



STATEMENT OF CONSISTENCY & PLANNING REPORT RESIDENTIAL DEVELOPMENT

Lands located at Ballymakenny Road,
Drogheda Co. Louth

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 and planning report in support of a proposed housing development on behalf of, Louth County Council, for a residential development comprising 97 no. dwellings on lands situated at Ballymakenny Road, Drogheda Co. Louth. The proposed development, as per the description of development contained within the statutory planning notices, will consist of the following:

The construction of 97no. houses including 12no. 2-bed bungalows, 40no. two storey 2-bed houses, 30no. two storey 3-bed houses, 13no. two storey 4-bed houses, and 2no. 3-bed bungalows on a site of 3.03 hectares in the townland of Yellowbatter at Ballymakenny Road, Drogheda, Co Louth.

The development will also include the construction of a new entrance onto the Ballymakenny Road; provision of new cycleway, footpath, and public lighting along the Ballymakenny Road; new estate roads and homezones within the site; 120no. 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 tanks; 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. This report has been prepared in accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2017.

2.0 Site Location and Description

The subject site comprises an agricultural field 2.93 Ha in size and is located on the western side of the Ballymakenny Road, c. 1.9km north of Drogheda town centre. The field is bound to the north by an industrial bakery and play school, to the west and south by existing residential developments, and to the east by the Ballymakenny Road. The site is largely flat in its topography and contains no features of note.

The subject site is located adjacent to Ballymakenny College, a large secondary school with a capacity for over 1000 students, as well as 2 no. primary schools and a play school.

The Ballymakenny Road has undergone major upgrade works as part of the PANCR road development to the north of the site which will connect the northern environs of Drogheda with the M1 motorway. The road contains footpaths and cycle paths, connecting the subject site to Drogheda town centre.

The nearest bus stop is located 117 m to the southeast and is serviced by Bus Éireann route D4, providing access to Our Lady of Lourdes Hospital, the town centre, Drogheda Bus Station, and Mac Bride Train Station.



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 northeastern corner of the site

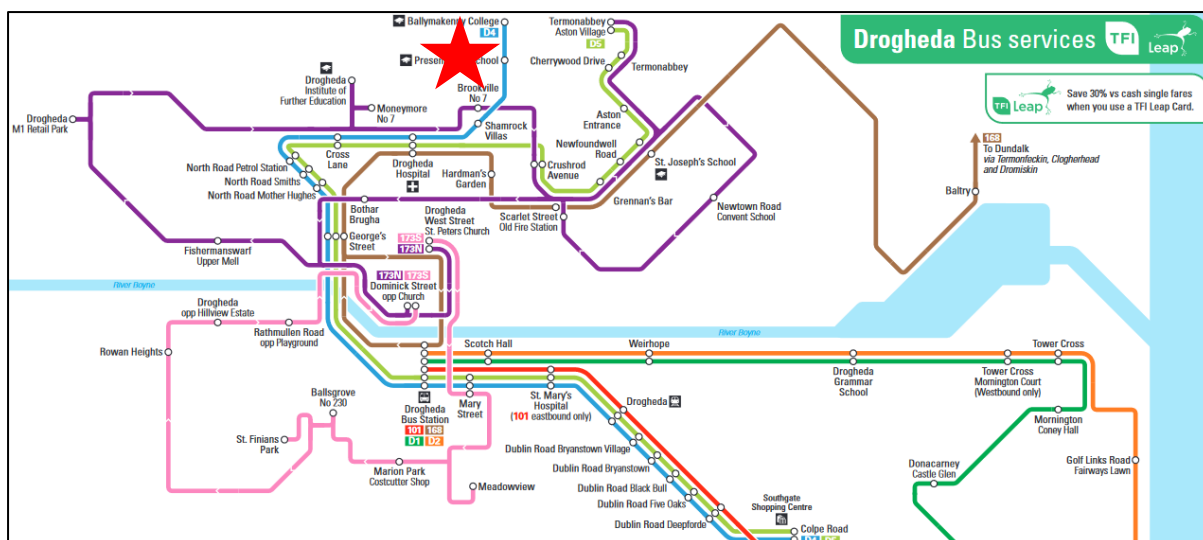


Figure 4.0 Bus network map of Drogheda with subject site highlighted (red star) on Route D4

3.0 Proposed Development

The proposed development consists of the construction of 97 no. dwellings comprising 52 no. 2-bed units, 32 no. 3-bed units, and 13 no. 4-bed units. Each house will be provided with 1 no. car parking space located on the adjoining street. Three dwellings will have on-curtilage parking. All houses will be provided with a rear back garden as well a privacy zone to the front of each dwelling.

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	12
B	2-bed, 4-person	40
C	3-bed, 5-person	22
D	3-bed, 5-person	8
E	4-bed, 7-person	4
F	4-bed, 7-person	9
G	3-bed, 5-person	2
TOTAL		97

Table 2.0 Proposed house types forming part of Phase 1

Public open space will be provided at 4 locations throughout the site, with each area being overlooked by adjacent dwellings. The central open space will contain a playground and all areas will be landscaped as per the accompanying Landscape Plan.

The development also provides for the provision of 1 no. new vehicular entrance from the Ballymakenny Road on the eastern boundary of the subject site. The proposed development also 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 5.0 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);
- Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009); 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 Drogheda, with all sites between the subject site and the town centre already developed along Ballymakenny Road.

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, which is one of Ireland's fastest-growing towns. The proposed location of the site will ensure that growth is contained within the metropolitan boundary, and will offer *'improved housing choice, transport mobility and quality of life.'*

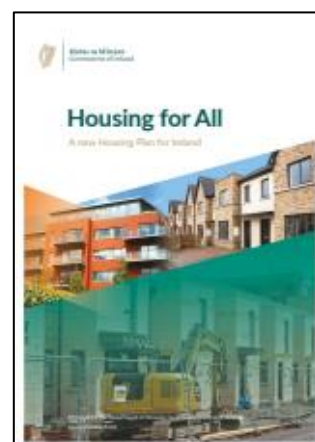
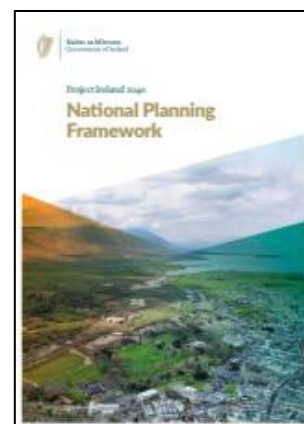
The proposed development is consistent with the above as it involves the development of underutilised land which is in close proximity to a number of public transport services. The proposed development complies with the relevant National Policy Objectives identified in the National Planning Framework.

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*

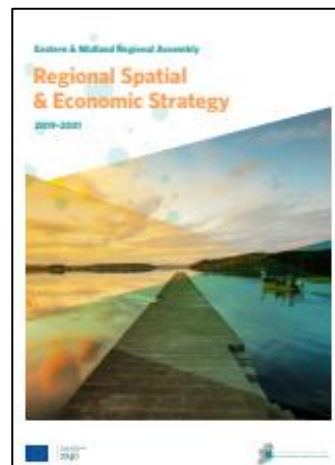


- *Addressing Vacancy and Efficient Use of Existing Stock.*

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 suburban 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's 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).



The RSES states that Drogheda is the fastest-growing town in the Country in the most recent inter-census period. Drogheda is identified as a Regional Growth Centre in the plan. Regional Growth Centres are defined as:

'Large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.'

The role of these Regional Growth Centres within the RSES is *'to serve as focal point to gain critical mass and to deliver positive impacts to their surrounding areas and enhance overall regional and national growth.'*

The RSES predicts that Drogheda will have a population of 50,000 by 2031 and will be a major economic centre in the region. The objective is to *'provide for the regeneration of the town centre, the compact planned and co-ordinated growth of the town's hinterland along with enhancing Drogheda's role as a self-sustaining strategic employment centre on the Dublin-Belfast Economic Corridor.'*

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 Drogheda moving forward.

The RSES requires a Joint Urban Area Plan (UAP) for Drogheda which Louth County Council and Meath County Council will be required to prepare following the adoption of the Regional Spatial & Economic Strategy. In tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework the joint UAP for the Regional Centre of Drogheda should endeavour to support and provide for the following:

- Provide for **sustainable, compact, sequential growth** and urban regeneration in the town core by promoting the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.
- Support the regeneration of the Westgate area of Drogheda's historic town centre to address vacancy and dereliction in the town core and as an alternative option to new development on green field sites.
- Facilitate the regeneration of lands at McBride Station to capitalise on existing and planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.
- Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.
- **Support the sustainable development of existing zoned lands in the northern and southern environs of the town** with a particular emphasis on the promotion of the IDA

Business Park as a location for economic investment and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs.

- *Support the implementation of the Urban Design Framework Plan for the Heritage Quarter.*

The absence of this Joint Urban Area Plan does not impede a decision being issued on an application for development within the Joint Urban Area Plan area in advance of this plan being prepared.

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



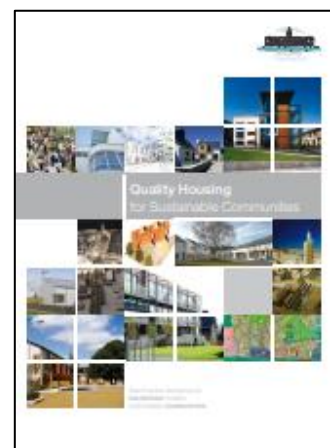
Figure 6.0 Aerial view showing no available land west of the Ballymakenny Road between the subject site and the town centre

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 1.9 kilometres of Drogheda 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 c 117m to the southeast of the site along Ballymakenny Road.

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:

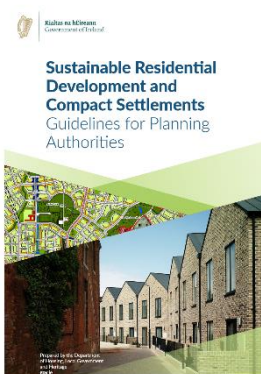
eml Type	House Type	Required GFA	Proposed GFA (SQ.M.)	Min. Living Room	Proposed Living Room	Min. Aggregate Living Area	Proposed Aggregate Living Area	Min. Aggregate Bedroom	Proposed Aggregate Bedroom	Min. Storage	Proposed Storage
A	2-bed, 3-person	60	64.5	13	27	28	27	20	21.2	3	3
B	2-bed, 4-person	80	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
D	3-bed, 5-person	92	106.4	13	15.8	34	34.4	32	34.3	5	9.9
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
H	5-bed, 4-person + carer	N/A	225.9	N/A	19.4	N/A	45.4	N/A	65.7	N/A	15.2

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 pertaining to the planning and development of urban and rural settlements.



As a Regional Growth Centre, the guidelines list the following key priorities in order of priority are:

- (a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Regional Growth Centre to smaller towns and villages and rural areas in the hinterland,
- (b) strengthen town centres,
- (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,
- (d) realise opportunities for adaptation and reuse of existing buildings and for backland, brownfield and infill development,
- (e) deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the town, and
- (f) deliver sequential and sustainable urban extension at suitable 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.

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 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 7.0 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.

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 Drogheda is included within the core area of Louth County. The plan states that there is a:

'Focus on driving investment in services, employment growth and infrastructure while balancing housing delivery, including consolidation of the core areas and delivery of compact growth.'

More specifically, the County Development makes specific reference to the application land zone:

'as part of the preparation of the Joint Local Area Plan for Drogheda a review of lands zoned A2 New Residential in the Northern Environs area will be carried out and a phasing strategy will be set out. This will take account of the designation of Drogheda as a Regional Growth Centre in national and regional policy, the housing allocation for Drogheda in the Core Strategy, the availability of transport infrastructure and water services, and ensuring the Northern Environs retains its potential to function as a counterbalance to the Southern Environs of the town.'

The purpose of this is to ensure that there is sufficient land available to facilitate the anticipated population growth of Drogheda.

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.

Ballymakenny Road is located in Drogheda and is less than 2 km from the town centre. The town centre, bus station and train station are all accessible via bus. The subject site is located amongst 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 amongst developed lands 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.

The northern environs of Drogheda are undergoing major change with new road infrastructure, schools and amenities either already developed or in the process of being developed.

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.

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.

The proposed development will add additional housing to an area of Drogheda that has been earmarked for growth. This is emphasised by the opening of Ballymakenny College, and the construction of the PANCR road.

Policy Objective	
CS 8	In order to ensure consistency with the Core Strategy housing allocation as set out in the County Development Plan, as part of the preparation of the Joint Local Area Plan for Drogheda a review of lands zoned A2 New Residential in the Northern Environs area will be carried out and a phasing strategy will be set out. This will take account of the designation of Drogheda as a Regional Growth Centre in national and regional policy, the housing allocation for Drogheda in the Core Strategy, the availability of transport infrastructure and water services, and ensuring the Northern Environs retains its potential to function as a counter balance to the Southern Environs of the town.

The Joint Local Area Plan is currently in the pre-draft stages. The subject site is currently zoned A2 New Residential in the county development plan. The development of the subject site is consistent with the above policy.

Policy Objective

CS 10	Direct and consolidate the majority of the County's future population growth into the strong and dynamic Regional Growth Centres of Drogheda and Dundalk in line with the objectives of the Regional Spatial and Economic Strategy and in accordance with the Core and Settlement Strategies of the Development Plan.
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The proposed development seeks to provide 97 no. dwellings in Drogheda and complies with Policy Objective CS10.

Policy Objective

CS 11	Support the Regional Growth Centres of Drogheda and Dundalk as regional economic drivers targeted to grow to city scale with a population of 50,000 by 2031 and capitalise on their strategic location on the Dublin-Belfast Economic Corridor.
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The proposed development allows for continued growth and adds additional population capacity to Drogheda and complies with Policy Objective CS11.

Policy Objective

SS 1	To support the role of Drogheda as a Regional Growth Centre and a driver of growth along the Dublin-Belfast Economic Corridor and to facilitate the continued expansion and growth of the town based on the principles of balanced, sustainable development that enables the creation of employment, supports economic investment, and creates an attractive living and working environment.
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The proposed development allows for continued growth of Drogheda within the Dublin-Belfast Economic Corridor and complies with Policy Objective SS1.

Policy Objective

SS 2	To continue to support and promote the economic role of Drogheda as a regional centre of employment along the Dublin-Belfast Economic Corridor and to facilitate any infrastructural investment or employment generating sustainable development that will strengthen the role of the town and maintain its competitiveness.
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The proposed development allows for continued growth of Drogheda within the Dublin-Belfast Economic Corridor and complies with Policy Objective SS2.

Policy Objective

SS 10	To manage the growth of Drogheda in a manner that will achieve the creation of a compact settlement with attractive and inclusive sustainable neighbourhoods where there is a choice of affordable homes for all.
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The subject site is located on a main route into Drogheda and is serviced by frequent bus services. The subject site is surrounded by residential development and the use of the site to provide residential accommodation adheres to the principles of sequential development. This complies with Policy Objective SS10.

Policy Objective

SS 11	To support the coordinated development of the Northern Environs of Drogheda with the provision and delivery of sustainable social and community facilities and infrastructure in tandem with residential development.
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This development is being provided at a time when the nearby schools have been completed and opened, and the first section of the PANCR road has been opened, thus providing the area with the necessary infrastructure to support residential development. This complies with Policy Objective SS11.

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. Ballymakenny Road 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 33 dwellings per hectare, slightly lower than the development plan requirement of 35 dwellings per hectare. This is not considered a material contravention of Policy Objective HOU15. It is important to note the inclusion of large, bespoke UD bungalows (Type G), which is a constraint when trying to achieve the units/ha figure. This development includes a high number of larger family homes which are ideally located next to nearby schools.

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.
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The proposed residential development is located along a bus route providing services to the town centre, bus station and train station. 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 Ballymakenny Road footpaths and cycle paths. There are strong public transport routes along Ballymakenny Road. 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.

Public open space has been provided at 4 locations 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.

The scheme provides a mix of dwellings types including 52 no. two bed (53% of scheme) (12 of which are single storey), 32 no. 3-bed (32% of scheme), and 13 no. 4 bed units (13.4% 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.

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.

The scheme provides 97 no. dwellings and therefore is exempt from providing 1% single storey units. Nonetheless, the scheme provides for 12% 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.

The scheme has been designed having regard to the contextual location of the site. It provides for 97 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.

The scheme provides 27% universally designed units. This is below the requirement of 30%, however it is considered that this is not a material contravention of the development plan.

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.
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A Social Infrastructure Audit has been prepared by Thorton O'Connor Town Planning and submitted under a separate leaf. The proposed development does not provide a creche despite comprising more than 75 no. dwellings. This has been addressed in the Social Audits which states:

As stated previously in Section 2.0, the Childcare Facility Guidelines for Planning Authorities (2001) recommend that a crèche or childcare facility with capacity for 20 No. children should generally be provided for every 75 No. dwellings within new residential developments. However, both the Guidelines and Louth County Council further advise in their LCDP 2021-2027 that this provision should have regard to the guidelines, but the Council will take account of existing childcare provision when considering the delivery of new facilities as part of residential development in order to avoid over provision.

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.
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The proposed development comprises 97 no. dwellings and is below the threshold. Nonetheless, a playground will be provided.

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.
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The proposed development will not provide a creche due to the number of creches in the immediate vicinity. Chapter 4.11 of the development notes that *the Council will take account of existing childcare*

provisions when considering the delivery of new facilities as part of residential development in order to avoid over-provision. 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 Ballymakenny Road which is served by Bus Éireann route D4. This provides access to the town centre, train station and bus station. The proposed density is in keeping with the established pattern of development in the immediate area which averages at 33 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, 27% 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 Ballymakenny Road which is served by Bus Éireann route D4. This provides access to the town centre, train station and bus station. The site is also accessible via footpaths and cycle paths on the Ballymakenny Road. 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. Invasive species were discovered on-site and the report presents an eradication plan. 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 proposed development will result in the removal of existing hedgerows along the western boundary of the site. It is noted that the hedgerows along the boundaries are not intact. Upon review of the proposed site plan and development plan standards, it is necessary to remove the hedgerow to facilitate the housing development and allow for future connections to neighbouring developments, increasing permeability. It is noted that the development plan allows for hedgerow removal in certain circumstances as noted in Policy Objective NBG31 which states:

Policy Objective	
NBG 31	Where in exceptional circumstances, trees and or hedgerows are required to be removed in order to facilitate development, this shall be done outside nesting season and there shall be a requirement that each tree felled is replaced at a ratio of 10:1 with native species and each hedgerow removed is to be replaced with a native species. In Drogheda and Dundalk, replacement trees will be required at a ratio of 5:1 where the removal of trees is required in order to facilitate development.

The hedgerow contains up to 15 trees. The propose landscape plan prepared by Ait Urbanism proposes to plant 97 no. native species trees across the subject site in compliance with the 5:1 ratio in Policy Objective NBG31.

It is submitted that the proposed removal of hedgerow and the proposed landscape plan comply with the development plan.

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 2 main towns of Dundalk and Drogheda, which are 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				

Figure 8.0 Table 13.3 from the Louth County Development Plan 2021-2027 displaying appropriate density and plot ratio

The recommended minimum density is 35 units per hectare and plot ratio is 1. This development will provide a density of 33 units per hectare. The density is slightly lower than the recommended minimum of 35 dwellings per hectare due to the proportion of single-storey buildings provided to assist rightsizing and age-friendly homes which in turn offers a strong demographic mix; the provision of larger family homes in an area close to schools; and the space provisions allowed within the design for possible future links to adjoining developments to promote active travel and permeability.

It is noted by Louth County Council that this development delivers much-needed 3 and 4-bedroom dwellings to cater for families on the housing list as well as the large, bespoke Universally Designed bungalows (Type G). Such housing stock is low in Louth.

The plot ratio is 0.3 and complies with Table 13.3.

It is submitted that 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. While majority of the houses is provided with a rear back garden all of which exceed the minimum requirements listed below, 14 no. gardens fall marginally below CDP requirement (by between 1-3sqm) due to site shape/constraints. We note that all gardens well exceed the Compact Settlements figures.

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

Figure 9.0 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 52 no. two bed (53% of scheme) (12 of which are single storey), 32 no. 3-bed (32% of scheme), and 13 no. 4 bed units (13.4% 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 97 no. dwellings and therefore is exempt from providing 1% single-storey units. Nonetheless, the scheme provides for 12% of the scheme as single-storey units.

The scheme has been designed having regard to the contextual location of the site. It provides for 97 no. dwellings in a range of sizes that will encourage sustainable development.

The scheme provides 27% universally designed units. This is below the requirement of 30%, however, it is considered that this is not a material contravention of the development plan.

The proposed dwelling mix is largely in compliance 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 10.0 Car 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 97 no. spaces for 97 no. dwellings. The car parking is in accordance with the County Development Plan 2021-2027 as there are 120 no. spaces provided. In terms of cycle parking, the development plan notes that 1 cycle space is

provided for each residential unit. This has been achieved. No. 24 visitor spaces are also provided. This complies with the development plan.

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 100% ducting and 20% installed EV charging spaces. This complies with 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 6 %. This complies with Section 13.16.7 of the development plan.

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 11.0 Bicycle Parking requirements as per the Louth County Development Plan 2021-2027

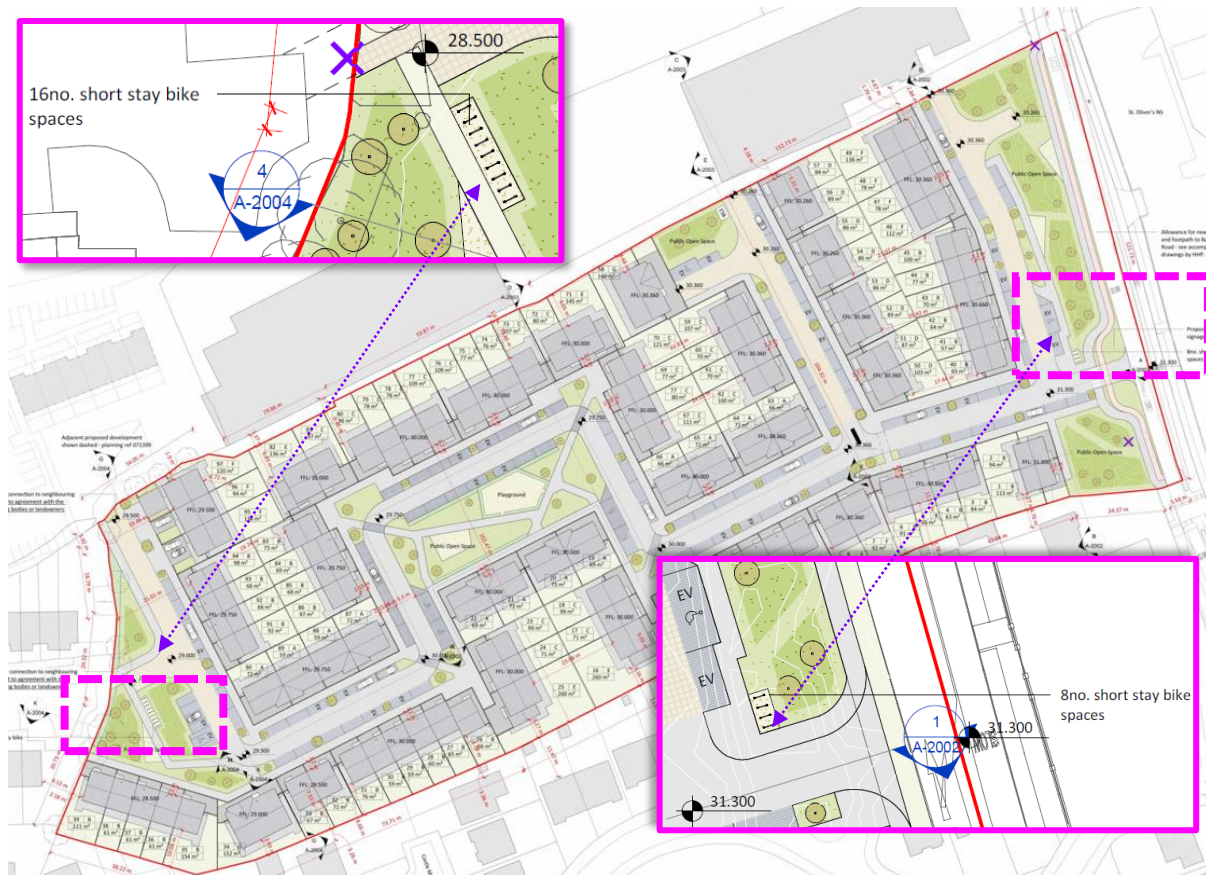


Figure 12.0 Bicycle Parking spaces within the proposed development.

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 4257 sq.m of public open space which equates to 14.5% of the site area, slightly below the required quantum.

The development plan allows for flexibility stating:

In developments where the standard of the open space is of a high quality due to its location, functionality and any additional detailing proposed e.g. paving, landscaping or surfaced play areas and equipment, a reduced rate of open space may be acceptable. Such a reduction will be assessed on a case-by-case basis.

The proposed open space provides a playground and is generally designed to a high spec. This complies with section 13.8.15 of the development plan. Please refer to the Landscape Plan and Design Report prepared by Áit Urbanism and Landscape for further details.

Furthermore, 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:

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.

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 will be provided in the form of tree pits throughout the site as per the Landscape Plan. 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

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, which encourages the growth of Drogheda as a key Regional Growth Centre. In this regard, it is highlighted that the proposed residential development will provide additional accommodation to serve the growing population of the town.

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 Drogheda town centre. The subject site is located within close proximity to Drogheda 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 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.



Kevin Hughes MIPI MRTPI
Director
For HPDC Ltd.