 Proposed Development

The proposed development consists of the construction of 70 no. dwellings comprising 45 no. 2-bed units, 20 no. 3-bed units, and 5 no. 4-bed units. Parking will be provided for each dwelling, with a total of 123 no. spaces. Twelve of the dwellings on the southern side of the site will form part of a sheltered housing scheme which will have a communal garden to the west of the dwellings.

The development provides a diverse mix of unit types catering for 3-person households right up to 7-person households.

House Type	Details	Number Proposed
A	2-bed, 3-person	21
B	2-bed, 4-person	24
C	3-bed, 5-person	18
E	4-bed, 7-person	2
F	4-bed, 7-person	3
G	3-bed, 5-person	2
TOTAL		70

Table 2.0 Proposed house types.

Public open space will be provided at several locations throughout the site.

The proposed development provides for internal roads, street lighting, footpaths, cycle paths, foul and surface water drainage works, landscaping, and all associated site development works necessary to facilitate the development.



Figure 4.0 Proposed site layout plan

4.0 Planning Policy Context

This section of the report will examine the planning framework, including national, regional and local that informs the use and development of the subject lands and will assess the proposed development against the various policies and requirements contained therein. Documents of note include Project Ireland 2040 – National Planning Framework (2018), The Regional Spatial and Economic Strategy for the Eastern and Midlands Region (2019) and the Louth County Development Plan 2021-2027. It is noted that the new County Development Plan, replaces the previous Drogheda and Dundalk Development Plans, it is noted that Urban Area Plan/Local Area Plans will subsequently be prepared for these towns during the lifetime of the current Louth County Development Plan 2021-2027.

4.1 Relevant National and Regional Policy

This section of the statement will examine the planning framework, including national, regional and local, that informs the use and development of the subject land. Documents of note are as follows:

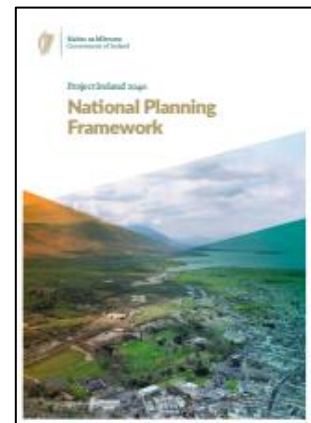
- Project Ireland 2040 – National Planning Framework (2018);
- Housing for All – A New Housing Plan for Ireland (2021);
- Regional Spatial and Economic Strategy for the Eastern and Midlands Region (2019);
- Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007); and
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

4.1.1 Project Ireland 2040 – National Planning Framework (2018)

The Project Ireland 2040 - National Planning Framework (2018) seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. The following target is outlined in relation to national growth:

‘We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan, we are targeting these five cities for 50% of overall national growth between them, with Ireland’s large and smaller towns, villages and rural areas accommodating the other 50% of growth.’

More specifically, strategies are included in Chapter 2.2 of the Planning Framework which seeks to target a greater proportion (40%) of future housing development to be within and close to the existing ‘footprint’ of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.



The National Planning Framework outlines that:

‘a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages.’

The proposed development is located on a greenfield site which is suitably zoned for residential development. The development of this site is consistent with the sequential development of lands in Dunleer, as this is the next available, serviced site along the R170. The subject site is also connected to the adjoining residential development.

The subject site is located on a direct route into the town which is served by multiple bus services. The National Planning Framework also pushes for the growth in population in jobs in the counties surrounding Dublin and the provision of additional dwellings at this location will bolster the housing needs of the town. The proposed location of the site will ensure that growth is contained within the town’s boundary, and will offer ‘improved housing choice, transport mobility and quality of life.’

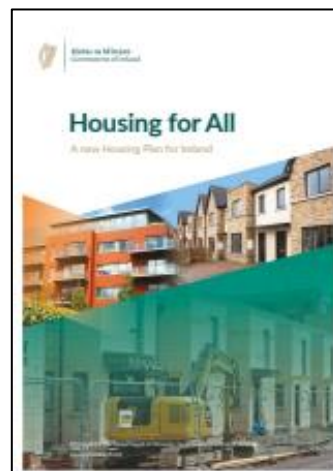
The proposed development is consistent with the above as it involves the development of underutilised land which is near a number of public transport services. The proposed development complies with the relevant National Policy Objectives identified in the National Planning Framework.

4.1.2 Housing for All – A New Housing Plan for Ireland

The 'Housing for All - A New Housing Plan for Ireland' was published in September 2021 as part of the Irish Government's 'Our Shared Future' programme which, in turn, sets out the Government's mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has *access to sustainable, good-quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering a high quality of life.*

The plan seeks to increase new housing supply to an average of at least 33,000 new units per year with specific pathways outlined to achieve the four overarching objectives of the plan which are:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*



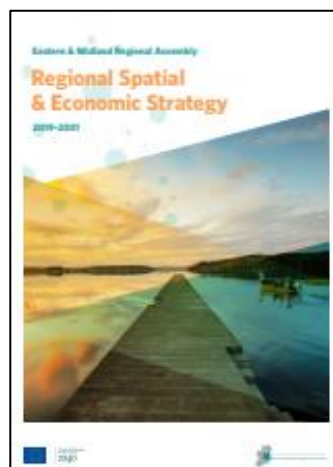
We submit that the proposal is consistent with the above policy as it provides an appropriate quantum of residential accommodation on a zoned and serviced urban site. The provision of residential units on site, in the manner proposed under this application results in increased social housing provision and provides for the efficient use of zoned and serviced land. The proposed development responds to a recognised need, at a national level, for social housing and is consistent with policy in this regard.

4.1.3 Regional Spatial and Economic Strategy for the Eastern and Midland Region, 2019

The Regional and Spatial Economic Strategy for the Eastern and Midland Regional Assembly (RSES) was published on 28th June 2019. It is a strategic plan and investment framework to shape future development and to better manage regional planning and economic development throughout the Region to 2031 and beyond. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. The RSES builds on the foundations of Government policy in Project Ireland 2040 and replaces the current Regional Planning Guidelines (RPGs).

Dunleer is a Self-sustaining Growth Town which is defined as having a *moderate level of jobs and services – it includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.*

It is also located in the Dublin-Belfast Economic Corridor between the county's two regional growth centres of Dundalk and Drogheda.



The proposed development is consistent with the above as it will provide a coordinated approach to providing housing to accommodate the population increase expected in Dunleer moving forward.

Furthermore, the development provides sustainable, compact, sequential growth in line with the RSES criteria listed above.

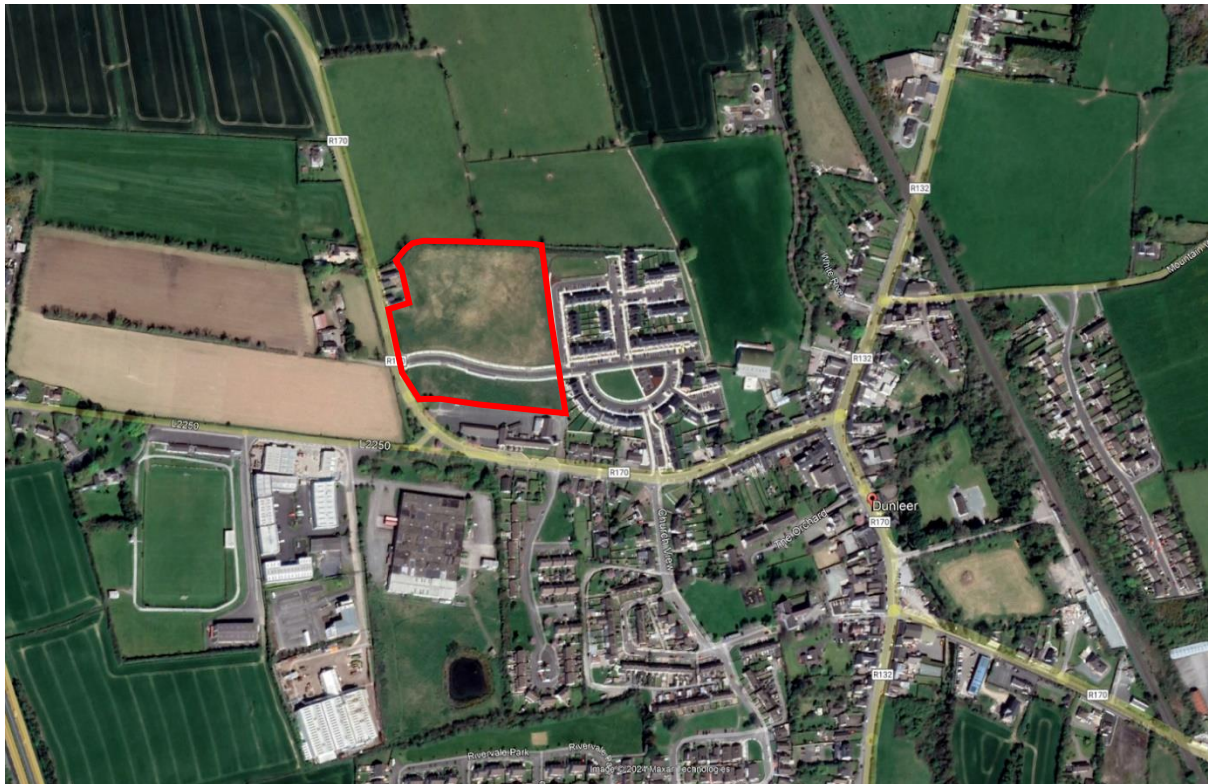


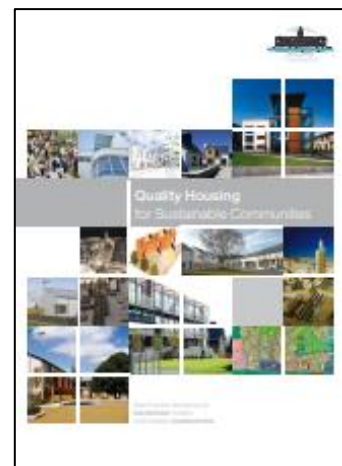
Figure 5.0 Aerial view showing no available serviced lands between the subject site and the town centre

4.1.4 Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007)

The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and the provision of residential amenity and services in new housing schemes.

The subject site is located within Dunleer town centre which features several local amenities such as shops, restaurants, entertainment venues etc. Furthermore, the site is also situated within walking distance of a serviced bus stop located at 550m to the southeast of the site along R132.

Furthermore, the proposed house types have been designed having regard to these guidelines and in particular Table 5.1, which details the minimum space provision for new dwellings and rooms.



As per Table 5.1 of the guidelines, the proposed house types comply with the minimum space requirements as shown overleaf:

eml Type	House Type	Required GFA	Proposed GFA (SQ.M.)	Min. Living Room	Proposed Living Room	Min. Aggregate Living Area	Proposed Aggregate Living Area	Min. Aggregate Bedroom	Proposed Aggregate Bedroom	Min. Storage	Proposed Storage
A	2-bed, 3-person	60	64.5	13	27	28	27	20	21.2	3	3
B	2-bed, 4-person	80	82.6	13	13.1	30	30.5	25	24.7	4	4.7
C1	3-bed, 5-person	92	96.3	13	14.6	34	34	32	33.3	5	5.6
E	4-bed, 7-person	110	138.1	15	18.2	40	39.8	43	49.1	6	8.6
F	4-bed, 7-person	110	114.8	15	17	40	39.8	43	43.7	6	6.5
G	3-bed, 5-person	82	126.7	13	22.3	34	48	32	40.2	6	6.2

Table 3.0 Compliance with minimum standards for space and gross floor area as per Table 5.1 of the guidelines

The proposed house types largely comply with the standards listed above. There are several instances where the proposed aggregate living area and bedroom area are below the minimum requirement, however, the discrepancies range from 200 to 300 cm². This is not considered a material contravention of the guidelines.

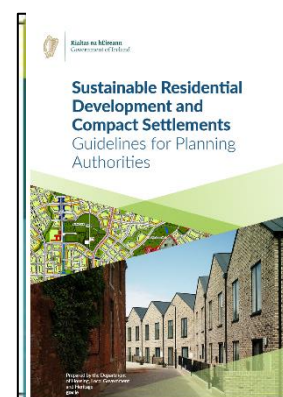
4.1.5 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines or Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009). With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policies and guidelines about the planning and development of urban and rural settlements.

As a Small to Medium Sized Town, the guidelines list the following key priorities in order of priority are:

- a) *strengthen town centres,*
- b) *protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
- c) *realise opportunities for adaption, reuse and intensification of existing buildings and for backland, brownfield and infill development, and*
- d) *deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the settlement.*

The guidelines provide Special Planning Policy Regulations as follows:



SPPR 1 - Separation Distances

It is a specific planning policy requirement of these Guidelines that statutory development plans¹⁵ shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms¹⁶ at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

SPPR 2 - Minimum Private Open Space Standards for Houses

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

1 bed house	20 sq.m
2 bed house	30 sq.m
3 bed house	40 sq.m
4 bed + house	50 sq.m

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

Policy and Objective 5.1 - Public Open Space

It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.

The proposed development complies with the SPPRs listed in the Sustainable Residential Development and Compact Settlements Guidelines or Planning Authorities.

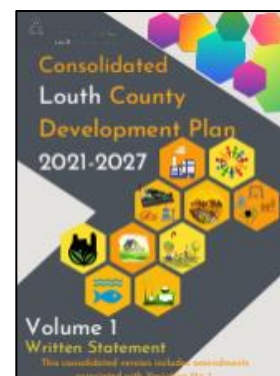
4.2 Louth County Development Plan 2021-2027

The Louth County Development Plan 2021-2027 is the relevant statutory development plan for the proposed application site.

4.2.1 Land Use Zoning

According to the zoning objectives contained within the Louth County Development Plan 2021-2027 the proposed development site is subject to two zoning objectives. The site is predominantly zoned 'A2 – New Residential Phase 1', the objective of which is to:

'Provide for new residential communities with ancillary community facilities, neighbourhood facilities as considered appropriate'



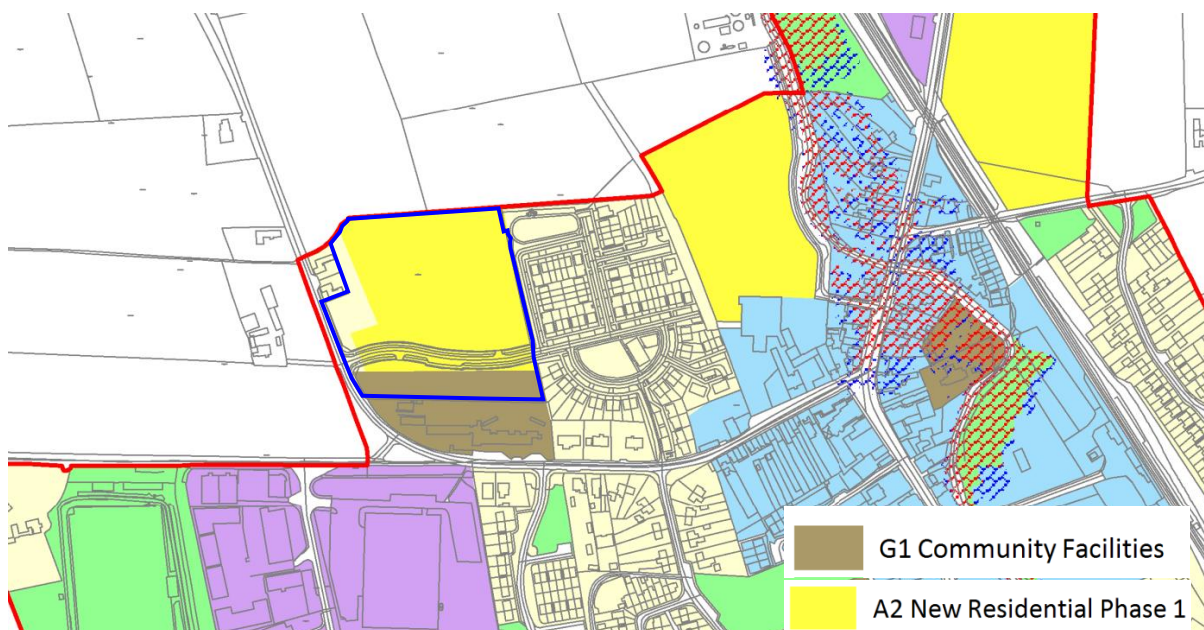


Figure 6.0 Extract from the Drogheda Zoning Map, showing the subject lands zoned A2 New Residential

The zoning matrix included in the Development Plan indicates 'permissible uses' and 'open for consideration uses' uses in 'A2' zones. Permissible uses are generally acceptable subject to the normal planning process and compliance with the relevant policies and objectives, standards and requirements set out in the Plan. The following uses are 'permissible' in the 'A2' zones:

Generally Permitted Use

Allotments, B&B/ Guest House, Childcare Facility, Community Facility, Education Facility (Primary or Second Level), E- Charging Facility, Home Based Economic Activities, Nursing Home, Park/Playgrounds, Place of Worship, Recreational/Amenity Open Space, Recreational/Sports Facility, Residential, Residential Institution, Retirement Village, Sheltered Accommodation, Third Level Student Accommodation, Traveller Accommodation, Utilities.

In respect of the above, it is noted that residential is listed as generally permitted uses within A2 zoned lands, therefore the proposed development complies with the zoning objectives of the site.

A portion of the site to the south is zoned G1 Community Facilities, the objective of which is to:

'To provide for and protect civic, religious, community, education, health care and social Infrastructure'

The zoning matrix included in the Development Plan indicates 'permissible uses' and 'open for consideration uses' uses in 'G1' zones. Permissible uses are generally acceptable subject to the normal planning process and compliance with the relevant policies and objectives, standards and requirements set out in the Plan. The following uses are 'permissible' in the 'G1' zones:

Generally Permitted Use

Allotments, Cemetery, Childcare Facility, Community Facility, Crematorium, Education Facility (Primary or Second Level), Education Facility (Third Level or Training Centre), E- Charging Facility, Health Care Centre, Healthcare Practitioner, Hospital, Nursing Home, Park/Playgrounds, Place of Worship, Recreational/Amenity Open Space, Recreational/Sports Facility, Recycling Facility (Civic & Amenity), Utilities.

Open for Consideration

*Bring Banks, Car Parks, Cycleway/Walkway trails, Funeral Homes/Mortuary, Residential Institution, Retirement Village, **Sheltered Accommodation**, Telecommunications Structures, Training Centre.*

It is noted that Sheltered Accommodation is an open for consideration use on G1-zoned lands. As per the site layout plan prepared by eml Architects, it is proposed to provide 12 no. type A units which will straddle the two zoning objectives. These units are single-storey and are universally designed to provide accommodation for residents aged 55 and above. The Louth County Development Plan defines sheltered accommodation as follows:

Sheltered accommodation are housing schemes with on-site communal facilities for assisted independent living. Sheltered housing schemes usually have an on-site warden and include care supports such as the provision of meals and health care assistance. Communal on-site facilities can include recreation areas, alarm systems and a laundry.

As per the site layout plan, the dwellings will be provided with a communal amenity space to the west of the dwellings with age-friendly furniture and a reflection garden. All units are 2-bed to support right-sizing. They are all universally designed bungalows to assist mobility, and all bathrooms in the units will be fitted with level-access showers. Alarm systems will be installed to all units. Louth County Council's Age Friendly Officer will visit the development to ensure the needs of the residents are being met in line with the council's policies for such housing.

It is considered that the proposed development complies with the zoning objectives of the site.

4.2.2 Core Policy

The Vision of the Core Strategy is to *'promote a more consolidated compact urban form and ensures that future growth is based on the principles of sustainable development, delivering a high-quality living and working environment meeting the needs of all residents.* As noted in the County Development Plan, the settlement of Dunleer is included within the core area of Louth County. The plan states that Dunleer is a *regionally important local driver providing a moderate level of jobs and services for the resident population and surrounding catchments. Growth will be balanced and at sustainable levels including brownfield and infill development with a focus on the commensurate delivery of employment and services and improving the quality of life for all.*

Moreover, the following Core Strategy Objectives are noted:

Policy Objective	
CS 1	To secure the implementation of the Core Strategy and the Settlement Strategy in so far as practicable, by directing sustainable growth towards the designated settlements, subject to the availability of infrastructure and services.

The subject site is located in Dunleer and is less than 600m from the town centre. The town centre is accessible by foot. The subject site is located next to developed lands and therefore satisfies the sequential test.

Policy Objective	
CS 2	To achieve compact growth through the delivery of at least 30% of all new homes in urban areas within the existing built up footprint of settlements, by developing infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites.

The subject site is located next to a residential development with access being provided through the subject site, and therefore satisfies the sequential test. The site is also directly connected to the necessary infrastructure to facilitate residential development.

Policy Objective

CS 3	To support and manage the self-sufficient sustainable development of all settlements in a planned manner, with population growth occurring in tandem with the provision of economic, physical and social infrastructure.
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The subject site is zoned appropriately for residential development and is serviced by the necessary infrastructure including a newly constructed access road. The subject site is located near a school and local employment centre. This complies with Policy Objective CS3.

Policy Objective

CS 4	To apply phasing to the delivery of new residential development as indicated on the zoning maps for the applicable settlements, whereby residential development, other than infill, brownfield or mixed use development will generally only be permitted on Phase 1 lands. Where lands zoned 'New Residential Phase 1' are not being brought forward for development in particular areas and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing during the lifetime of this Plan appropriately located 'New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.
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The subject site is zone A2 New Residential Phase 1. The delivery of housing on this site complies with Objective CS4.

Policy Objective

CS 5	To support the progression and delivery of projects that would facilitate the creation of vibrant, sustainable communities and the rejuvenation of towns and villages, including any project to be funded by the Urban or Rural Regeneration and Development Fund.
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The proposed development will add additional housing in Dunleer which has been earmarked for growth. The proposed development is located close to schools, employment centres and the town centre. This complies with Policy Objective CS5.

Policy Objective

SS 46	To support the role of Dunleer as a Self-Sustaining Growth Town, which shall be complementary to the Regional Growth Centres, and to facilitate balanced population and economic growth that will meet the needs of the residents of Dunleer and its hinterland.
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The proposed development will add additional housing in Dunleer which has been earmarked for growth. The proposed development is located close to schools, employment centres and the town centre. This complies with Policy Objective SS46.

Policy Objective

SS 48	To support the creation of a sustainable compact settlement in Dunleer that provides opportunities for walking and cycling and to encourage a minimum density of 25 units/ha for new residential developments.
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The proposed development will have a density of 26 dwellings per hectare. This complies with Policy Objective SS48.

4.2.3 Housing and Social Infrastructure Policy

Policy Objective	
HOU 10	To continue to support the creation of sustainable communities throughout the County for people across all the life stages by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where walking, cycling, and public transport is prioritised.

The proposed development includes the provision of single-storey units and ensures universal access which will allow people of varying ages and mobility to live in the development upon completion. The proposed development is well served by public transport, therefore allowing for sustainable modes of transport for future residents of the scheme. This complies with Policy Objective HOU10.

Policy Objective	
HOU 15	To promote development that facilitates a higher, sustainable density that supports compact growth and the consolidation of urban areas, which will be appropriate to the local context and enhance the local environment in which it is located.

The proposed development will have a density of 26 dwellings per hectare and complies with Policy Objective HOU15.

Policy Objective	
HOU 17	To promote and facilitate the sustainable development of a high quality built environment where there is a distinctive sense of place in attractive streets, spaces, and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise.

The proposed development has been designed by eml Architects and is distinct in its design and character. The design has regard to the Urban Design Manual and creates a sense of place for future residents through landscaped streets, provision of high-quality open space, and the use of quality architecture for the house designs. This complies with Policy Objective HOU17.

Policy Objective	
HOU 18	To develop sustainable and successful neighbourhoods through the consolidation and redevelopment of built-up areas and promote new compact mixed-use urban and rural villages served by public transport and green infrastructure.

The proposed residential development is located along a bus route providing services to Drogheda, Dundalk and Dublin. This complies with Policy Objective HOU18.

Policy Objective

HOU 19	To enhance and develop the fabric of existing urban and rural settlements in accordance with the principles of good urban design including the promotion of high quality well-designed visually attractive main entries into our towns and villages.
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The proposed development utilises landscaping across the streetscape to create pleasant spaces for people to traverse. This complies with Policy Objective HOU19.

Policy Objective

HOU 20	To require a design led approach to be taken to sustainable residential development in accordance with the 12 urban design principles set out in the ' <i>Urban Design Manual – A Best Practice Guide (2009)</i> ' and any subsequent guidance, to ensure the creation of quality, attractive, and well connected residential areas and neighbourhoods.
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The proposed development has been designed in the context of the Urban Design Manual. This complies with Policy Objective HOU20.

Policy Objective

HOU 21	To ensure that new residential developments are consistent, in so far as practicable, with the ' <i>Guidelines on Sustainable Residential Development in Urban Areas</i> ' in creating attractive, sustainable, climate resilient and healthy communities.
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The proposed development has been designed in the context of the Guidelines on Sustainable Residential Development. This complies with Policy Objective HOU21.

Policy Objective

HOU 22	To require residential developments to prioritise and facilitate walking, cycling, and public transport and to include provision for links and connections to existing facilities and public transport nodes in the wider neighbourhood.
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The proposed development has been provided with adequately designed footpaths which connect to the R170 footpaths and cycle paths. There are public transport routes along R170. This complies with the Policy Objective HOU22.

Policy Objective

HOU 23	To require the layout of residential developments to take account of the <i>Design Manual for Urban Roads and Streets (2019)</i> in the provision of pedestrian and cycling infrastructure and crossing points and the design of estate roads and junctions.
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All roads and footpaths have been designed having regard to DMURS. This complies with the Policy Objective HOU23.

Policy Objective

HOU 24	To require the provision of high quality areas of public open space in new residential developments that are functional spaces, centrally located, and passively overlooked.
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Public open space has been provided throughout the site, providing easy access for future residents. The open space will be landscaped as per the Landscape Plan prepared by Áit Urbanism and Landscape. All spaces are located next to clusters of housing which overlook the spaces. This complies with the Policy Objective HOU24.

Policy Objective

HOU 26	To require the provision of an appropriate mix of house types and sizes in residential developments throughout the County that would meet the needs of the population and support the creation of balanced and inclusive communities.
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The scheme provides a mix of dwellings types including 45 no. two bed (64% of scheme) (21 of which are single storey), 20 no. 3-bed (29% of scheme), and 13 no. 4 bed units (7% of scheme). It is noted that 12 no. units will form part of a sheltered housing scheme. This is considered a balanced mix and provides for a diverse mix of residents upon completion. This complies with the Policy Objective HOU26.

Policy Objective

HOU 27	To require the provision of single storey properties in residential developments in excess of 100 units at a rate of at least 1% single storey units per 100 residential units unless it can be demonstrated by evidence based research carried out by an appropriately qualified professional that there is no demand for this type of accommodation.
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The scheme provides 70 no. dwellings and therefore is exempt from providing 1% single storey units. Nonetheless, the scheme provides for 30% of the scheme as single storey units.

Policy Objective

HOU 28	To encourage innovation in design that delivers buildings of a high quality that positively contribute to the built environment and local streetscape.
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The scheme has been designed having regard to the contextual location of the site. It provides for 70 no. dwellings in a range of sizes that will encourage sustainable development. This complies with the Policy Objective HOU28.

Policy Objective

HOU 29	To seek that all new residential developments in excess of 20 residential units provide for a minimum of 30% universally designed units in accordance with the requirements of <i>'Building for Everyone: A Universal Design Approach'</i> published by the Centre for Excellence in Universal Design.
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The scheme provides 36% universally designed units.

Policy Objective

HOU 30	To encourage building design and layout that maximises daylight and natural ventilation and incorporates energy efficiency and conservation measures that will improve the environmental performance of buildings in line with best practice.
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All units will receive adequate daylight and have been provided with ventilation. They will be A-rated dwellings upon completion. This complies with the Policy Objective HOU30.

Policy Objective	
SC 11	To require that all new residential development applications on lands greater than 1ha or for 100 units or more are accompanied by a Social Infrastructure Assessment to determine if community facilities in the area are sufficient to provide for all future residents. Where deficiencies are identified proposals will be required to accompany the planning application to address the deficiency, either through direct provision on site or such other means, and in a manner acceptable to the Council.

A Social Infrastructure Audit has been prepared by Thorton O'Connor Town Planning and submitted under a separate leaf. The audit submitted with the application complies with Policy Objective SC11.

Policy Objective	
SC 17	To require the provision of play features that can be used for recreational purposes in all new housing developments exceeding 100 residential units or more.

The proposed development comprises 70 no. dwellings and is below the threshold.

Policy Objective	
SC 35	To support and facilitate the sustainable provision of childcare facilities in appropriate and suitable locations and seek their provision concurrent with new residential development, all having regard to the <i>Childcare Facilities Guidelines for Planning Authorities (2001)</i> and <i>Childcare Regulations (2006)</i> and any subsequent guidelines, in consultation with the Louth County Childcare Committee. Such facilities will be directed to settlements identified in the Settlement Hierarchy.

The proposed development will not provide a creche it contains less than 75 dwellings. The proposed development therefore complies with Policy Objective SC35.

It is submitted that the proposed development is therefore in accordance with the objectives of the 'Core Strategy' as set out in the Louth County Development Plan 2021-2027.

4.2.4 Movement and Transport Policy

Policy Objective	
MOV 3	To facilitate the integration of land use with sustainable transportation infrastructure in accordance with the requirements of RPO 8.1 in the RSES by supporting the creation of a critical mass of population and employment related development that would maximise investment in public transport infrastructure and create compact, sustainable settlements.
Policy Objective	
MOV 4	To promote sustainable higher density development along public transport corridors.

The subject site is located on R170 which is served by Bus Éireann routes 100 and 100X. This provides access to Dundalk, Drogheda and Dublin. The proposed density is in keeping with the established pattern of development in the immediate area which averages at 26 dwellings per hectare. This complies with Policy Objectives MOV3 and MOV4.

Policy Objective	
MOV 6	To promote and support the principles of universal design ensuring that all environments are inclusive and are accessible to and can be used to the fullest extent possible by all users regardless of age, ability or disability.

The streetscape of the proposed development has been designed in compliance with DMURS and provides universal access for future residents. In addition, 36% of the proposed housing units are designed as per universal access guidelines. This complies with Policy Objective MOV6

Policy Objective	
MOV 7	To support a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking and the attainment of any national targets relating to modal change published during the life of this Plan.

The subject site is located on R170 which is served by Bus Éireann routes 100 and 100X. This provides access to Dundalk, Drogheda and Dublin. The site is also accessible via footpaths and cycle paths on the R170. This complies with Policy Objectives MOV7.

4.2.5 Natural Heritage, Environment, and Green Infrastructure

Policy Objective	
NBG 9	To ensure that proposals for development, where appropriate, protect and conserve biodiversity sites outside designated sites and require an appropriate level of ecological assessment by suitably qualified professionals to accompany development proposals likely to impact on such sites.

As part of the application, an Appropriate Assessment Screenings Report and Ecological Impact assessment have been prepared by Flynn Furey Environmental Consultants.

Policy Objective	
NBG 13	Development sites must be investigated for the presence of invasive species, which if present must be treated and/or eradicated in accordance with best practice. Where appropriate, Invasive Species Management Plans will be prepared for such sites.

The Ecological Impact Assessment, prepared by Flynn Furey Environmental Consultants, includes an invasive species survey. This complies with Policy Objective NBG13.

Policy Objective	
ENV 38	To retain and protect significant stands of existing trees/ hedgerows/woodlands, and seek increased planting of native trees, where appropriate, in new developments.
Policy Objective	
ENV 39	Protect and preserve existing hedgerows in new developments, particularly species rich roadside and townland boundary hedgerows, and where their removal is necessary during the course of road works or other works seek their replacement with new hedgerows of native species indigenous to the area.

The riparian area which includes extensive vegetation alongside the stream to the northern boundary will be retained and supplemented with a low-maintenance buffer strip of tree and meadow planting, the trees will include natives such as Hazel, Hawthorn and Bird Cherry. This complies with Policy Objectives ENV38 and ENV39.

Policy Objective	
NBG 44	To protect, maintain, and enhance the natural and organic character of the watercourses in the County, including opening up to daylight where safe and feasible. The creation and/or enhancement of riparian buffer zones will be required where possible. All proposed coastal walkways will be required to comply with the Habitats, EIA and SEA Directives

Policy Objective	
IU 25	To ensure that no development including clearing or storage of materials takes place within a minimum distance of 10m measured from each bank of any river, stream or watercourse.

A stream runs along the northern boundary of the site. As per the proposed site layout plan, a 10m riparian buffer zone is maintained. There is however one pinch point where the buffer reduces to 7.63m. This is considered acceptable as the development plan states that *a minimum setback of at least 10m (or other width, as determined by the Council) will be required on each side of the watercourse, depending on the width of the watercourse.* Given the width of the stream is narrow, the proposed pinch point is considered acceptable and in compliance with Policy Objectives IU 25 and NBG 44.

4.2.6 Development Management

The Louth County Development Plan 2021-2027 requires a high standard of residential development, which provides good quality accommodation and also protects the character and amenities of the area. This is embedded in the zoning objective of the lands, which seeks to provide high-quality residential development. This is in accordance with the following national policy documents which have been discussed previously in this report:

- i) *The Guidelines on Quality Housing for Sustainable Communities, DEHLG, (2007);*
- ii) *The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG, (2009);*
- iii) *Urban Design Manual: A Best Practice Guide, DEHLG, (2009);*
- iv) *Sustainable Urban Housing: Design Standards for New Apartments, DHPLG, (2018);*
- v) *Urban Development and Building Height Guidelines, DHPLG, (2018);*

- vi) *The Design Manual for Urban Roads and Streets, DTTAS and DECLG, (2013 and updated in 2019); and*
 vii) *Permeability Best Practice Guide, NTA, (2015).*

The proposed development has been designed having regard to the guidelines and policies listed above.

Density and Plot Ratio

Section 13.8.4 of the Louth County Development Plan 2021-2027 sets out the standards in relation to density and plot ratio, having regard to guidelines set by *Guidelines for Planning Authorities on Sustainable Residential Developments in Urban Areas (Cities, Towns and Villages), 2009*. With respect to multi-unit developments, the plan states:

'The plot ratio would be a more applicable method, as this is more reflective of the range of unit sizes'

The recommended density and plot ratios are set out in Table 13.3. of the development plan. This table makes specific reference to the Dunleer, which is displayed in Figure 8.0 below.

Settlement Category	Recommended Minimum Density per Hectare		Plot Ratio	
	Town/Village Centre	Edge of settlement	Town/Village Centre	Edge of settlement
Regional Growth Centres	50	35	2	1
Dundalk and Drogheda				
Self-Sustaining Growth Town	35	25	1	0.5
Ardee and Dunleer				

Figure 7.0 Table 13.3 from the Louth County Development Plan 2021-2027 displaying appropriate density and plot ratio

The recommended minimum density is 25 units per hectare and plot ratio is 0.5. This development will provide a density of 26 units per hectare. The plot ratio is 0.22 and complies with Table 13.3.

The proposed development accords with Section 13.8.4 of the Development Plan and provides for an appropriate density of development on the developable areas of the site.

Design Statement

The development plan requires all development comprising 10 no. units or more to include a Design Statement. This has been prepared by eml Architects and included under a separate leaf.

Privacy

Section 13.8.9.1 of the Louth County Development Plan sets out standards for residential amenity with a particular focus on privacy. The plan emphasises that:

*'Whilst some degree of overlooking between properties is likely to occur in urban areas, efforts shall be made to minimise the extent of this overlooking where this is possible. A minimum of **22 metres separation** between directly opposing first floor habitable rooms in residential properties shall generally be observed. This separation distance is not required for windows in non-habitable rooms such as bathrooms, stairwells or landings.'*

It is noted that this requirement is affected by the introduction of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities in 2023. The guidelines allow for a reduction in separation distances to 16 m as per SPPR1 which states:

It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces. There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

All of the proposed dwellings contain appropriate separation distances as per the above guidelines.

Private Open Space

Private open space requirements for houses are set out in Table 13.5 of the Development Plan. Each house is provided with a rear back garden all of which exceed the minimum requirements listed below.

Unit Type	Town Centre and Infill / Brownfield Locations	Greenfield / Suburban locations
Dwelling	Minimum private open space requirement (m²)	Minimum private open space requirement (m²)
1-2 Bedroom	50	60
3 or More Bedrooms	60	80

Figure 8.0 Louth County Development Plan table 13.4 displaying private open space requirements for houses

It is noted that this requirement is affected by the introduction of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities in 2023. The guidelines allow for a reduction in the size of private open space as per SPPR2 which states:

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sq.m
- 2 bed house 30 sq.m
- 3 bed house 40 sq.m
- 4 bed + house 50 sq.m

All rear gardens comply with the above guidelines.

Boundary Treatments

in residential developments shall consist of the following:

- i) The rear boundary shall consist of a 2-metre-high block wall;
- ii) Side boundaries between properties shall be 2 metres in height. If timber boundaries are to be used they must be bonded and supported by concrete posts;
- iii) Walls bounding any public areas shall be rendered and capped on both sides; and
- iv) Front boundaries along the estate road and between properties shall be agreed upon as part of the planning application. They can be open plan, planted, consist of a low-level wall or railing, or as otherwise agreed with the Planning Authority.

All boundary treatments comply with the development plan requirements. Please refer to the Boundaries Types Drawing prepared by eml Architects for further details.

Landscaping

The development plan requires a landscape plan to be submitted with all planning applications for residential development. A Landscape Plan has been prepared by Áit Urbanism and Landscape.

Dwelling Design and Mix

The development plan seeks to support a variety of household types and tenures, new residential developments, and in particular larger schemes in excess of 25 units shall endeavour to provide an appropriate mix of residential accommodation. Greater consideration shall be given to providing suitable accommodation for older persons and people with a disability. This includes adaptable homes that can be altered to meet the needs of residents through the different stages of life. Developments in excess of 50 units are encouraged to provide single-storey units to meet the needs of older persons.

The scheme provides a mix of dwellings types including 45 no. two bed (64% of scheme) (21 of which are single storey), 20 no. 3-bed (29% of scheme), and 13 no. 4 bed units (7% of scheme). This is considered a balanced mix and provides for a diverse mix of residents upon completion. This complies with the Policy Objective HOU26.

The scheme provides 70 no. dwellings and therefore is exempt from providing 1% single storey units. Nonetheless, the scheme provides for 30% of the scheme as single storey units.

The scheme has been designed with regard to the contextual location of the site. It provides for 70 no. dwellings in a range of sizes that will encourage sustainable development. The scheme provides 36% universally designed units.

The proposed dwelling mix complies with the development plan standards.

Car and Bicycle Parking

Tables 13.11 and 13.12 (below) set out the appropriate standards in relation to car and bicycle parking respectively. Section 13.8.18 'Car and Cycle Parking' provides further guidance on parking provisions for new residential schemes. It is the Planning Authority's recommendation that:

'In new housing areas, car parking is normally provided at the front of properties creating a linear streetscape dominated by hard surfacing.'

Development Type	Area 1	Area 2	Area 3
Residential Dwelling	1 per unit	1 per unit	2 per unit
Apartment	1 apartment	1 per apartment	2 per apartment

Figure 9.0 Car Parking requirements as per the Louth County Development Plan 2021-2027

Development Type	Cycle Parking Requirement	
	Long term	Visitor/Short Stay
Apartment, Flat , Sheltered Housing	Minimum of 1 cycle space per bedroom. For Studio units at least 1 cycle space.	1 space per 2 units
Residential dwelling	1 space per unit	1 space per 5 units

Figure 10.0 Bicycle Parking Requirements as per the Louth County Development Plan 2021-2027

The proposed development is located in Area 2 (Lands located adjacent to high-level public transport services or lands serving a local catchment area) and therefore requires 70 no. spaces for 70 no. dwellings. It is proposed to provide 123 no. spaces therefore, the car parking is in accordance with the County Development Plan 2021-2027. In terms of cycle parking, the development plan notes that 1 cycle space is provided for each residential unit. This has been achieved.

EV Charging

Section 13.16.9 of the development plan requires car parking areas to provide electric charging points, stating:

In all car parking areas, provision shall be made for charging points for electric vehicles. This shall include the necessary wiring and ducting. Pending the publication of guidance on the minimum requirement of these spaces, an assessment shall be made on a case-by- case basis; however, applicants shall strive to provide these charging points in a minimum of 20% of the total spaces.

The proposed development provides EV charging spaces at 20% of the overall number of spaces as well as providing ducting for 100% of spaces as per the development plan.

Disabled Parking

Section 13.16.7 requires new developments to provide disabled parking at a rate of 5%. The proposed development provides 7 no. disabled parking spaces which equates to 5.7%. This does comply with Section 13.16.7 of the development plan.

Public Open Space

Section 13.8.15 of the development plan requires new residential developments to provide public open space at a rate of 15% of the total site area. The proposed development seeks to provide public open space as 20% of the site area, which is above the required quantum.

This complies with the objectives of the development plan.

Play Facilities in Residential Developments

Section 13.8.16 of the development states that *developments of 50 units or more shall include proposals for the provision of a dedicated children's play area designed to the satisfaction of the Planning Authority.*

The proposed development includes a designated playground for children and complies with Section 13.8.16 of the development plan.

5.0 Drainage and Wastewater

Section 13.20.4 of the development plan requires new developments to incorporate SUDs as part of the development. The site has been assessed by Hayes Higgins Partnership, the project engineers, and they determined that the subject site will not support natural infiltration. They noted in their report that:

A site investigation was undertaken to establish the permeability of the site. The site investigation advises the site does not have any available infiltration and as such permeable surfaces and natural infiltration are not viable, refer to Appendix F. As the conditions on site are not favourable to infiltration, a modular attenuation system connected to the existing surface drainage network, via a hydrobrake limiting discharge to 2 L/s/ha, is to be used to dispose of the surface water from the developed site.

The development plan states:

In some exceptional cases, and at the discretion of the Council, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality.

SUDs measures proposed for the site comprise tree pits which will assist with natural attention. The proposal for the subject site is considered to comply with Section 13.20.4 of the development plan.

6.0 Appropriate Assessment

An Appropriate Assessment screening exercise has been completed by Flynn Furey Environmental Consultants and is included under separate cover. In summary, the screening report has concluded that the proposed development does not pose a threat to any nearby Natura 2000 sites.

7.0 Environmental Impact Assessment Screening

An Environmental Impact Assessment screening exercise has been completed by Flynn Furey Environmental Consultants and is included under separate cover. In summary, the screening report has concluded that an EIAR is not required for the proposed development.

8.0 Conclusion

In terms of design, it is considered that the proposed residential development is generally in accordance with the relevant policies and objectives as set out within the Louth County Development Plan 2021-2027.

It is considered that the proposal will result in the appropriate and efficient use of the subject lands which are well-located in proximity to the surrounding national and regional road network, with easy access available to Dunleer town centre. The subject site is located within close proximity to Drogheda and Dundalk and with strong public transport links to Dublin city centre, has the capacity to accommodate additional residential accommodation and respond to the current housing shortage.

This development is being provided in accordance with Section 179(a) of the Planning and Development Act 2000 and must meet the requirements of the Act as shown in Table 4.0 below.









Requirement as per S.179a	Requirement Met
Development carried out by Local Authority	
Development does not materially contravene the development plan	
Accords with strategy in the development plan for the area	
Does not require EIAR	
Does not require Appropriate Assessment	
Land is owned by the planning authority/state	
Lands is zoned for residential use	
Land has access, or can be connected, to public infrastructure and facilities, including roads and footpaths, public lighting, foul sewer drainage, surface water drainage and water supply, necessary for dwellings to be developed and with sufficient service capacity available for such development	

Table 4.0 Compliance with Section 179a of the Planning and Development Act

It is submitted that this proposal lends itself to the proper planning and sustainable development of the area and complies with the development plan standards.



Kevin Hughes MIPI MRTPI
Director
For HPDC Ltd.