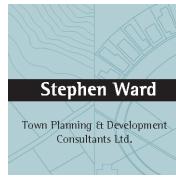
LRD Planning Application – Modification to SHD Permission ABP-311678-21 Statement of Consistency

Old Slane Road, Mell/Tullyallen, Drogheda, Co.Louth



Prepared on behalf of Lagan Homes Tullyallen Ltd



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1.0 INTRODUCTION

Lagan Homes Tullyallen Ltd has appointed Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House, Jocelyn Street, Dundalk, Co. Louth to prepare this statement to accompany an LRD Planning Application under Section 32A Planning and Development Act 2000 (as amended) for modifications to permitted Strategic Housing Development (SHD) permission (ABP-311678-21).

Planning permission was granted for the permitted SHD (ABP-311678-21) on the 9th of February 2022 subject to 33no. conditions. The Board Order Conclusions on Proper Planning and Sustainable Development states;

"Having regard to the zoning objective for the site as set out in the Louth County Development Plan 2021-2017, the pattern of existing development in the immediate vicinity of the site, the Natura impact statement submitted with the application and subsequent Appropriate Assessment in the Inspectors Report, the infill site location in Drogheda a regionally important larger settlement in the Regional Spatial and Economic Strategy where significant growth is targeted, and the sites location a reasonable walking distance to the amenities and a bus stop at the M1 retail park, it is considered that the proposed development would not seriously injure the residential or visual amenities, including historical and archaeological assets in the area or of property of land in the vicinity, would be consistent with national and local planning policy and would be acceptable in terms of design, scale, height, mix and quantum of development, and in terms of pedestrian and traffic safety. It was also concluded that the development would not subject future occupiers to flood risk or increase the risk of flood elsewhere. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area."

Construction has commenced on the first 30no. dwellings units permitted under SHD Ref. ABP-311678-12 as modified by planning permission P.A. Ref. 2360368. The approved naming for the development is Gort Mell. The proposed LRD planning application will seek to modify 207no. units within the permitted development with a site area of 4.8ha as illustrated by the red line boundary on figure 1.

In accordance with Section 34(3C) of the Planning and Development Act 2000 (as amended), the planning authority is restricted in its determination of this application to modify the permitted SHD by way of an LRD application to only considering the modifications proposed to the previously permitted development. As such this Statement of Consistency is restricted to the consideration of the modifications in terms of their consistency with planning policy at a national, regional and local level.

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The application site remains zoned A2 New Residential Zone 1 – To provide for new residential neighbourhoods and supporting community facilities. The publication of the 'Sustainable and Compact Settlement Guidelines' (January 2024) is a change to the planning policy base that applies to the site. Otherwise planning policy is broadly the same as applied to the assessment of the permitted scheme. Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines. Accordingly, where SPPRs are stated, they take precedence over any conflicting policies and objectives of development plans. The proposed modifications contained in this LRD planning application apply the SPPRs stated in the Section 28 Sustainable and Compact Settlement Guidelines (January 2024).

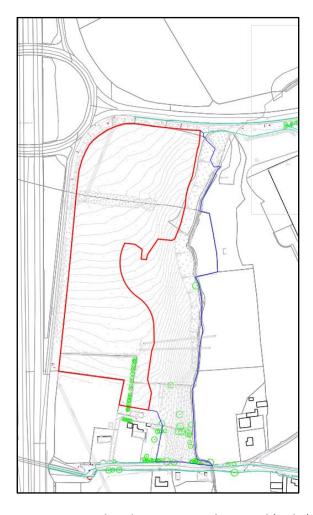


Figure 1: Proposed application site outline in red (4.8ha)

2.0 SITE CONTEXT

The site of the permitted SHD is located in the north-western part of Drogheda in the townlands of Mell and Tullyallen. The SHD site is bound by the M1 Motorway and Junction 10 slip road to the west and North West and the R168 to the north. The site meets the Old Slane Road to the south while the eastern boundary is demarcated by a stream locally known as Kenny's Stream and named by the EPA as Mell Stream. The Old Slane Road is largely residential in character but also features two commercial premises and a GAA pitch. The M1 Retail Park is to the north east of the site which serves as a neighbourhood centre with cafes, leisure uses (gym and swimming pool), supermarket and comparison shopping. The retail park has planning permission to be extended under P.A.Ref. 22-954. The Retail Park is served by regular public bus routes to the town centre and regional services. There is an Aldi supermarket at the junction of Old Slane Road and the R168 in Mell (Leonards Cross). A large primary school is located c. 1.7km from the southern boundary of the application site and a new special school has recently been granted planning permission on Cement Road less than 2km distance from the southern boundary. Please see Appendix C of this statement for an audit of community facilities and services in proximity to the application site.

2.1 APPLICATION SITE

The gross area of the permitted SHD is 8.73hectares. This gross figure included lands outside the main development area in the control of Louth County Council and Meath County Council that were included with the original SHD planning application in order to provide for full footpath connectivity along the Old Slane Road east to Leonards Cross and the town centre and to the south of the R168 east to join to the existing footpath network and the M1 Retail Park. There will be no change to these permitted works as part of the proposed modifications. These lands do not form part of the LRD planning application site.

The development area of the permitted SHD is 7.4ha. Excluding the riparian corridor and permitted pumping station, the net site area is 6.16ha. The area of the SHD site affected by the proposed modifications extends to 4.8ha. The balance of the permitted SHD shown within the blue line consists of 30no. dwellings under construction, the main entrance and vehicular access road, public open space and a riparian buffer zone of 20m from the bank of the Mell Stream (1.013ha). Land ownership extends to the east of Mell Stream. These lands do not form part of the permitted SHD.

The application site and adjoining lands are zoned A2 – New Residential Phase 1 by the Louth County Development Plan 2021-2027 (as amended).

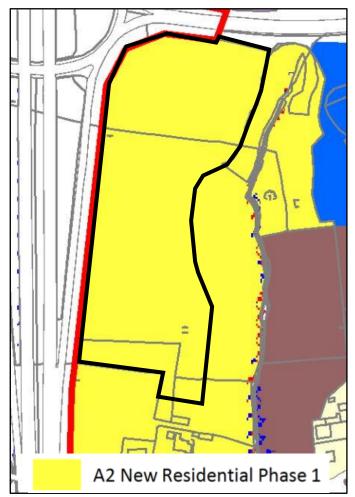


Figure 2: Approximate LRD application site outlined in black

2.2 SITE BOUNDARIES

The application site is bound to the west by the M1 south bound slip road from the N52/R168 junction and associated infrastructure. The western site boundary is marked by the mature planting along the M1 slip road consisting of semi-mature trees planted as a shelterbelt between the site fence line. Inside the site fence there is hawthorn. The northern boundary is bound by the R168 with an agricultural entrance gate providing access to the application site. The site boundary to the north features a hedgerow similar to the western boundary with Hawthorn, Common Hazel, Gorse, Field Maple, Silver Birch, Blackberry/bramble and Goat Willow/Great Sallow (please see survey by Charles McCorkell under separate cover for further details).

To the south of the site are two existing residential properties which front onto the Old Slane Road. The south western boundary does not have clearly defined physical boundary but is marked with a fence.



Plate 1: Northern Boundary



Plate 2: North west Corner opposite M1 junction



Plate 3: View south from the agricultural entrance on Plate 4: View of M1 interchange junction from the northern site boundary



northern boundary.

3.0 MODIFICATIONS TO THE PREVIOUSLY PERMITTED DEVELOPMENT

The subject LRD planning application seeks modifications to the permitted SHD (APB-311678-21, as amended under P.A. Ref. 2360368) that will change the mix of housing from 237no. dwellings units including 147no. apartments and 90no. houses, to 237no dwellings consisting of 42no. apartments and 195no. houses with associated modifications to the road layout and distribution of public open space, car parking site services and site development works. A crèche was permitted as part of the original SHD. A crèche remains part of the proposed development but has been redesigned as a standalone building to be provided in Phase 1.

Table 1: Permitted (SHD ABP-311678-21 as modified by P.A.Ref. 2360368)					
	Housing	Duplex / Simplex	Multi-Level Apartments	Total	
1-bed	-	-	19	19	8%
2-bed	1	15	80	96	41%
3-bed	76	21	12	109	46%
4-bed	13	-	-	13	5%
Total	90	36	111	237	100%

	Table 2: SHD with Proposed modifications			
	Housing	Duplex / Simplex	Total	
1-bed	-	21	21	9%
2-bed	28	21	49	21%
3-bed	142	-	142	60%
4-bed	25	-	25	10%
Total	195	42	237	100%

PROPOSED MODIFICATIONS

30no. of the permitted dwellings are under construction. The balance of 207no. dwellings in the permitted development currently have the following mix-

	Tab	Table 3: Permitted Development within the application site			
	Housing	using Duplex/Simplex Multi-Level Apartments Total			
1-bed	-	-	19	19	
2-bed	1	15	80	96	
3-bed	49	21	12	82	
4-bed	10	-	-	10	
Total	60	36	111	207	





Plates 5& 6: Permitted Housing under Construction

The modifications proposed including the removal of two apartment buildings to the north of the site will change the mix and dwelling format as follows-

Table 4: Proposed modifications within the application site			
	Housing	Duplex / Simplex	Total
1-bed	-	21	21
2-bed	28	21	49
3-bed	115	-	115
4-bed	22	-	22
Total	165	42	207

4.0 JUSTIFICATION FOR PROPOSED MODIFICATIONS

The publication of the Section 28 Guidelines on Sustainable and Compact Settlement Guidelines for Planning Authorities has provided an opportunity to modify the permitted SHD to provide a fully 'own door' medium density residential development. As detailed in the Architectural Design Statement prepared by project architects JFOC Architects, the permitted scheme had a number of strengths but resulted in an imbalance in density with tall higher density apartment buildings located to the north of the site and low density housing on the balance of the site. By taking the new policy approach, the same number of residential units can be provided but with an even density distribution across the site.

It is recognised that the permitted layout was partly determined by the acoustic strategy to mitigate noise from the M1 motorway. This resulted in a large area of the site along the western boundary being used to provide a berm and noise wall. The new acoustic strategy uses the built form to mitigate noise intrusion into the site. Houses along the western boundary (Type O) have been specifically designed for this objective and so have been subject to rigorous and detailed design and analysis to ensure they can function both as an acoustic barrier and provide a high level of residential amenity to future residents who will live in these houses. Please refer to the Acoustic Design Statement by Amplitude Acoustics and the Residential Amenity Report by Stephen Ward Town Planning & Development Consultants Ltd under separate cover for further details.

5.0 CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

The permitted SHD was assessed in accordance with the following National and Regional planning Policies (Section 6.1 of the Inspectors Report).

- Project Ireland 2040 National Planning Framework
- The Regional Social and Economic Strategy for the Eastern and Midlands Region 2019-2031 (RSES)

The principle of residential development is established by the permitted SHD. The proposed modifications are in line with the Section 28 Guidelines for Sustainable and Compact Settlements (January 2024) which provides a clear direction for how sustainable residential density is to be achieved. As such, the development will continue to comply with national and regional planning policies.

6.0 CONSISTENCY WITH SECTION 28 GUIDELINES

This Statement of Consistency provides an assessment of the proposed development and consistency with the following Section 28 Guidelines-

- Sustainable and Compact Settlements Guidelines for Planning Authorities (January 2024),
- The Sustainable Urban Housing Design Standards for New Apartments (2023),
- The Urban Development and Building Height Guidelines (2018),
- Design Manual for Urban Roads and Streets (DMURS),
- Childcare Facilities Guidelines for Planning Authorities (2001).

The permitted SHD was assessed by An Bord Pleanála in accordance with Section 28 Ministerial Guidelines. The permitted SHD as modified will continue to comply with the above Guidelines in terms of providing compact residential development at a sustainable density within a designated growth centre. This section of the statement will consider the modifications proposed in terms of the Guidelines on Sustainable and Compact Development (2024), the Urban Development and Building Height Guidelines (2018) and the development management criteria contained in the Sustainable Urban Housing: Design Standards for Apartments (2023). The proposed changes to the childcare facility to be provided on site are addressed in more detail within the Childcare Demand Assessment by Stephen Ward Town Planning and Development Consultants Ltd under separate cover.

6.1 SUSTAINABLE AND COMPACT SETTLEMENTS - GUIDELINES FOR PLANNING AUTHORITIES (JANUARY 2024)

The Guidelines on Sustainable and Compact Settlements took affect from their publication on the 15th of January 2024. The Guidelines highlight a greater need for accelerated supply of more diverse and affordable housing since the publication of the Sustainable Residential Development Guidelines and expands on the density ranges contained in the 2009 Guidelines. In keeping with national planning policy, the application of the appropriate density is to be considered based on proximity and accessibility to urban services and the need to protect the character and amenities of the local area. The general approach is that densities at the upper end of the range are applied and the most central most accessible locations.

6.1.1 DENSITY

Drogheda is identified as a 'Regional Growth Centres' by the NPF and RSES and as described at section 3.3.2 of the Guidelines. The density ranges for these locations are as follows;

- Densities of 50-150 dwellings per hectare in centre and urban neighbourhoods and
- Densities of 35-50 dwellings per hectare in suburban/urban extension areas.

Suburban areas are described by the Guidelines as "the low density car-orientated residential areas constructed at the edge of the town" (Table 3.4). It is a policy and objective of these Guidelines that residential densities in the range 35 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Regional Growth Centres (para. 3.3.2, (ii)).

The proposed development will maintain the permitted density of 39dph. This density reflects the site's position at the edge of a regional growth centre but supported with nearby services including the M1 retail park, St. Joseph's primary school in Mell and sports facilities. The effect of the modifications is to distribute the density more evenly across the site and facilitate a much higher level of own-door housing which is a key aim of the Guidelines.

6.1.2 POLICY AND OBJECTIVES

This section of the Statement outlines the Policy and Objectives contained in the Sustainable and Compact Settlements Guidelines (2024).

Policy and Objective 3.1

It is a policy and Objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.

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As detailed above, the modifications to the permitted SHD will be in keeping with the recommendations of the Guidelines providing a medium density own-door development representing 39dph.

Policy and Objective 4.1

It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality design and placemaking.

Waterman Moylan Consulting Engineers has designed the site layout to serve the proposed housing in compliance with DMURS. Both the Engineering Assessment Report and Traffic and Transport Assessment prepared by Waterman Moylan and submitted under separate cover outline the specific design features that have been incorporated within the proposed scheme in compliance with DMURS.

Policy and Objective 4.2

It is a policy and objective of these Guidelines that the key indicators of quality design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.

Section 4.4 is titled Key Indicators of Quality Design and Placemaking and contains five subsections. The permitted SHD with modifications in place has been assessed below with regard to each of these key indicators to demonstrate it will provide a high quality residential environment.

(i) Sustainable and Efficient Movement

According to the Guidelines, in order to meet the targets set out in the National Sustainable Mobility Policy 2022 for reduced private car travel and increased active travel, it will be necessary to design settlements at every level to support the transition away from private car use and to support ease of movement for pedestrians, cyclists and public transport.

The permitted development provides connections along Old Slane Road towards a supermarket (Aldi), a primary school and town centre while the new pedestrian/cycle connection along the R168 provides easy access to the M1 Retail Park which functions as a district centre containing a supermarket, gym, café and comparison shopping. Pedestrians/cyclists will have a shorter journey to the retail park than the private car where there is access to town and regional bus services. There is a continuous link for pedestrians and cyclists through the site along the eastern public open space. We note that the Retail Park is affected by zoning objective B3-Retail Park and that there is also a District Centre zoning in Mell where an application for a neighbourhood development has recently been permitted (P.A. Ref. 22-954).

The modifications to the site layout plan provide a permeable and legible urban environment that is easy to navigate. Traffic calming measures such as reduced carriageway widths will create street networks that feel safe for pedestrians and cyclists. The proposal aligns with best practice guidance outlined in DMURS. A hierarchy of streets is proposed with primary and secondary streets and shared surfaces. Car parking has been designed so that the majority is contained between buildings by altering the building line or providing tandem parking and courtyards. Please refer to Landscape Design Statement by NMP Landscape Architects for further details of typical streetscapes and shared surface detailing.

(ii) Mix and Distribution of Uses

At a community level, the Guidelines require a diverse mix of housing and variety in residential densities across settlements. This includes a focus on the delivery of innovative housing types and can facilitate compact growth and provide greater housing choice.

The proposed development seeks to modify a permitted SHD on residentially zoned lands. The design of the new house types is innovative and will be constructed with high quality materials. The adaption of the permitted SHD to take account of the Section 28 Guidelines on Compact Settlements will enable a greater range and variety of housing instead of multilevel apartments.

(iii) Green and Blue Infrastructure

According to the Guidelines, Green and Blue Infrastructure (GBI) is a strategically planned network of natural and semi-natural areas designed and managed to deliver a wide range of ecosystem services, while also enhancing biodiversity. GBI includes features such as rivers and canals, coastline, greenspaces (including parks), Nature-based Solutions and amenity sites that deliver ecosystem services and contribute to healthy, low carbon, resilient and connected settlements and places. National Planning Objective 58 of the NPF requires integrated planning for Green Infrastructure and ecosystem services as part of the preparation of statutory land use plans.

The Mell Stream which flows along the site's eastern boundary will be protected and enhanced as per the permitted development which includes a 20m riparian corridor and mitigating measures as prescribed by an NIS. The public open space to the east of the application site responds to this existing natural feature following the curve of the stream and opening up views for enhanced amenity value.

(iv) Public Open Space

It is recommended by the Guidelines that all statutory development plans should include a strategy for the provision of an integrated hierarchy of public open spaces and corridors across the plan area to meet the needs of the planned population. The public open space strategy in the development plan should include objectives for the provision of regional, district and local level parks and greenways.

According to the Guidelines, public open space provided as part of new development proposals should be designed to retain and protect natural features and habitats of importance within the site and to maximise biodiversity gain. They should also form an integral part of the overall design (p.46)

Policy and Objective 5.1 in Chapter 5 requires proposals for new residential development include areas of functional public open space that collectively equate to not less than a minimum of 10% of the net site area and not more than a minimum of 15% of the net site area save in exceptional circumstances. The permitted SHD as modified would provide 15% of the full SHD site as public open space. As outlined by the landscape strategy prepared by NMP Landscape Architects, all housing will have a usable area of public open space within walking distance of their home (see section 3.4 of the Landscape Design Statement for details). As stated above, the calculation of public open space does not include the 20m riparian corridor protecting the Mell Stream (1.013ha).

(v) Responsive Built Form

The Guidelines state "Built form refers to the layout, position and composition of buildings and to how buildings address streets and open spaces."

As detailed by the Architectural Design statement under separate cover, the built form has been used to achieve a high quality pedestrian realm by allowing houses to define the street line and hiding cars from view by staggering the building line. Passive surveillance of the public ream is continuous throughout the development using urban blocks that turn the corner and avoid blank gables. In order to maintain a presence to the R168, three storey duplex blocks are positioned along the northern boundary.



Figure 3: CGI of House Type M

6.1.3 DEVELOPMENT STANDARDS

Section 5 of the Guidelines contains 'Development Standards for Housing'. According to the Guidelines, "the continued application of suburban housing standards originally conceived during the 20th century is hampering innovation in the housing sector in Ireland" (p.52). Key design principles of the Guidelines include reduced plot sizes and a tighter arrangement of houses compared to suburban housing, narrower streets and smaller street setbacks, reduced car parking ratios and distribution of private open space in the form of patio gardens and/or upper level terraces and balconies for houses (para. 5.2). The Guidelines state, "it is Government policy to support medium density 'own door' housing models in Ireland, alongside traditional housing and apartment developments" (p.52).

The proposed development seeks to reflect the new direction in housing policy by providing a medium density own door development. The following SPPRs contained within the Section 28 Guidelines have been applied.

In accordance with the provisions of Section 34 of the Planning and Development Act 2000 (as amended) the planning authority when making its decision in relation to an application is required to apply any specific planning policy requirements (SPPRs).

SPPR1 - Separation Distances - Summary

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

The permitted development maintained the status quo of 22m separation distances. The proposed modifications apply reduced separation distances of 16m for houses with directly opposing first floor windows and 14m where there are no directly opposing first floor windows.

SPPR 2 - Minimum Private Open Space Standards for Houses-

• 1-bed house 20sq.m

• 2-bed house 30sq.m

• 3-bed house 40sq.m

• 4-bed+ house 50sq.m

The proposed modifications to the permitted SHD apply the new standards of private open space for houses required by SPPR2. In this regard the average private open space for houses proposed exceeds the SPPR 2 'minimums' and is as follows-

• 2-bed house 40sq.m

3-bed house 55sq.m

• 4-bed house 71sq.m

A full schedule of all private open space areas has been prepared by JFOC Architects and is attached an appendix D of this statement. All private gardens have been assessed with regard to access to sunlight with an overall pass rate of 80% for the total private open space area and 95% when compared against the minimum area required for each dwelling.

SPPR 3 – Car Parking – (**iii**) In intermediate and peripheral locations, the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2no. spaces per dwelling.

The amended site layout plan provides 1no. car parking space for each 2-bedroom house and 2no. car parking spaces for each house with three or more bedrooms. Car parking for apartments complies with the guidelines for New Apartment Design (2023).

SPPR 4 – Cycle Parking – in the case of residential units that do not have ground level open space or have smaller terraces, a general minim standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Provision should also be made for a mix of bicycle parking types.

All houses have ground floor level open space to store bicycles. Grouped bicycle storage units are provided for in the duplex apartments. The quantity of cycle spaces is in accordance with the design guidelines for New Apartments. Please refer to JFOC drawing no. 22.127.PD7001 to 22.127.PD7004 for details of bicycle storage structures.

6.1.4 QUALITY DESIGN AND QUALITY PLACEMAKING

The Guidelines contains a Design Checklist at Appendix D that provides questions that should be used in the refinement and review of details plans and the consideration of individual planning applications and assists in the application of Section 4.4 Key Indicators of Quality Design and Placemaking. The checklist has been completed for the modifications proposed to the permitted SHD and is contained at Appendix A of this statement.

6.2 SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS (2023)

The publication of these Guidelines under Section 28 of the Planning and Development Act 2000 (as amended), serves to reinforce and assist in the achievement of the policies and objectives of the National Planning Framework. The Guidelines were amended in 2023 to introduce Transitional Arrangements for Build-to-Rent developments. The Required Minimum Floor Areas and Standards set out at Appendix 1 of the Guidelines have not been amended.

6.2.1 LOCATION

According to the Guidelines, the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors. The Guidelines note that the range of locations identified is not exhaustive and that, while not necessarily required at densities below 45 units/Ha, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density. Accordingly, apartments may be considered as part of mix of housing types for developments in any given urban location, including suburbs, towns and villages (para. 2.5).

Having regard to paragraph 2.4 of the Guidelines, the application site can be regarded as a "Peripheral and/or Less Accessible Urban Location". According to the Guidelines, "Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net) including:

- Sites in suburban development areas that do not meet proximity or accessibility criteria;
- Sites in small towns or villages.

The permitted SHD as modified by P.A. Ref. 2360368 contains 147no. apartments. The proposed modifications will replace the majority of apartments with housing, switching the mix within the SHD site from 147no. apartments and 90no. houses to 195no. houses and 42no. apartments.

The mix within the application site will change from 60no. houses and 147no. apartments to 165no. houses and 42no. apartments. Apartments as proposed will be own door duplex units—21no. 1-bed ground floor simplex units and 21no. duplex 2-bed units. This approach is in keeping with the Guidelines to allow for greater diversity and flexibility in a housing scheme by including apartments without them being the dominant dwelling type.

6.2.2 IDENTIFIED NEED

The Guidelines highlight that according to Census 2016, when the number of 1-2 person dwellings is compared to the number of 1-2 person households, there is a deficit of approximately 150% i.e. there are approximately two and a half times as many 1-2 person households as there are 1-2 person homes (pars. 2.6).

The proposed modifications will increase the variety of housing available within the permitted SHD, particularly smaller houses as an alternative to apartments. In keeping with the Guidelines on Sustainable and Compact Settlements, this approach provides choice to smaller households, bridging the gap between larger family homes and apartments.

6.2.3 APARTMENT MINIMUM FLOOR AREAS AND DESIGN STANDARDS

The 'Apartment Guidelines' establish minimum Apartment Floor Areas under Specific Planning Policy Requirement 3. In schemes of 10 or more apartments, the Guidelines require the majority of apartments to exceed these minimum floor area standards by 10%. The Guidelines also establish further design standards for internal layout, design and private amenity space provided for the proposed apartments. In accordance with the Guidelines, duplex accommodation shall provide the additional floor area required to provide for stairways and landings in accordance with Building Regulations.

Appendix D contains a housing quality assessment prepared by project architects JFOC which outlines in a detailed table how the proposed apartments comply with the Apartment Design Guidelines on an individual apartment basis.

Based on the mix of apartments proposed – 21no. 1-bed and 21no. 2-bed, the minimum floor area to be achieved is 2,478m². An additional 10% would raise this figure to 2,726m². Collectively, the 42no. apartments have a floor area of 2,982m², is 20% above the minimum floor area requirement. Even taking into account the stairways and landing areas of duplex units, the floor area far exceeds the minimum required.

6.2.4 APARTMENT MIX

Specific Planning Policy Requirement 1 states:

Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

According to sections 3.6 & 3.7 of the Guidelines, planning authorities may also consider a two-bedroom apartment to accommodate 3 persons with no more than 10% of the total number of units in any private residential development comprising this category of two-bedroom three-person apartment.

The proposed development does not include any 2-bed 3-person apartments. Table 5 below details the proposed mix of apartments. When considered as part of the overall SHD site, the apartments represent 17% of housing provided within the overall SHD as modified with 1-bed apartments representing 8%.

	Table 5: Proposed Apartment Mix	
	Provision	Proportion
1-bed	21	50%
2-bed 4-person	21	50%
Total	42	100%

6.2.5 CAR PARKING

The Guidelines state, "as a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required." (para. 4.24).

The proposed apartments are allocated 1no. space per unit plus 1no. visitor car parking space for every three apartments in compliance with the Guidelines. The 57no. car parking spaces allocated to the apartments equate to a car parking ratio of 1.4.

6.2.6 CYCLE PARKING

The Guidelines state that apartment development shall provide a minimum of 1 cycle storage space per bedroom for each apartment unit, and one space per 2 apartment units for visitors (para. 4.17). In accordance with the Guidelines, any deviation of this standard shall be at the discretion of the planning authority. The location and design of bicycle storage must be considered with regard to safe and direct access to storage areas and to the public road.

Based on the mix of apartments (21no bed and 21no. 2-bed), 63no. spaces are proposed for residents with an additional 20no. spaces required for visitors. All bicycle parking is provided in purpose build sheltered bicycle storage structure in proximity to the duplex blocks. Please refer to JFOC drawing no. 22.127.PD2009 for the location of grouped secure bicycle storage across the application site and drawing no. 22.127.PD2009 for details.

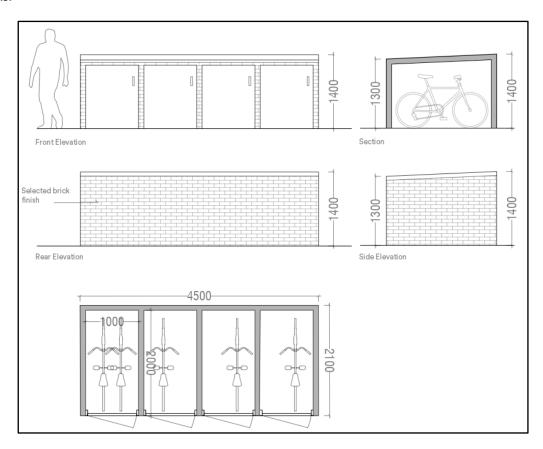


Figure 4: Extract from JFOC drawing no. 22.127.PD7001

6.2.7 DUAL ASPECT RATIOS

Specific Planning Policy Requirement 4 states:

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.
- (ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

The proposed modifications will result in 100% of apartments being dual aspect. All apartments have been shown to have a high standard of daylight and sunlight available to main living areas and bedrooms. Please refer to IES report under separate cover for full stails.

6.2.8 PRIVATE OPEN SPACE

Private amenity space shall be provided in the form of gardens or patios/terraces for all apartments and balconies at upper levels. Minimum areas for private amenity space for apartments are set out in Appendix 1 of the design standards.

Ground floor apartments have access to a private terrace (7sq.m) while apartments at $1^{st}/2^{nd}$ floor have a terrace at first floor level (7.5sq.m). All private terraces are south facing.

6.2.9 CHILDREN'S PLAY AREAS

The recreational needs of children must be considered as part of communal amenity space within apartment schemes. Children's play needs around the apartment building should be catered for.

The 42no. duplex apartments proposed as part of the modifications to the SHD are located towards the northern part of the site. It is submitted that it would be impractical to provide separate areas for communal open space for each block. For example, a block of 8no. duplex apartments would require a communal open space of 48sq.m. This space would not be functional. The SHD site will have 15% of the net site area as public open space that will be professionally landscaped and include children's play areas as well as opportunities for informal play. Based on the mix of apartments (21no. 1-bed and 21no.2-bed), 252sq.m communal open space would be required. A pocket park named 'The Triangle' (616sq.m) forms part of the public open space network and is in proximity to all the duplex units without the need for children to cross the road. Please refer to section 3.4 of the NMP landscape design statement for further details of the features in this pocket park.

6.2.10 FLOOR TO CEILING HEIGHTS

Specific Planning Policy Requirement 5 states

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

Minimum floor to ceiling height must accord with Building Regulations requirement of 2.4m, except in relation to ground floor apartments, where specific planning policy 5 requires floor to ceiling heights shall be a minimum of 2.7m.

As detailed by JFOC drawing nos. 22.127.PD4004, 22.127PD4002 and 22.127PD4006 floor to ceiling heights are 2.7 metres at all floor levels.



Figure: Extract from JFOC drawing 22.127PD4006 of Block C

6.2.11 LIFT AND STAIR CORE

Specific Planning Policy Requirement 6 states; A maximum of 12 apartments per floor per core may be provided in apartment schemes.

This policy is not relevant to the proposed apartments which have stair access only.

6.2.12 INTERNAL STORAGE

No individual storage room within an apartment should exceed 3.5 square metres.

This standard has been met. The minimum storage space requirements contained at Appendix 1 of the Guidelines have been met as detailed in the Schedule of Accommodation (Appendix D of this statement). Two storey duplexes will be fitted with insulated folding attic stairs providing access to 3.5sq.m of attic storage space in addition to storage at first and second level. The ground floor duplex units have storage in the hall area and the bedroom. Storage areas are not included in the calculation of the bedroom floor area.

6.3 URBAN DEVELOPMENT AND BUILDINGS HEIGHTS – GUIDELINES FOR PLANNING AUTHORITIES (DECEMBER 2018)

The above Guidelines recognize that securing compact and sustainable urban growth requires a focus reusing or redeveloping existing sites and buildings and building up 'Brownfield' lands and infill sites in well serviced urban locations; in particular, a focus is recommended on sites well-served by high-quality public transport and supporting services, including employment opportunities (para. 2.1-2.3). According to the Guidelines, increasing prevailing building heights will play a critical role in delivering the compact growth of our urban areas, particularly our cities and large towns, by enhancing both the scale and density of development (para. 1.21).

Paragraphs 3.4 to 3.8 of the Guidelines recognise that even in suburban and edge locations of cities and towns, it is now typical for housing developments to include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4+ storeys). As a major town identified for growth by the National Planning Framework, Drogheda would be considered appropriate for buildings heights of at least 6 storeys where appropriate and subject to certain development control criteria in order to achieve the necessary consolidation and densification of the urban area (para.1.10).

The proposed modifications will remove the two 5-storey apartment buildings permitted at the north end of the site. Since the SHD was permitted there has been a change in national policy with a move towards innovative layouts that can provide a greater variety of housing but at the same time maintaining sustainable densities. These changes as applied to the subject site enable the same residential density to be achieved without the need for increased height. The built form along the northern boundary will be three storey in height and will provide identity for the site as a new residential context.



Figure 6: 3-storey apartments frame the pedestrian link to the north of the site

Density and Typology: Specific Planning Policy Requirement 4 states:

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28
 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in
 Urban Areas (2007)" or any amending or replacement Guidelines;
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

SPPR 4 was written before the introduction of the Compact and Sustainable Settlements Guidelines (2024). It is submitted that it is now possible to provide more innovate house types that avoid the monotony of the traditional 3-bed semi-D and provide residents with their own front door and this is achieved in the proposed development. The unique topography of the application site will also introduce variation to the streetscape.

6.4 DESIGN MANUAL FOR URBAN ROADS AND STREETS (DMURS)

Waterman Moylan Consulting Engineers has designed the site layout to serve the proposed housing in compliance with DMURS placing the importance of pedestrians and cyclists over other modes of transport. Both the Engineering Assessment Report and Traffic and Transport Assessment prepared by Waterman Moylan and submitted under separate cover outline the specific design features that have been incorporated within the proposed scheme to ensure consistency with DMURS.

Design features encouraged by DMURS and integrated into the proposed amendments include using active edges to enliven the street, provision of on street car parking separating pedestrians from the roadway while having a traffic calming effect. Streets have been designed in accordance with the alignment and curvature recommendations set out in DMURS Section 4.4.6 with an orthogonal layout to encourage permeability and legibility. The modifications proposed to the permitted SHD have been designed by a multidisciplinary team to achieve the four characteristics and key design principles of connectivity, enclosure, active edge and pedestrian activities/facilities that create people friendly streets that facilitate more sustainable neighbourhoods.

A Road Safety Audit has been undertaken by Traffico Ltd and the applicant and project engineers Waterman Moylan have signed the Road safety Audit Feedback Form accepting the recommendations of the audit (See Appendix D of the Engineering Assessment Report under separate cover for details).

6.5 CHILDCARE FACILITIES - GUIDELINES FOR PLANNING AUTHORITIES (2001)

Section 2.4 of the 2001 Childcare Facilities- Guidelines for Planning Authorities recommends that in new housing areas at least one childcare facility for each 75 dwellings would be appropriate. In this regard, the Guidelines states:

"In relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site." (Section 3.3.1).

A crèche was permitted as part of the original SHD. The proposed modifications provide a new standalone crèche building that meets with the benchmark of 20 childcare places per approximately 75 dwellings excluding 1-bedroom apartments. Please refer to the Childcare Demand Assessment prepared by Stephen Ward Town Planning and Development Consultants Ltd under separate cover for further details.

7.0 CONSISTENCY WITH THE LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 (AS AMENDED)

The permitted SHD was assessed in accordance with the Louth County Development Plan 2021-2027 (LCDP), including the Core Strategy for the County (see section 6.3 of the Inspectors Report, ABP-311678-21). The LCDP was amended in July 2022 to take account of the methodology and housing projections as set out in Section 28 Guidelines and ensure the housing provision in the Development Plan is consistent with national and regional policy. The Core Strategy Table (now Table 2.15) was amended under Variation No. 1 to take account of the revised methodology and housing projections. The amendments reduced the number of housing allocated to Drogheda from 3,043 to 2,447. Dundalk and Drogheda now have the same number of units allocated to each settlement in recognition of their position in the settlement hierarchy. The SHD permission on the site (ABP-311678-21) was already permitted at the time the amendment was adopted and so was taken into account during the amendment process. The proposed modifications do not increase the number of units within the SHD and is unaffected by this amendment.

The application site is zoned A2 New Residential "To provide for new residential neighbourhoods and supporting community facilities." The principle of residential development on this site is established by the residential zoning on the site and confirmed by the permitted SHD ABP-311678-21. The overall number of dwellings units will not change as a result of the modifications proposed. There will be no change to the vehicular access point to the development or the pedestrian/cyclist permeability provided as part of the permitted SHD including the pedestrian / cycle link north to retail park.

This following section of the statement will demonstrate compliance with the relevant development management criteria of the Louth County Plan 2021-2027 as provided at Chapter 13 of the Plan. A full review of all relevant policies contained within the LCDP is provided at Appendix B.

7.1 PROPOSED VARIATION NO. 2 TO THE LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 (AS AMENDED)

Proposed Variation No. 2 was placed on public display Wednesday 27th March 2024 with submissions accepted until 4pm on Friday 26th April 2024. The purpose of Variation No. 2 is stated as follows; "To update the County Development Plan to take account of the Guidelines 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' published by the Department of Housing, Local Government and Heritage in January 2024 and issued under Section 28 of the Planning and Development Act 2000 (as amended)" (para. 1.1 Variation Document, March 2024). Section 2 of the Variation No. 2 document sets out the sections/tables in the County Development plan that are proposed to be amended as part of the proposed variation.

The proposed development has been designed in line with the Sustainable Residential development and Compact Settlements Guidelines for Planning Authorities (2024) issued under Section 28 of the Planning and Development Act 2000 (as amended). In accordance with the Act, planning authorities and An Bord Pleanála are required to have regard to the guidelines and comply with specific planning policy requirements (SPPRs) of the Guidelines¹. Accordingly, where SPPRs are stated, they take precedence over any conflicting policies and objectives of development plans. The application of the new development management criteria required by the SPPRs contained within the 2024 Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended) is not considered a material contravention of the Louth County Development Plan 2021-2027 (as amended) and is not considered premature pending adoption of proposed variation No.2 of the LDCP.

This section will outlined the policies contained within the LCDP (as amended by Variation No. 1).

7.1 DENSITY

Table 13.3 of the Louth County Development Plan recommends a minimum density of 35 dwellings per hectare for edge of settlement sites in Drogheda.

Table 3.2: Recommended Densities in Higher Tier Settlements

Settlement Category	Recommended Minimum Density per Hectare		
	Town Centre Edge of Settlement		
Regional Growth Centres Dundalk and Drogheda	50	35	
Self-Sustaining Growth Town Ardee and Dunleer	35	25	

Table 6: Extract from the LCDP Table 3.2

The permitted SHD as modified will provide a residential density of 39uph in keeping with the recommendations of the LCDP and permitted SHD.

¹ Section 28 (1C) of the Planning and Development Act 2000 (as amended)

7.2 APARTMENTS AND DWELLING SIZE AND MIX

According to the LCDP, new residential developments, and in particular larger schemes in excess of 25 units shall endeavour to provide an appropriate mix of residential accommodation. There is no specific mix required by the LCDP for housing or apartment developments. Apartment developments must accord with the provision of the Design Guidelines for New Apartments in terms of size and mix, which is addressed at Section 6.2 of this Statement and is fully compliant.

	Table 7: Residential Mix - Proposed modifications within the application site				
	Housing	Duplex / Simplex	Total		
1-bed	-	21	21		
2-bed	28	21	49		
3-bed	115	-	115		
4-bed	22	-	22		
Total	165	42	207		
	Table 8: Resid	lential Mix – SHD with Proposed modification	ıs		
	Housing	Duplex / ground floor Apartments	Total		
1-bed	-	21	21	9%	
2-bed	28	21	49	21%	
3-bed	142	-	142	60%	
4-bed	25	-	25	10%	
Total	195	42	237	100%	

Developments in excess of 50 units are encouraged to provide single storey units to meet the needs of older persons. It is a 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.

21no. of the units (9%) within the SHD as proposed to be modified will be single level apartments at ground floor level which could meet the needs of older persons and/or persons with restricted mobility. The Design Statement prepared by JFOC Architects details how universal design has been integrated into the design of house types M, P and R. Together, these 69no. units would represent 33% of the 207no. within the application site and 30% of the overall SHD site (237no.).

7.3 PROTECTION OF PRIVACY

The LCDP acknowledges that while some degree of overlooking is likely to occur in urban areas, efforts shall be made to minimise the extent of this overlooking where possible. According to the LCDP, 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. (13.8.9.1).

It is noted that the provisions of the LCDP allow for flexibility in the application of a 22m separation distance between directly opposing first floor habitable rooms in residential properties and that this separation distance is not required for windows in non-habitable rooms. The proposed modifications to the permitted SHD are based on the Specific Planning Policy Requirements of the Sustainable and Compact Settlements Guidelines for Planning Authorities (2024). SPPR 1 states "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."

All but one house proposed within the application site is two storey in height. Back to back distances between the new house types proposed is a minimum of 14m where there are no opposing first floor windows serving habitable rooms and at least 16m where there are opposing first floor windows serving habitable rooms at the rear of houses. For example figure 3 illustrates how house type L and K have a reduced separation distance of 14m but have no directly opposing windows serving habitable rooms above ground floor level. Type R has a separation distance of 16m and has windows at first floor level.



Figure 7: Extract from Site Layout Plan - Unit Key, JFOC drawing no. 22.127.PD1005

7.4 PUBLIC OPEN SPACE

In accordance with the LCDP, public open space within a residential development shall normally equate to 15% of the total site area. A reduced rate of open space may be acceptable as assessed on a case-by-case basis.

According to the paragraph 13.8.16 of the LCDP, "Developments of 50 units or more shall include proposals for the provision of a dedicated children's play area". However, Policy Objective SC17 requires the provision of play features in all new housing developments exceeding 100 residential units.

The permitted SHD provided 14.9% of the net site area as public open space. The SHD with proposed modifications in place will provide a total of 9,150sq.m of public open space representing 15% of the net (site less the 'ravine' area) site area. Public open space is distributed throughout the site and will be professionally landscaped. NMP have prepared a landscape design statement and general arrangement for the application site that also includes the main areas of public open space for the SHD site (drawing no. P-L2-100). The calculation of public open space provision does not include the Mell Stream and associated 'ravine' area towards the eastern site boundary which extends to 1.013ha and has significant amenity value.

7.5 LANDSCAPING AND BOUNDARY TREATMENTS

Under section 13.8.12 of the LCDP, landscaping proposals shall be included with all applications. This includes a full schedule of all planting to be carried out and a timescale for planting.

NMP have prepared and management and maintenance plan for the landscaping of 'Gort Mell' including the application site. Please refer to Appendix 2 and Appendix 4 of the NMP Landscape Design Statement submitted under separate cover for details of soft landscaping and a programme for implantation.

Section 13.8.11 of the Louth County Development Plan outlines the requirements for boundary treatments in residential developments as follows;

- (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 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.

Boundary treatments are clearly notated by colour on NMP drawing No.P-L2-100 General Arrangement Plan. Rear boundary walls are proposed as 2-meter high block walls. Side boundaries between properties will be 2-meter high concrete post and timber panel fencing with a concrete kicker. There will be some gardens with a retaining component included in the boundary treatment. Where there is a difference in level between back to back gardens, the minimum 2-meter wall height is maintained at the upper level to ensure the privacy of the garden at the lower level.

Walls bounding public areas are 2-metre high render finished blocks walls with brick clad piers. Acoustic fencing and gates as indicated on drawing P-L2-100 reflect the mitigation measures outlined at Section 6.2.1 of the Acoustic design statement by Amplitude Acoustics provided under separate cover. Front boundary treatments to properties include low level hedging, tree planting and 1.1m high metal railings where indicated.

7.6 PRIVATE OPEN SPACE

Section 13.8.17 and Table 13.4 provide the private open space requirements for houses. The proposed dwellings are a mixture of 2, 3- and 4-bedroom houses.

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
Apartments and Duplexes	See table 13.5	·

Table 9: Extract from section 13.8.17 - Table 13.4

The proposed modifications are in line with the Guidelines on Sustainable and Compact Settlement Guidelines (2024) and SPPR2 of those Guidelines. A full HQA is contained in Appendix D detailing all garden areas. Average and minimum garden areas are set out below-

2-bed house 40sq.m (Minimum 30sq.m)
 3-bed house 55sq.m (Minimum 44sq.m)
 4-bed house 71sq.m (Minimum 54sq.m)

7.7 CAR PARKING

The LCDP divides towns and villages in the County into three Areas, with car parking requirements a specific set of standards applicable to each Area (para.13.16.11). These standards are set out in Table 13.11, adapted below:

Development Type	Area 1	Area 2	Area 3
Residential Dwelling	1 per unit	1 per unit	2 per unit
Apartment	1 per unit	1 per unit	2 per unit
Crèche	1 per 6 children		

Table 10: Car Parking Standards as per Table 13.11

The application site is considered to be typical of Area 3 as described by Table 13.10 of the Development Plan. Having regard to the Guidelines on Sustainable and Compact Settlements (2024) and SPPR 3 contained within, 2no. car parking spaces per dwelling is considered a maximum.

It is proposed to provide 2no. spaces for 3 & 4 Bed Houses and 1no. space per 2 Bed House. The apartments will be provided with 1no. space per apartment plus 1no. visitor car parking space per 3 Apartments. This approach is in keeping with the Sustainable Urban Housing Design Standards for New Apartments (2023).

According to Section 13.16.12 of the LCDP, "A Transport Mobility Management Plan supporting any reduction in car parking shall be included with any application where the quantum of parking is significantly below that set out in the Car Parking Standards (Table 13.11)".

The level of car parking proposed is fully compliant with SPPR 3 contained within the Section 28 Guidelines on Sustainable and Compact Settlements (2024). A Travel Plan has been prepared by Waterman Moylan and submitted under separate cover in response to the Written Opinion of Louth County Council.

7.8 BIN STORAGE

According to Section 13.8.19, provision shall be made for the storage, segregation and recycling of waste in residential developments. Where communal bin facilities are provided, they shall be conveniently located, screened, and well ventilated.

All semi-detached houses have access to a rear garden/yard area for bin storage. Terraced housing and apartments have bin storage areas to the front of the property or in a convenient location in proximity to the apartments they serve as indicated on the site layout plan and highlighted by JFOC drawing no. 22.127.PD2009. Bin storage structures are finished in brick with ventilation.

7.9 INTERNAL SPACE STANDARDS

There are no internal space standards set by the LCDP for housing. The Plan recommends that relevant guidance documents including Quality Housing for Sustainable Communities (2007) be consulted when designing a residential development. The LCDP directs the reader to The Design Standards for New Apartments for Guidelines on internal space standards for apartments.

All housing proposed as part of the modifications to the permitted SHD accord with the internal space standards outlined by Table 5.1 of the Quality Housing for Sustainable Communities (2007) best practice guidelines and the Design Standards for New Apartments. Please refer to the housing quality assessment at Appendix D of this statement for further details. The universal design principles have also been applied to the new house types.

8.0 SCREENING FOR APPROPRIATE ASSESSMENT AND ENVIRONMENTAL IMPACT ASSESSMENT

An Bord Pleanála made a decision to grant planning permission to SHD ABP-311678-21 only after it had undertaken a Stage 1 and Stage 2 Appropriate Assessment and an Environmental Impact Assessment screening exercise.

Appropriate Assessment Screening: In completing the Appropriate Assessment, the Board concluded that the proposed development, by itself or in combination with other plans or projects, would not adversely affect the integrity of European sites in view of the sites' conservation objectives. This conclusion was based on a complete assessment of all aspects of the proposed project and there is no reasonable scientific doubt as to the absence of adverse effects.

Condition No. 2 of the decision ABP-311678-21 issued by An Bord Pleanála states;

"The mitigation measures contained in the Natura impact statement which was submitted with the application shall be implemented in full".

Reason: In the interests of clarify and the proper planning and sustainable development of the area and to ensure the protection of the European sites".

The applicant has submitted an NIS as requested by Louth County Council in its Written Opinion. A screening assessment was undertaken for the modifications proposed to the permitted development. This screening report identified six European Sites occurring within the wider area surrounding the project site that required examination for the potential for the project to result in likely significant effects. This includes the North-West Irish Sea cSPA which has been established after the permitted SHD was granted permission. This NIS identifies "Of these six European Sites five were identified as occurring within the zone of influence of the project. These are the Boyne River and Estuaries European Sites and the River Nanny Estuary and Shore SPA. The likely significant effects to these European Sites, as identified during the Screening Report, relates to the presence of a hydrological pathway linking the project site to the River Boyne (which itself forms part of the River Boyne and River Blackwater SAC & SPA, and which in turn drains to the Boyne Estuary European Sites. Figure 1.4 shows the hydrological pathway connecting the project site to these European Sites."

As stated at section 7.0 of the NIS "It has been concluded that, provided all mitigation measures that aim to avoid the discharge of contaminated surface drainage waters are implemented, the potential for this impact to occur will be eliminated and associated adverse impacts to the Boyne River and Estuaries European Sites will not arise.

Based upon the information provided in this NIS, it is the considered view of the authors of this NIS that it can be concluded by Louth County Council/ the competent authority that the project will not, alone or in-combination with other plans or projects, result in significant adverse effects to the integrity and conservation status of European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion."

Environmental Impact Assessment Screening: In completing the Environmental Impact Assessment screening exercise the Board concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment. The Board decided, therefore, that an environmental impact assessment was not necessary.

A preliminary examination has been undertaken of the proposed modifications to the permitted SHD and is submitted under separate cover. It is submitted that the nature of the modifications proposed to the same application site will not alter the character of the permitted development nor will it have significant effects on the Environment by reason of the nature, scale and location of the subject site. However, it is recognised that Louth County Council who is the competent authority for undertaking a preliminary examination as to whether or not significant effects are likely to arise as a result of the proposed modifications.

9.0 PART V

The 'Proposed Part V Allocation' submitted as part of the permitted SHD planning application package, will be affected by the proposed modifications to the site layout and dwelling types. A revised Part V allocation plan has been provided based on the proposed site layout plan drawing. It is respectfully suggested that as is normal with an amendment permission a condition is attached requiring compliance with the terms and conditions of the grounding permission ensuring that condition 29 of the SHD permission that deals with Part V will continue to apply

The applicant is aware of their obligations with regard to Part V and notes Condition 29 attached to the decision ABP-311678-21 issued by An Bord Pleanála requires compliance prior to commencement of development. In accordance with Section 34(3C) of the Planning and Development Act 2000 (as amended), the planning authority is restricted in its determination of this application to modify the permitted SHD by way of an LRD application to only considering the modifications proposed to the previously permitted development.

The LRD Planning application is accompanied by a letter from Louth County Council Housing Department noting the applicant is in discussions on their Part V requirements for the SHD development.

10.0 CONCLUSION

The proposed modifications will have the effect of reversing the dominant dwelling type within the permitted SHD ABP- 311678-21 from apartments to housing. This will achieve a more evenly distributed residential density across the site. The number of units to be provided and the permitted residential density will not change as a result of the proposed modifications.

Lagan Homes Tullyallen Ltd – Old Slane Road, Mell/Tullyallen, Drogheda, Co.Louth LRD Planning Application – Modifications to Permitted SHD ABP-311678-21 Statement of Consistency

APPENDIX A DESIGN CHECKLIST — DRAFT SUSTAINABLE AND COMPACT SETTLEMENTS GUIDELINES (2023)

	Design Checklist – Key Indicators of Quality Design and Place Making		
	1. Sustainable and Efficient Movement		
i)	Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement		
	for sustainable modes of transport (walking, cycling and public transport)?		
Response	Yes. The permitted SHD as proposed to be modified will contain a hierarchy of streets with primary and secondary streets and home zones. Strong urban		
	blocks and streets proposed have a clear and contained linear form. Shared surfaces and home zones help to extend the quality of public open spaces. Car		
	parking has been designed so that the majority is contained between buildings. There is a continuous pedestrian/cycle connection through the site from the		
	south on Old Slane Road to the north where a footpath is to be provided as part of the permitted development to the M1 retail park and bus stop.		
ii)	Have opportunities to improve connections with and between established communities been identified and responded to and in particular strategic		
	connections between homes, shops, employment opportunities, public transport, local services and amenities?		
Response	Yes. The permitted development includes a pedestrian/cycle connection from the north of the site to the M1 retail park which functions as a district centre		
	with a supermarket, café, takeaway outlets, gym and shopping opportunities. Also as part of the development already permitted on site, the footpath network		
	along Old Slane Road will be improved to provide continuous footpath connectivity to the east where there is a GAA pitch, Aldi supermarket and primary		
	school with a childcare service and then onwards towards the town centre.		
iii)	Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to		
	calm traffic and enable the safe and comfortable movement of vulnerable users?		
Response	Yes. The permitted SHD is DMURS compliant. The proposed modifications also support a DMURS approach to pedestrian priority and traffic safety.		
iv)	Has the quantum of parking been minimised (in accordance with SPPR4) and designed and located in a way that seeks to reduce the demand for private		
	car use, promote sustainable mode of transport and ensure that the public realm is not dominated by parked vehicles?		
Response	Yes. Car parking provision on site is balanced having regard to the proximity to and frequency of available public transport and the need to accommodate the		
	private car. The permitted pedestrian/cycle link from the site to the north along a new footpath / cycle track on the south side of the R168 provides a shorter		
	route to existing services and facilities, including a bus stop which promotes cycling/walking over the private car for daily trips.		

	2. Vibrant Centres and Communities				
i)	Is the mix and intensity of land uses appropriate to the site and its location and have different uses been distributed in a complementary manner to				
	ensure that there is a range of local services and amenities and access to public transport all within a short walk or cycle of homes?				
Response	The proposed modifications seek to amend a permitted SHD. The site is within walking distance of local services and amenities as well as access to public				
	transport. The childcare facility designed to serve the needs of the new community has been centrally located within the development to encourage				
	walking/cycling to drop off/collect children. This facility is contained within phase 1 of the proposed development as illustrated by JFOC drawing				
	22.127.PD2005.				
ii)	Have a diverse and innovative range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand				
	Assessment), supplemented by innovative range of housing typologies that support greater housing choice?				
Response	Yes. The proposed modifications are in response to Guidelines on achieving compact residential development while providing own door housing. A mix of 2-,				
	3- and 4- bedroom houses are proposed in addition to duplex apartments. This range of house sizes will provided for different life stages and greater choice.				
	Using the new approach provided for by the new Section 28 Guidelines on Sustainable and Compact Settlements there will no longer be the imbalance of high				
	density apartments to the north of the SHD site and lower density housing to the south. All residents will have their own front door and housing will be an				
	affordable option for all. The HDNA for Louth does not identify any area where a specific housing mix is required.				
iii)	Will the plan or development proposal supplement and/or support the regeneration and revitalisation of an existing centre or neighbourhood, including				
	the adaption and re-use of the existing building stock in order to reduce vacancy and dereliction (where applicable)?				
Response	Not applicable. The proposed planning application seeks to modify a permitted SHD on a greenfield site.				
iv)	Is the regeneration and revitalisation of an existing centre or neighbourhood supported by the enhancement of the public realm so as to create a more				
	liveable environment, attract investment and encourage a greater number of visitors (where applicable)?				
Response	Not applicable. The proposed planning application seeks to modify a permitted SHD on a greenfield site.				

	3. Landscape and Heritage		
i)	Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas		
	and landmarks and the setting of protected structures, conservation areas and historic landscapes?		
Response	Yes. The permitted SHD and proposed modifications are respectful of and enhance the site's natural geological features which include the Mell Stream and		
	associated ravine. The site of the SHD is not affected by any scenic views & prospects as contained in the LCDP nor is it on a scenic route. According to Map		
	8.15 of the LCDP the SHD site falls within an Area of High Scenic Quality (AHSQ 3). The principle of residential development of the site has been permitted		
	under ABP-311678-21. The proposed amendments will reduce the height of buildings to the north of the site and will not alter the character of development		
	already permitted. The site was thoroughly assessed with regard to cultural heritage, archaeology and its geological interest as part of the SHD planning		
	application process. The revised site layout maintains views towards the McAleese / Boyne Valley Bridge over the Boyne River to the south of the site.		
ii)	Have a complementary and interconnected range of open spaces and corridors been provided, that create and conserve ecological links and promotes		
	active travel and healthier lifestyles?		
Response	Yes. The preservation of Mell Stream and a riparian corridor conserves ecological links and provides the opportunity for the north/south pedestrian link		
	through the site. As detailed by the Landscape Design Statement prepared by NMP and submitted under separate cover, a range of passive and active spaces		
	have been provided throughout the application site for which will promote healthier lifestyles. The open spaces within the development are well orientated		
	and related to the houses they serve, structured, functional and hierarchical. Analysis undertaken by IES demonstrates all public open space will receive		
	sunlight in line with BRE recommendations.		
ii)	Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of		
	other spaces within the network)?		
Response	Yes. There is a hierarchy of public open spaces across the site that are universally accessible as detailed by the Landscape Design Statement prepared by NMP		
	and submitted under separate cover. The open spaces within the development are well orientated and related to the houses they serve, structured, functional		
	and hierarchical.		

iv)	Does the plan or development proposal include integrate nature-based solutions for the management of urban drainage to promote biodiversity, urban			
	greening, improved water quality and flood mitigation?			
Response	The proposed planning application seeks to modify a permitted SHD. It is not proposed to modify the surface water drainage strategy for the site which alr			
	includes SUDs methods and flood mitigation measures. The landscape plan for the site by NMP landscape architects features native trees and pollinator			
	friendly planting to enhance biodiversity as detailed in the Landscape Design Statement under separate cover.			
	4. Responsive Built Form			
i)	Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure with particular regard to land			
	uses, the location of gateways and landmarks, the hierarchy of streets and spaces and access to daylight and sunlight?			
Response	Yes. The permitted layout from the entrance on the Old Slane Road and access road north will be maintained along the first 30no. houses. It is then proposed			
	to modify the road layout to facilitate the introduction of stronger urban blocks of housing that will use local streets and home zones to provide a network of			
	streets that promote pedestrian activity and create a legible public realm. The reorientation of the housing blocks on site provides for the majority of housing			
	to be orientated east-west and avoid north facing gardens. Houses are mainly two storey in height with increased height provided by apartment buildings to			
	identity the development along the R168.			
	An assessment of daylight, sunlight and overshadowing has been undertaken by IES which has informed the proposed development as detailed by the			
	Residential Amenity Report under separate cover. The assessment by IES demonstrates that 100% of the rooms tested achieved the daylight and sunlight			
	provision targets. The assessment of sunlight to amenity spaces applied to the 165no. gardens of the proposed houses demonstrates a 95% pass rate when			
	compared against the minimum area required for each dwelling. The gardens that fall below the recommend levels of sunlight are in the shade due to their			
	plot shape and position relative to neighbouring dwellings.			
ii)	Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive			
	surveillance and provide an attractive and animated interface?			
Response	Yes. The modifications proposed to the permitted SHD will create new streets that are active with building lines that form a strong urban edge to contain the			
	streets and public spaces and with own-door housing in proximity to the street edge resulting increased level of passive surveillance. Car parking has been			
	located between buildings by using stepped housing forms that integrate cars into the layout as well as on street to avoid a car dominated streetscape. This			
	design approach further enhances the interaction between the occupants of the houses and activities on the street. All houses have a private garden to the			
<u> </u>				

rear of the building line* which is clearly defined. Duplex apartments have large south facing terraces to enjoy. Housing blocks are designed to turn the corner with no blank facades and provide passive surveillance of all public open spaces.

(*House Type O has private amenity space to the front of the property to sure a high level of amenity. The open space to the rear of these properties is not counted towards private open space provision as it is exposed to high levels of road noise.)



iii)	Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant) and provide appropriate				
	transitions with adjacent buildings and established communities?				
Response	Yes. The proposed planning application seeks to modify a permitted SHD. It does not seek to mirror prevailing house types in the area which are either 'one-				
	off' type houses on the road edge or low density housing mostly in housing estate form further east on the Old Slane Road. The SHD and proposed				
	modifications aim to achieve a different urban environment more reflective of recent and emerging planning policy aims. It seeks to achieve an environment				
	that is to a higher density, with more interest and variety in terms of house types and layout in a more compact urban form. The area in which the site is				
	located is impacted by roads infrastructure, particularly the M1 and associated lighting junctions and slip roads and displays typical characteristics of an urban				
	fringe. The M1 Retail Park is located to the east of the site and is imposing in the landscape viewed from both the R168 and on approach along the M1				
	travelling north. Development to the south, along the Old Slane Road largely consists of residential dwellings on their own plots to the west of Old Slane Road				
	next to the M1 and multiunit housing development to the east and south of Old Slane Road. The proposed modifications include a reduction in height and				
	scale to the north of the site from the 5-storey apartment buildings to 3-storey duplex but will maintain a presence to the R168 along the northern boundary.				
iv)	Has a coherent architectural and urban design strategy been presented that will ensure the development is distinctive, complements the urban				
	structures and promotes a strong sense of identity?				
Response	Yes. The application site is a greenfield site. It is self-contained and not particularly large in scale for the town of Drogheda. The permitted SHD with				
	modifications seeks to create a neighbourhood including new streets, pedestrian/cycle connections and public open spaces. The modifications proposed are				
	a specific response to the site's unique characteristics and updated national planning policy. The architectural expression and urban design strategy proposed				
	as part of the modifications is detailed by the Architects Design Statement by JFOC Architects under separate cover. The character of the public realm defines				
	the scheme and building finishes remain consistent using a simple pallet of materials. To complement the simple detail of the facades it is proposed to use				
	flush gables with render running flush to slate soffits with a low profile eaves and discrete rainwater goods. The development is designed by a firm of qualified				
	and experienced architects, landscape architects with the support of a full team of professionals with expertise in the built and natural environments.				

v) Does the development integrate well within its context and will the safety and amenity of future residents and of residential and other sensitive occupiers of adjacent properties be safeguarded to a reasonable extent?

Response

Yes. The first 30no. units of the permitted SHD are under construction. The first house forms a 'gate lodge' approach at the entrance and is flanked by a public open space. This provides an appropriate transition between the low density single storey housing that fronts Old Slane Road and the application site. The proposed modifications to the permitted SHD will not result in any alterations to the residential amenity of existing properties. The modifications to the design will continue to ensure safety and amenity for future residents by providing active frontages and passive supervision to all public areas with clear boundaries between public and private space.



Lagan Homes Tullyallen Ltd – Old Slane Road, Mell/Tullyallen, Drogheda, Co.Louth LRD Planning Application – Modifications to Permitted SHD ABP-311678-21

Statement of Consistency APPENDIX B LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 POLICY OBJECTIVES This table contains policy objectives from the LCDP relevant to the proposed development. The table has been referenced using the LCDP chapter heading and details how the proposed development will satisfy and assist their aims in bold italic text.

Topic	Objective	Objective - Text
	Reference	
Strategic	SO3	Direct new development in accordance with the Core and Settlement Strategies, which will provide for the sustainable development of
Objectives of		the County for the period 2021-2027 and beyond and in accordance with the principles of compact growth, consolidation and
the LCDP		regeneration.
		The permitted SHD is located in Drogheda, one of the two growth centres for the County where the majority of population growth is
		directed under the core Strategy. The modifications proposed by the planning application will further promote the principles of compact
		growth by applying the most recent Section 28 Guidelines on Sustainable and Compact Settlements.
Core and	CS 1	To secure the implementation of the Core Strategy and the Settlement Strategy in so far as practicable, by directing sustainable growth
Settlement		towards the designated settlements, subject to the availability of infrastructure and services.
Strategy		The proposed planning application seeks to modify a permitted SHD within Drogheda, a designated growth settlement. The applicant
		are experienced house builders and have recently completed the development of Newtown Woods in Drogheda. Based on their
		experience and professional advice they consider the modifications proposed better reflect market demand in Drogheda. By providing
		more attractive accommodation, Drogheda is more likely to meet its population target under the Core Strategy.
	CS10	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.
		The proposed modifications to the permitted SHD will provide a greater variety of house types within the permitted SHD which it is
		submitted will be attractive to future residents of Drogheda.
	CS11	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.

Topic	Objective	Objective - Text
	Reference	
Core and		Based on the modified mix of dwellings proposed, the SHD as modified will provide accommodation for a new community assisting in
Settlement		growing Drogheda to City scale.
Strategy	SS1	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.
		It is submitted that the modifications proposed to the permitted SHD will result in a more attractive residential development where all
		residents have their own front door and can choose the appropriate size of home for their circumstances. It is well recognised that the
		provision of affordable housing is required to support economic growth.
	SS 4	To support high density sustainable development, particularly in centrally located areas and along public transport corridors and require
		a minimum density of 50 units/ha in these locations.
		The permitted SHD has a residential density of 39uph reflecting it's out of centre location. The proposed development will maintain the
		same residential density as permitted by An Bord Pleanála while providing a greater variety of house types.
	SS 5	To support increased building heights at appropriate locations in Drogheda, subject to the design and scale of any building making a
		positive contribution to its surrounding environment and streetscape
		The proposed modifications will reduce the permitted height at the north of the SHD but will provide buildings that are of sufficient
		height to maintain a presence to the R168 along the northern boundary.
	SS10	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.
		The proposed modifications to the permitted SHD seek to contribute towards achieving objective SS10 by applying the SPPRs contained
		within the Sustainable Compact Settlements Guidelines (2024). Application of the development management criteria contained within
		the Guidelines allows for the multi-storey apartments previously permitted to be replaced with own door housing and duplex units.

	Objective - Text
Reference	
	This modification will greatly improve the choice of home available on site and create an attractive neighbourhood while maintaining
	an efficient residential density.
HOU 1	To secure the implementation of the Louth Housing Strategy 2021-2027.
	The Louth Housing Strategy seeks "To ensure that a suitable variety and mix of dwelling types and sizes is provided in developments to
	meet different needs, having regard to demographic and social changes" as one of its objectives (Section 6.1). Household size is expected
	to decline in County Louth over the Plan period (Section 4.2.3). The new house types proposed to be introduced to the permitted SHD
	provide 1-, 2-, 3- and 4-bedroom dwellings which can cater for smaller household sizes and provide choice to people at different life
	stages.
HOU3	To apply a social and affordable housing requirement, in accordance with the requirements of Part V of the Planning and Development Act 2000 (as amended).
	The applicant will comply with the obligations under Part V as per the permitted SHD. Housing identified for transfer is indicated on drawing no. 22.127.PP2001 based on the modifications proposed.
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 permitted SHD already has the advantage of providing connections north and south of the site linking residents to surrounding
	local services and community facilities as well as public transport. The mix of apartments and houses as modified provides a choice of accommodation across all the life stages and has been designed as a neighbourhood that prioritises pedestrians over the private car.
	HOU 1

Topic	Objective	Objective - Text
	Reference	
Housing	HOU15	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.
nousing		The application of the Section 28 Guidelines on Sustainable Compact Settlements allows a sustainable density to be provided on site without the imbalance of high density apartments as permitted.
	HOU16	To support increased building heights in appropriate locations in the Regional Growth Centres of Drogheda and Dundalk.
		The modifications proposed to the permitted SHD seek to provide a medium density own door development. The maximum building height is 3 storeys. Three storey elements are used to clearly identify the development at the northern boundary on entry to Drogheda.
	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 permitted SHD has already established a key element of the site's identity by focussing public open space on the eastern side of the development in proximity to on the Mell Stream and associated ravine. As previously stated, the Mell Stream and associated ravine do not form part of the public open space provision for the development. The open space structure provides a high quality amenity area for residents and new pedestrian/cycle link for existing residents on Old Slane Road. The landscape strategy for the proposed modifications locates pocket parks within easy reach of all residents. The streets are viewed as a social space and the modifications further elevate the pedestrian / cyclist over the private car.
	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 'Urban Design Manual – A Best Practice Guide (2009)' and any subsequent guidance, to ensure the creation of quality, attractive, and well connected residential areas and neighbourhoods.

Topic	Objective	Objective - Text
	Reference	
		The permitted SHD with modifications proposed has been assessed using the Design Checklist contained in Appendix D of the Sustainable and Compact Settlements Guidelines (2024) which supersede the Guidelines Sustainable Residential Development in Urban Areas (2009) and associated Urban Design Manual.
Housing	HOU 21	To ensure that new residential developments are consistent, in so far as practicable, with the 'Guidelines on Sustainable Residential Development in Urban Areas' in creating attractive, sustainable, climate resilient and healthy communities.
		The permitted SHD with modifications proposed has been assessed against the provisions of the Sustainable and Compact Settlements Guidelines (2024) which supersede the Guidelines Sustainable Residential Development in Urban Areas (2009).
	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.
		The permitted SHD and modifications proposed facilitate walking and cycling. The permitted SHD provides a key linkage to the M1 retail park for residents to avail of public transport, convenience and comparison shopping and this link is retained within the proposed modified development. This link will prioritise walking over taking the car as it provides a shorter travel time to the retail park.
	HOU 23	To require the layout of residential developments to take account of the Design Manual for Urban Roads and Streets (2019) in the provision of pedestrian and cycling infrastructure and crossing points and the design of estate roads and junctions.
		The proposed modifications have been designed by JFOC Architects and Waterman Moylan Consulting Engineers to be fully compliant with DMURS.
	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.

Topic	Objective	Objective - Text
	Reference	
		The new urban housing blocks include public open space within easy reach of every house proposed. These pocket parks have been
		individually design and given identity – The Triangle, Serpentine, the Village Green and the Kick-About in addition to Ravine Park. All
		dwellings are active and engaged at street level and elevations continue to be active around all corners. The permitted SHD with
		modifications will provide 15% of the site area as public open space in total. As noted, the Mell Stream and the ravine itself do not form
Housing		part of the calculated 15% public open space provision for the SHD site but add significantly to the site's amenity value.
	HOU 25	All new residential and single house developments shall be designed and constructed in accordance with the Development Management
		Guidelines set out in Chapter 13 of this Plan.
		Please refer to section 7 of this statement for an assessment of the proposal against Development Management Guidelines set out in
		Chapter 13. On the adoption of the Section 28 Guidelines on Sustainable and Compact Settlements in January 2024, a number of
		development management guidelines within the LCDP have been superseded by SPPRs.
	HOU26	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 proposed development will enhance the mix of house types within the permitted SHD. It is submitted the creation of a medium
		density own door development is preferable to a development where the majority of dwellings provided as apartments as permitted.
	HOU27	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.
		There is one single storey house (House Type S) and 21no. of ground floor single level apartments proposed representing 9% of the total
		number of dwellings within the SHD as modified.

Topic	Objective	Objective - Text
	Reference	
	HOU 28	To encourage innovation in design that delivers buildings of a high quality that positively contribute to the built environment and local streetscape.
Housing		As detailed by the Architects Design Statement by JFOC under separate cover, the new housing blocks proposed aim to provide a strong urban streetscape using high quality material while maintaining a simple expression.
		The proposed 'House Type O' is an example of an innovation in design that will contribution to the built environment. By using the built
		form to mitigate noise intrusion from the M1 motorway along the western boundary, own door housing can be provided in place of
		apartment blocks.
	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 'Building for Everyone: A Universal Design Approach' published by the Centre for Excellence in
		Universal Design.
		As detailed by the JFOC design statement under separate cover, the proposed development has sought to comply with the principles of
		universal design throughout the site to encourage access and use of the development regardless of age, size, ability or disability. The
		proposed design takes account of guidelines contained within the National Disability Authority documents "Building for Everyone: A
		Universal Design Approach" and "Universal Design Guidelines for Homes in Ireland".
		Universal Design notes are shown in green on the floor plans for House Types M, P and R and ground floor apartment type Q1 in the
		Design Statement. These 69no. units (Types M, P, R & Q1) represent 30% of the entire SHD (237no.dwellings).
	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.
		The proposed modifications remove the apartment buildings to the north of the SHD site and provide 2 and 3 storey housing and duplex apartments. All dwellings within the amended SHD will be dual aspect, maximising daylight and natural ventilation.

Topic	Objective	Objective - Text
	Reference	
		House Type O has been designed for a specific function and purpose. Due to the noise intrusion along the western boundary, windows on the western façade at first floor level do not serve habitable rooms. This house type is dual aspect but windows to the bathrooms and landings at first floor level are not required to be openable for fire safety or ventilation purposes in order to protect the residents from noise instruction but can be opened for ventilation if required.
Social and community	SC 6	To ensure the integration of age friendly and family friendly strategies in all new neighbourhoods including the provision for flexible housing typologies, buildings and open spaces that are designed so that everyone, including older persons, people with disabilities, and people with younger children can move about with ease, avoiding separation or segregation.
		It is submitted that the proposed amendments to provide all own door housing within the permitted SHD is both age friendly and family friendly. The streets are active and pocket parks are within walking distance providing opportunities to socialise and play. The landscape strategy for the SHD site provides opportunities for both passive and active recreation for residents. There are seating opportunities along the linear park and gentle slopes to ensure people of all ages and abilities can access this amenity area.
Social and community	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.
		The proposed planning application seeks to modify a permitted SHD. The social infrastructure assessment for the permitted SHD has been updated and is attached at Appendix C.
	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.

Topic	Objective	Objective - Text
	Reference	
		The permitted SHD as modified will provide play features as detailed in the landscape design statement prepared by NMP Landscape
		Architects. This includes natural play elements and kick about areas.
	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 Childcare Facilities Guidelines for Planning Authorities (2001) and
		Childcare Regulations (2006) and any subsequent guidelines, in consultation with the Louth County Childcare Committee. Such facilities
		will be directed to settlements identified in the Settlement Hierarchy.
		A childcare facility was permitted as part of the SHD. The proposed modifications provide new housing blocks and the childcare facility
		has been redesigned as a standalone building. The location of the creche is central to the development and is easily accessible from the
		main access route from Old Slane Road. Please refer to Childcare Demand Assessment by Stephen Ward Town Planning and
		Development Consultants Ltd under separate cover for details of the crèche proposed.
Economy and	EE 17	To recognise that attractive, healthy, and sustainable communities have a fundamental role in delivering economic success and attracting
Employment		foreign and domestic investment.
		IBEC, Ireland's largest lobby and business representative group ² in a recent survey of CEOs found that more than 70% of firms pointed
		to housing availability as a challenge to their operations. According to 'Better Housing Better Business', "The crisis in the availability of
		affordable housing in Ireland is becoming the critical barrier to the continued growth and development of business investment. An
		inadequate supply of affordable housing is the single largest impediment to attracting and retaining talented workers, without whom
		business investment and expansions are not possible." Enterprise Ireland have also voiced concern with the lack of affordable housing
		causing a barrier to future growth.

² Better Housing Better Business January 2023

Topic	Objective	Objective - Text
	Reference	
		It is submitted that the modifications to the permitted SHD proposed will provide a successful and attractive neighbourhood. The
		provision of an SHD in the designated growth centre of Drogheda will assist in the achievement of the following economic and
		employment policies of the LCDP.
		EE 28 To prioritise economic development in Drogheda and Dundalk taking account of the strategic importance of the settlements
		along the Dublin-Belfast Economic Corridor and their designation as Regional Growth Centres in the RSES.
		EE 30 To promote and facilitate the Regional Growth Centres of Drogheda and Dundalk as creative and innovative centres that
		are competitive, accessible and attractive, each with their own distinct identity and built heritage.
		EE 33 To promote the Regional Growth Centre of Drogheda as a primary centre for employment in the County that maximises the
		locational advantage of the town along the Dublin-Belfast Economic Corridor
		EE 35 To promote Drogheda as a location for Foreign Direct Investment.
Economy and	E 37	To support the development of employment lands in the town including:
Employment		i) The lands in the northern part of the town adjacent to the M1 Retail Park
		ii) The lands adjacent to Tom Roes Point
		The development of these lands shall be for economic investment and employment generating uses. Development shall only take place
		in areas where a Masterplan has been agreed in writing with the Planning Authority in accordance with the requirements set out in Section
		13.5 'Masterplans' in Chapter 13 - Development Management Guidelines.
		It is noted that planning permission was granted by Louth County Council under P.A.Ref.22/954 for a commercial/retail development
		on lands to the south of the M1 Retail Park. A planning application for planning permission under P.A. Ref. 2360115 has been made for
		employment generating development at the IDA Drogheda North Business Park 2km walking/cycling distance from the site's northern

Topic	Objective	Objective - Text
	Reference	
		boundary. The IDA also have a planning application under consideration by Louth County Council P.A. Ref. 2360388 for a new Advanced
		Building Solution consisting of office and light industrial/production spaces within this business park.
		The permitted SHD site is well located to existing and future areas of employment and will support new services in the area.
Movement	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.
		The permitted SHD as modified will maintain the permitted residential density that will assist in providing a critical mass to support
		existing services and investments in future public transport.
	MOV 4	To promote sustainable higher density development along public transport corridors.
Marramant		The residential density of the permitted SHD as modified is fully in keeping with national guidelines.
Movement	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.
		As detailed by the Design Statement prepared by JFOC Architects Design, the proposed house types and public open spaces have been
		designed for universal access.
	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 permitted SHD provides a pedestrian/cycle link to the bus stop within the M1 Retail Park. This link provides a shorter route to every
		day services than taking the private car, encouraging a modal shift.

Topic	Objective	Objective - Text
	Reference	
	MOV11	To facilitate the provision of electricity charging infrastructure for electric vehicles both on street and in new developments in accordance with car parking standards prescribed in the Development Management Guidelines in Chapter 13.
		The SHD as modified will comply with this policy by providing EV charging points and ducting in accordance with Development Plan requirements and as per condition 10 of ABP-311678-21. The majority of car parking is in-curtilage. As illustrated by Waterman Moylan drawing no. E1001, 20% of communal car parking spaces will be provided with active e-car charging spaces with ducting provided for future provision of e-car charging for all communal car parking spaces.
	MOV 14	To encourage a modal shift from use of the private car towards more sustainable modes of transport including walking, cycling, and public transport.
		It is submitted that the permeability and local street network offered by the proposed amendments will encourage walking and cycling. As stated above, the permitted SHD already provides a pedestrian/cycle link to the M1 Retail Park and full footpath connectivity along Old Slane Road.
Movement	MOV 25	To support the retrospective provision of walking and cycling infrastructure in existing settlements, where feasible, to achieve growth in sustainable mobility and strengthen and improve the walking and cycling network.
		The permitted SHD already provides a pedestrian/cycle link to the M1 Retail Park and full footpath connectivity along Old Slane Road. No amendments are proposed to this infrastructure.
	MOV 26	To improve pedestrian and cycle connectivity to schools, third level colleges, major employment areas, bus and rail stations, and other public transport hubs
		The permitted SHD already provides a pedestrian/cycle link to the M1 Retail Park and full footpath connectivity along Old Slane Road towards the town centre and primary school in Mell.

Topic	Objective	Objective - Text
	Reference	
	MOV 27	To review the feasibility and implementation (where deemed necessary) of the 30km/h zones in Drogheda and Dundalk in creating attractive, low speed environments.
		The SHD as modified has been designed in keeping with DMURS and will be a low speed environment where pedestrians have priority.
	MOV 41	To promote and facilitate development at urban–related* interchanges in accordance with the zoning provisions for Drogheda and Dundalk as set out on the zoning maps for Drogheda and Dundalk in the Louth County Development Plan and any subsequent Local Area Plans adopted for these settlements. Any large scale development proposal in proximity to these interchanges will be required to prepare a Traffic and Transport Assessment in accordance with the requirements of the '2014 Transport and Traffic Assessment Guidelines' *Urban–related interchanges are Ballymascanlon (Junction 18), Castleblayney Road (Junction 17), Dundalk South interchange (Junction 16) and Drogheda North (Junction 10).
Movement		The SHD site is located to the north of Junction 10. No vehicular access is provided from the site to the R163 which joins to Junction 10 (eastern arm). The site is zoned for residential development under the LCDP and an SHD is permitted on site. The permitted SHD was subject to a Traffic and Transport Assessment. The SHD as proposed with modifications has been assessed by Waterman Moylan Consulting Engineers and a TTA with updated traffic counts is provided under separate cover.
	MOV 46	To support improvements and upgrades to the road network in the County in accordance with the projects set out in Table 7.6 and any other project identified by the Council or included in any future updated Road Works Programme, subject to the availability of funding.
		It is noted that Table 7.6 contained in the LCDP lists 'Leonards Cross, Drogheda' for works comprising 'road realignment'. Condition No. 33 of the decision to grant issued by An Bord Pleanála Ref. ABP-311678-21 requires the developer to pay a special contribution under section 48(2)(c) in respect of upgrading Leonards Cross (R168/Old Slane Road) Junction.
	MOV 47	To require the preparation of Transport and Traffic Assessments for new developments in accordance with the requirements set out in the TII Traffic and Transport Assessment Guidelines.

Topic	Objective	Objective - Text
	Reference	
		The permitted SHD was subject to a Traffic and Transport Assessment. The SHD as proposed with modifications has been assessed by Waterman Moylan Consulting Engineers and a TTA with updated traffic counts is provided under separate cover.
	MOV 57	To restrict development proposals for residential or other use within 100 metres of either the M1 Motorway or N1/A1 National route in all but exceptional circumstances. The exceptional circumstances are where the development is an infill development and located along an established building line. Any development shall be required to comply with the requirements of the Spatial Planning and National Roads Guidelines (2012) and Policy Objectives ENV 6 and ENV 7 and the costs of implementing any mitigation measures concerned shall be borne by the developer.
		The proposed planning application seeks to modify a permitted SHD. The proximity to the M1 was assessed by the Inspector in his report (11.6.17) of the permitted SHD ABP-311678-21. As stated at section 1 of this statement, An Bord Pleanála considered the permitted SHD to be an infill development and housing within 100 metres of the M1 Motorway was found to be acceptable subject to the design specifications described in the submitted Acoustic Design statement (Condition No. 4). The modifications proposed to the permitted SHD have undergone detailed assessment with regard to noise intrusion. In keeping with policy objectives ENV 6 and ENV 7, mitigation measures will be undertaken to avoid, prevent and reduce residents' exposure to environmental noise from the M1 Motorway. Please refer to report by Amplitude Acoustics for further details.
Natural heritage,	NBG 3	To protect and conserve Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated under the EU Habitats and Birds Directives.
biodiversity and green infrastructure	NBG 4	To ensure that all proposed developments comply with the requirements set out in the DECLG 'Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities 2010'.
mirastructure	NBG 6	To ensure a screening for Appropriate Assessment (AA) on all plans and/or projects and/or Stage 2 Appropriate Assessment (Natura Impact Report/ Natura Impact Assessment) where appropriate, is undertaken to make a determination. European Sites located outside of the

Topic	Objective	Objective - Text
	Reference	
		County but within 15km of the proposed development site shall be included in such screenings as should those to which there are
		pathways, for example, hydrological links for potential effects.
		A screening assessment was undertaken for the modifications proposed to the permitted development. This screening report identified
		six European Sites occurring within the wider area surrounding the project site that required examination for the potential for the
		project to result in likely significant effects. This includes the North-West Irish Sea cSPA which has been established following the
		approval of the permitted SHD. The NIS identifies "Of these six European Sites five were identified as occurring within the zone of influence
		of the project. These are the Boyne River and Estuaries European Sites and the River Nanny Estuary and Shore SPA. The likely significant
		effects to these European Sites, as identified during the Screening Report, relates to the presence of a hydrological pathway linking the
		project site to the River Boyne (which itself forms part of the River Boyne and River Blackwater SAC & SPA, and which in turn drains to the
		Boyne Estuary European Sites. Figure 1.4 shows the hydrological pathway connecting the project site to these European Sites."
		As stated at section 7.0 of the NIS "It has been concluded that, provided all mitigation measures that aim to avoid the discharge of
		contaminated surface drainage waters are implemented, the potential for this impact to occur will be eliminated and associated adverse
		impacts to the Boyne River and Estuaries European Sites will not arise.
		Based upon the information provided in this NIS, it is the considered view of the authors of this NIS that it can be concluded by Louth County
Natural		Council/ the competent authority that the project will not, alone or in-combination with other plans or projects, result in significant adverse
heritage,		effects to the integrity and conservation status of European Sites in view of their Conservation Objectives and on the basis of best scientific
biodiversity		evidence and there is no reasonable scientific doubt as to that conclusion."
and green		
infrastructure		NBG 11 Where feasible, ensure that no ecological networks, or parts thereof, which provide significant connectivity between areas of local
		biodiversity, are lost without remediation as a result of implementation of this Plan.

Topic	Objective	Objective - Text
	Reference	
		It is recognised that Mell Stream and the associated ravine is part of an ecological network. The permitted SHD provides a 20m buffer zone free of development and this is not proposed to be modified as part of the proposed planning application.
	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.
		No non-native invasive species were identified in the Ecological Impact Assessment undertaken for the permitted SHD. A further survey will be undertaken prior to construction of the proposed development and measures to reduce the spread of invasive species from other sites by construction plant and equipment will be incorporated into the final Construction Management Plan as recommended at section 5.3.1 of the EcIA.
	NBG 14	To protect from inappropriate development and maintain the character, integrity and conservation value of those features or areas of ecological interest listed as pNHA or that may be designated as NHA, during the lifetime of this Plan.
Natural heritage,		As outlined in the Natura Impact Statement prepared for the permitted SHD and NIS provided under separate cover, principal risks associated with the project to European Sites as well as pNHAs relate to perturbations to water quality, and associated risk to freshwater habitats of the River Boyne and River Blackwater European Sites and associated pNHAs downstream of the project site during the construction and operation phase. A range of measures will be implemented to ensure surface water quality in the Mell Stream is not perturbed during the construction and operation phase of the proposed development. It is predicted that the proper implementation of these measures will prevent residual impacts to surface water quality.
biodiversity	NBG 17	In consultation with the Geological Survey of Ireland, protect from inappropriate development and maintain the character, integrity and conservation value of those features or areas of geological interest listed in Table 8.4 of the Plan

Topic	Objective	Objective - Text
	Reference	
and green infrastructure		It can be seen from Map 8.4 contained in the LCDP that the site of the permitted SHD forms part of an area of Geological Interest. Table 8.4 of the LCPD lists this site as 'H32 Waterunderbridge-Dry Bridge' with a proposed designation of CGS. CGS refers to sites of lesser importance which should still be protected as County Geological Sites. The principle of residential development has been permitted
		under ABP-311678-21. The proposed modifications apply to house types and site layout design and will not impact upon the site's geological interest.
	NBG 29	To protect trees subject to Tree Preservation Orders and seek to designate additional Tree Preservations Orders (TPO), where appropriate.
		TPO 5 Mell, Drogheda is located to the north of the R168 and does not extend to the SHD site.
	NBG 37	To protect the unspoiled rural landscapes of the Areas of High Scenic Quality (AHSQ) from inappropriate development for the benefit and enjoyment of current and future generations.
		The site of the permitted SHD falls within an area designated as an Area of High Scenic Quality identified by map 8.15 of the LCDP. The proposed modifications will not alter the character of development that has already been permitted on site.
	NBG 38	Protect and sustain the established appearance and character of views and prospects listed in Tables 8.14 – 8.18 of this Plan that contribute to the distinctive quality of the landscape, from inappropriate development.
		The SHD sites is not affected by any views identified by map 8.16 and 8.18. The development of the site for residential use has already been permitted.
Natural heritage,	NBG 48	All future development proposals shall require within the overall design scheme the integration of environmental assets and existing biodiversity features including those identified in Table 9 of the Green Infrastructure Strategy Appendix 8, Volume 3, to enhance the quality, character and design of the proposal. Objectives relative to the application site outlined by Appendix 8 are listed below-

Topic	Objective	Objective - Text
	Reference	
biodiversity and green infrastructure		 GI 5 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. GI 7 To prepare specific Green Infrastructure Strategies for the Regional Growth Centres of Drogheda and Dundalk and integrate into the Local Area Plan for each settlement. GI 8 All future development proposals shall require, within the overall design scheme, the integration of environmental assets and existing biodiversity features including those identified in Table 9 of the Green Infrastructure Strategy, to enhance the quality, character and design of the proposal. GI 9 To require the integration of green infrastructure and inclusion of native planting schemes in all development proposals in
		Iandscaped areas, open spaces and areas of public space. • Table 10: Native Planting Scheme The permitted SHD integrates the Mell Stream and associated ravine into the development scheme. No modifications are proposed that affect this natural feature. A buffer zone of 20m has been applied to Mell Stream measured from the bank of the stream. The landscape scheme prepared by NMP includes native planting and a pollinator plan is detailed in the Landscape Design Statement under separate cover.
	NBG 49	To require the integration of green infrastructure and inclusion of native planting schemes in all development proposals in landscaped areas, open spaces and areas of public space.
		The permitted SHD integrates the Mell Stream and associated ravine into the development scheme. No modifications are proposed that affect this natural feature. The landscape design statement prepared by NMP and submitted under separate cover details soft landscape materials at Appendix 2 together with a pollinator plan at Appendix 1.

Topic	Objective	Objective - Text
	Reference	
	NBG 51	To require the integration of climate change mitigation measures in any future spatial plans and climate change adaptation measures in proposed developments.
		Climate change mitigation measures have already been applied to the approved SHD. All housing will be constructed to the latest building regulation standards with regard to heating and insulation. Please refer to the Energy Efficiency and Climate Change Adaptation Design Statement by Waterman Moylan under separate cover for further details.
	NBG 57	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 20m buffer zone is maintained from the bank of the Mell Stream as permitted under ABP-311678-21. There will be no change to this areas as a result of the proposed modifications.
Built Heritage and Culture	BHC 3	To protect known and unknown archaeological areas, sites, monuments, structures and objects, having regard to the advice of the National Monuments Services of the Department of Housing, Local Government and Heritage.
		The SHD site underwent test trenching during the preparation of the SHD planning application. Test trenches were undertaken in 30 locations; however no archaeology was found during test trenching. One archaeological feature was discovered in the form of an earth-cut enclosure ditch. Full archaeological excavation of the earth-cut enclosure ditch will be undertaken prior to construction works by a suitably qualified archaeologist as recommended by the Department. As required by Condition No. 7 (b) Archaeological Projects Ltd have been appointed by the applicant and developer Lagan Homes Ltd to monitor all site investigations and other excavation works.

Topic	Objective	Objective - Text
	Reference	
Built Heritage and Culture	BHC 10	To require, as part of the development management process, archaeological impact assessments, geophysical surveys, test excavations and monitoring, as appropriate, where development proposals involve ground clearance of more than half a hectare or for linear developments over one kilometre in length or for developments in proximity to areas with a density of known archaeological monuments and history of discovery, as identified by a licensed archaeologist.
		The SHD site has already undergone archaeological impact assessment as detailed above.
	BHC 13	To seek to protect historic and archaeological landscapes including battlefields, from inappropriate development.
		The site of the permitted SHD falls within an area outlined by Map 9.1 of the LCDP as a battlefield site. This was considered as part of the assessment of the SHD as detailed in the Inspectors Report. Section 11.2.9 of the Inspector's Report states "I am satisfied that the submitted Archaeological Impact Assessment has given sufficient consideration and weight to the location of the site relative to the Battle of The Boyne". Test trenches were undertaken in 30 locations on site and there were no historical archaeological findings or features associated with the Battle discovered.
Infrastructure & Public Utilities	IU 6	To require all new developments connect to the public supply where public water and wastewater infrastructure is available or likely to be available and which has sufficient capacity
Othlities		The permitted SHD and proposed development has Confirmation of Feasibility and design acceptance from Irish Water to connect to the public water and wastewater infrastructure. Please refer to the Engineering Assessment Report under separate cover.
	IU 19	To require the use of Sustainable Drainage Systems to minimise and limit the extent of hard surfacing and paving and require the use of SuDS measures be incorporated in all new development (including extensions to existing developments). All development proposals shall be accompanied by a comprehensive SuDS assessment including run-off quantity, run off quality and impacts on habitat and water quality.

Topic	Objective	Objective - Text
	Reference	
		The permitted SHD includes a SUDs strategy. The strategy for the site has not changed as a result of the proposed modifications. Drawings of the modified surface water drainage network on site have been prepared with further details provided within the Engineer's Assessment Report by Waterman Moylan Consulting Engineers under separate cover.
Infrastructure & Public	IU 20	To require all development proposals meet the design criteria, (adjusted to reflect local conditions), and material designs contained in the Greater Dublin Strategic Drainage Study (GDSDS) and demonstrate how runoff is captured as close to source as possible with subsequent slow release to the drainage system and watercourse.
Utilities		This objective has been met by the permitted SHD. Updated details are provided within the Engineer's Assessment Report by Waterman Moylan Consulting Engineers under separate cover.
	IU 22	To ensure all new development incorporates appropriate measures to protect existing water bodies, through appropriate treatment of runoff. In particular, discharges from car parks shall be appropriately treated so as to remove pollutant materials.
		The SUDs strategy as permitted includes pre-treatment of surface water before discharge to Mell Stream and greenfield rate.
	IU 23	To ensure all new developments provide for separated drainage systems.
		The permitted SHD provides separated drainage systems. Drawings of the modified drainage network on site as a result of the proposed modifications have been prepared with further details provided within the Engineer's Assessment Report by Waterman Moylan Consulting Engineers under separate cover.
	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.

Topic	Objective	Objective - Text								
	Reference									
		This will be complied with. A preliminary Construction, Demolition and Waste management plan has been prepared by Waterman								
		Moylan Consulting Engineers and is enclosed under separate cover.								
	IU 26	To reduce the risk of new development being affected by possible future flooding by:								
		Avoiding development in areas at risk of flooding and								
		Where development in floodplains cannot be avoided, taking a sequential approach to flood risk management based on								
Infrastructure		avoidance, reduction and adaptation to the risk.								
& Public		The permitted SHD was subject to a site specific flood risk assessment. Waterman Moylan have prepared a Flood Risk Assessment to								
Utilities		accompany this planning application available under separate cover. The subject site is located within Flood Zone C.								
	IU 27	To ensure all proposals for development falling within Flood Zones A or B are consistent with the "The Planning System and Flood Risk								
		Management –								
		Guidelines for Planning Authorities" 2009. Proposals for development identified as being vulnerable to flooding must be supported by a								
		site specific Flood Risk Assessment and demonstrate to the satisfaction of the Planning Authority that the development and its								
		infrastructure will avoid significant risks of flooding and not exacerbate flooding elsewhere.								
		In Flood Zone C, where the probability of flooding is low (less than 0.1%), site-specific Flood Risk Assessment may be required and the								
		developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed.								
		The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective								
		applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council.								

Topic	Objective	Objective - Text							
	Reference								
		Applications for development in flood vulnerable zones, including those at risk under the OPW's Mid-Range Future Scenario, shall provide details of structural and non-structural risk management measures, such as those relating to floor levels, internal layout, flood-resilient construction, emergency response planning and access and egress during flood events.							
		The permitted SHD was subject to a site specific flood risk assessment. A flood risk assessment prepared by Waterman Moylan Consulting Engineers accompanies this planning application under separate cover.							
	IU 33	Where a portion of a site is at risk of flooding, the lands at risk will be subject to the sequential approach to ensure first and foremost the new development is directed towards lands at low risk of flooding; and to restrict the type of development to that 'appropriate' to each flood zone in accordance with Tables 3.1 and 3.2 of the Flood Risk Management Guidelines.							
Infrastructure		The area of the proposed modifications is not subject to flooding.							
& Public Utilities	IU 40	To require open access ducting for new developments is made available to all service providers on a non-exclusive lease basis at an economic cost.							
		This policy objective will be implemented on site.							
	IU 66	To encourage and support the development and promote the use of heat pumps for heating domestic, commercial and recreational buildings and water subject to normal planning and environmental considerations.							
		It is proposed to use heat pumps within the development. An Energy Statement prepared by Waterman Moylan Consulting Engineers detailing the proposal for domestic heating is submitted under separate cover.							
	IU 76	To require that in all new developments, local services such as electricity be undergrounded where possible and appropriate.							
		This policy objective will be implemented on site. Site development works include undergrounding of existing ESB overhead lines.							

Topic	Objective	Objective - Text
	Reference	
	IU 81	To require the under-grounding of electrical cables within new residential, commercial or civic developments. Where existing, and proposed high voltage lines traverse new residential, commercial or civic developments, these should be re-located under-ground where technically feasible.
		This policy objective will be implemented on site.
	IU 82	To require in all new developments, that multiple services are accommodated in shared strips underground and that access covers are shared, whenever possible.
		This policy objective will be implemented on site whenever possible.
	IU 85	To ensure that all new buildings in the County achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD) and having regard to the Guidelines for Sustainable Design and Energy Efficiency in Buildings.
		The permitted and proposed housing will be constructed in line with the most recent building regulations. An Energy Statement prepared by Waterman Moylan Consulting Engineers is submitted under separate cover and a building lifecycle report has been prepared by JFOC Architects.
Infrastructure & Public Utilities	IU 89	To support the recycling of building materials on development sites subject to compliance with environmental and building control legislation.
Othices		A preliminary Construction, demolition and waste management plan is submitted under separate cover including on-site construction waste management. The main contractor will be encouraged to reuse and recycle any waste materials possible including use of excess excavations as fill materials.

Topic	Objective	Objective - Text
	Reference	
	IU 90	To support and promote structural materials in the construction industry that have low to zero embodied energy and CO2 emissions as assessed across the whole life of the building.
		An Energy Statement prepared by Waterman Moylan Consulting Engineers is submitted under separate cover outlines possible ways of reducing embodied energy.
	IU 91	To encourage and support the utilisation of siting and landscape design features to minimise energy requirements.
		The proposed modifications will enable the majority of housing to be on an east-west access, avoiding north facing gardens. All homes will be dual aspect. Access to daylight and sunlight will assist in minimising energy requirements.
Environment & Natural Resources	ENV 6	To implement the Louth County Council Noise Action Plan 2018-2023 (and any subsequent Plan) in order to avoid, prevent and reduce the harmful effects, including annoyance, due to environmental noise exposure.
	ENV 7	To require that where new development is proposed within the limits of the noise maps for the designated sections of roads in the County, appropriate mitigation measures are undertaken so as to prevent harmful effects from environmental noise.
		The application site falls within the limits of the noise map for the M1 Motorway. An acoustic design statement was prepared for the permitted SHD by Amplitude Acoustics with mitigation measures for the development as permitted. Due to the modifications proposed which include alterations to the site layout plan and introduction of new house types, Amplitude Acoustics have undertaken a new noise impact assessment for the SHD with modifications proposed in place to ensure appropriate mitigation measures are implemented and an appropriate level of residential amenity is achieved both within houses and within outdoor private open space/gardens.

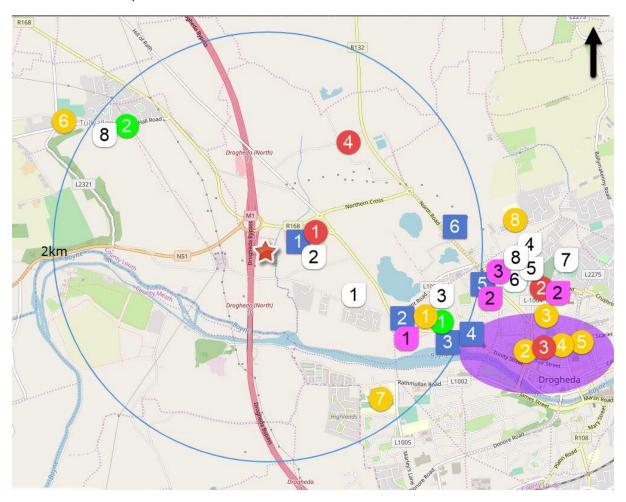
Topic	Objective	Objective - Text
	Reference	
	ENV 8	To ensure that all external lighting whether free standing or attached to a building shall be designed and constructed so as not to cause
		excessive light spillage, glare, or dazzle motorists, and thereby limiting light pollution into the surrounding environment and protecting
		the amenities of nearby properties, traffic and wildlife.
Environment &		The planning application is accompanied by a public lighting plan that takes this policy into account.
Natural Resources	ENV 9	To require all details of on-site lighting associated with all future development are submitted to and agreed with the planning authority.
		A public lighting report and associated drawings are submitted with this planning application under separate cover.
	ENV 10	To promote the use of low energy LED (or equivalent) lighting in support of Climate Action.
		Please refer to the Outdoor Lighting Report prepared by Sabre Electrical Services provided under separate cover for details of lighting
		proposed.
	ENV 11	To implement a hierarchy of light intensity zones as required in development schemes to ensure that environmental impact is minimised
		as far as possible particularly in areas proximate to ecological corridors.
		The planning application is accompanied by an outdoor lighting plan that takes this policy into account.
	ENV 13	To ensure the implementation of the specific guidance on radon prevention measures for new homes as contained within the existing
		Building Regulations including any updated/ superseding regulations.
		All relevant Building Regulations will be complied with.

Lagan Homes Tullyallen Ltd – Old Slane Road, Mell/Tullyallen, Drogheda, Co.Louth LRD Planning Application – Modifications to Permitted SHD ABP-311678-21 Statement of Consistency

Topic	Objective	Objective - Text
	Reference	
Climate Action	CA 3	Actively implement policies that support and encourage sustainable compact growth and settlement patterns, integrate land use and transportation, and maximise opportunities through development location, form, layout and design to secure climate resilience and reduce carbon dioxide and greenhouse emissions.
		The efficient development of the permitted SHD using the most up to date buildings regulations and development management criteria will assist the achievement of policy CA3.
		of the LCDP details Policy Objectives that will assist in achieving the target set by the Climate Action Plan 2019. As detailed above, the evelopment and proposed modifications will support these policy objectives.

Lagan Homes Tullyallen Ltd – Old Slane Road, Mell/Tullyallen, Drogheda, Co.Louth
LRD Planning Application – Modifications to Permitted SHD ABP-311678-21
Statement of Consistency

APPENDIX C SOCIAL INFRASTRUCTURE AUDIT





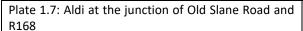




Plate 1.8: M1 Retail Park to the east of the site

	Employment A	reas in _I	proximity to the applic	cation site				
1	M1 Retail Park		2	Our Lady of Lourdes Hospital				
3	Town Centre		4	IDA Business Park				
			Retail	1				
1	M1 Retail Park							
_								
	Lidl Supermarket Costs	•	Woodies Power City	Western Motors Talining				
	Costa Subway	•	Power City Equipet	EZ Living Toolfix				
	Subway Supermacs	•	Smyths Toy Store	Dealz				
	Best Drive Car Servicing	•	Energie Fitness	Choice Homestore				
	Best Brive cur servicing		Club	enoice fromestore				
	Sports Direct	•	BMW Car Sales	Toyota Car Sales				
2	Aldi		3	Circle K/Centra				
4	Mini-supermarket/Local Shop		5	Circle K/Butchers Shop				
6	Wogans Hardware Store		7	Tullyallen Neighbourhood Centre				
		Med	dical Services	1				
1	Ardmell doctor's clinic		2	Pharmacy				
3	Our Lady of Lourdes Hospital		4	Cross Lanes – Doctors Clinics/Pharmacy and other medical related services				
5	Tullyallen doctor's clinic and pharmacy							
		Sports	and Recreation	1				
1	St.Oliver Plunket GAA Sports Ground		5	Drogheda United Football Club Grounds				
2	Gym with Swimming Pool		6	O'Raghallaighs Gaelic Football Club				
3	Pitch and Putt		7	Running Track				
4	Boxing Club		8	Reserve Defence Force/Special Olympics				
		ı	Education					
1	Mell National School		5	St. Josephs				
2	Bolton Street		6	Tullyallen National School				
3	Bothar Bruagh		7	St. Olivers Secondary School				
4	Scoil Aonghusa		8	Drogheda Institute of Further Education				
			Childcare	1				
1	Mell		2	Tullyallen				
*	Application Site			Drogheda Town Centre				
_								

Lagan Homes Tullyallen Ltd – Old Slane Road, Mell/Tullyallen, Drogheda, Co.Louth LRD Planning Application – Modifications to Permitted SHD ABP-311678-21 Statement of Consistency

APPENDIX D SCHEDULE OF ACCOMODATION AND HOUSING QUALITY ASSESSMENT BY JFOC

Client:





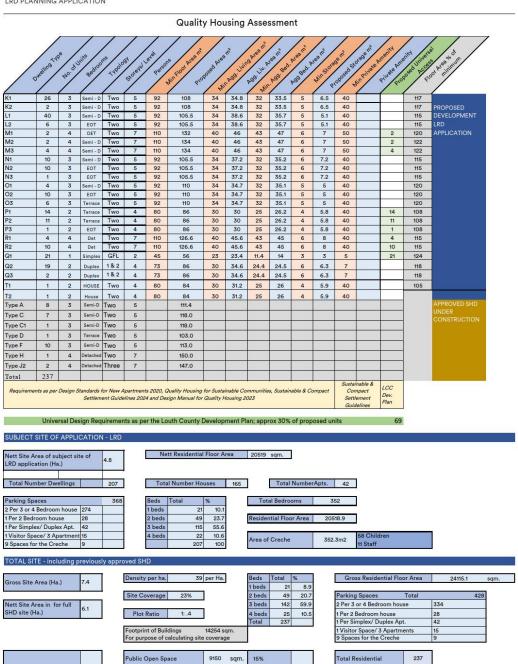
Lagan Homes Tullyallen Ltd.

Project: Proposed residential development at

Gort Mell, Old Slane Road, Drogheda,

Pro. No. 22.127 Date: 3rd May 2024

LRD PLANNING APPLICATION



Units 3 and 4 Greenmount House, Harold's Cross, Dublin 6w Tel: + 353 1 453 0277

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Pro. No.



Project: Proposed residential development at Gort Mell, Old Slane

Road, Drogheda, Co. Louth.

Client: Lagan Homes Tullyallen Ltd.

Date: 1st May 2024

LRD PLANNING APPLICATION

Schedule of Accomodation

Dwelling Number	Dwelling Type	Dwelling Typology	Aspect	Bedrooms	Number of Designated Car-Parking Spaces	20 20 04	Location of 2nd Designated Car Parking Space	LCC Car Parking Provision (MAXIMUM)	Number of Bicycle Spaces (minimum)	Location of Bicycle Spaces	Location of Bin Store	Min Private Amenity (SCSG)	Private Amenity Space	
31	L1	Semi-Detached		3	2		In-Curtilage	2	3	Rear Garden	Rear Garden	40	44	
32	P2	Mid-Terrace	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	30	36	
33	P2	Mid-Terrace	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	30	36	
34	P3	End of Terrace	Dual	2	1	On-Street		2	2	Rear Garden	Rear Garden	30	34	
35	T2	Semi-Detached	Triple	2	1	On-Street		2	2	Rear Garden	Rear Garden	30	36	
36	T1	Semi-Detached	Dual	2	1	On-Street		2	2	Rear Garden	Rear Garden	30	35	
37	N2	End of Terrace	Dual	3	2	On-Street	On-Street	2	3	Rear Garden	Rear Garden	40	54	
38	P2	Mid-Terrace	Dual	2	1	On-Street		2	2	Rear Garden	Secure Bin Storage	30	41	
39	P2	Mid-Terrace	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	30	35	
40	P2	Mid-Terrace	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	30	30	
41	P2	Mid-Terrace	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	30	31	_
42	P2	Mid-Terrace	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	30	30	2
43	P2	Mid-Terrace	Dual	2	.1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	30	34	S
44	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	64	Subject site
45	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	56	ct s
46	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	38	ite
47	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	38	of A
48	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	38	뭗
49	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	38	Application
50	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	46	9
51	Creche							9					163	
52	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	46	
53	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	61	
54	L1	Semi-Detached	Triple	3	2	In-Curtilage	On-Street	2	3	Rear Garden	Rear Garden	40	98	
55	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	50	
56	P2	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bianala Chann	Secure Bin	30	45	
57	P2	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure	Storage Secure Bin	30	49	
58	P2	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure	Storage Secure Bin	30	53	
59	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Bicycle Store Rear Garden	Storage Rear Garden	40	77	
60	M1	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	120	
61	M1	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	55	
62	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	59	
63	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure	Secure Bin	30	42	
64	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Bicycle Store Secure	Storage Secure Bin	30	41	
										Bicycle Store	Storage			

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Dwelling Number	Dwelling Type	Dwelling Typology	Aspect	Bedrooms	Number of Designated Car-Parking Spaces	Location of Designated Car Parking Space	Location of 2nd Designated Car Parking Space	LCC Car Parking Provision (MAXIMUM)	Number of Bicycle Spaces (minimum)	Location of Bicycle Spaces	Location of Bin Store	Min Private Amenity (SCSG)	Private Amenity Space	
65	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	40	
66	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	39	
67	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	38	-
68	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	38	
69	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	64	
70	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	54	
71	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	50	_
72	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	51	20
73	P1	Mid-Terrace	Dual	2	1	In-Curtilage		2	2	Secure Bicycle Store	Secure Bin Storage	30	49	-S
74	N2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	69	ubje
75	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	et s
76	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	52	ite
77	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	64	of A
78	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	63	LRD - Subject site of Application
79	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	63	icat
80	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	47	ion
81	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	60	
82	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	52	
83	R1	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	73	-
84	R1	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	76	
85	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	55	
86	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	45	
87	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	51	4
88	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	51	
89	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	48	4
90	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	51	
91	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	60	4
92	N3	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	59	
93	O2	End of Terrace	Dual	3	2	On-Street	On-Street	2	3	Rear Garden	Rear Garden	40	52	-
94	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	54	
95	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	54	-
96	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	54	
97	O3	Mid-Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Secure	Secure Bin	40	47	
98	O2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Bicycle Store Rear Garden	Storage Rear Garden	40	49	
99	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	54	
100	N1	Semi-Detached		3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	54	
101	L2	Semi-Detached		3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	59	4
102	O2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	
103	03	Mid-Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Secure	Secure Bin	40	48	
103	U3	Iviid-Terrace	Duai	3		in-Curtilage	m-curmage	-	3	Bicycle Store	Storage	40	40	

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Dwelling Number	Dwelling Type	Dwelling Typology	Aspect	Bedrooms	Number of Designated Car-Parking Spaces	Location of Designated Car Parking Space	Location of 2nd Designated Car Parking Space	LCC Car Parking Provision (MAXIMUM)	Number of Bicycle Spaces (minimum)	Location of Bicycle Spaces	Location of Bin Store	Min Private Amenity (SCSG)	Private Amenity Space	
104	L2	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	
105	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	59	
106	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	57	
107	O2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	50	1
108	O2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	50	
109	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	59	
110	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	58	
111	L2	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	
112	O3	Mid-Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Secure Bicycle Store	Secure Bin Storage	40	48	
113	O3	Mid-Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Secure Bicycle Store	Secure Bin Storage	40	48	
114	L2	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	ı
115	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	59	
116	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	57	
117	O2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	
118	O2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	50	1
119	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	54	
120	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	58	ı
121	L2	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	
122	03	Mid-Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Secure Bicycle Store	Secure Bin Storage	40	48	1
123	O2	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	52	
124	L2	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	
125	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	59	1
126	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	58	1
127	02	End of Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	46	
128	O3	Mid-Terrace	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Secure Bicycle Store	Secure Bin Storage	40	44	
129	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	51	1
130	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	64	
131	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	İ,
132	O2	End of Terrace	Dual	3	2	On-Street	On-Street	2	3	Rear Garden	Rear Garden	40	53	-RD - Subjec
133	01	Semi-Detached	Dual	3	2	On-Street	On-Street	2	3	Rear Garden	Rear Garden	40	50	- 5
134	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	54	Jbje
135	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	68	
136	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	76	ite
137	01	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	Y A
138	01	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	49	t site of Application
139	R2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	59	cati
140	N1	Semi-Detached	Dual	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	58	S
141	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	50	
142	01	Semi-Detached	Dual	3	2	On-Street	On-Street	2	3	Rear Garden	Rear Garden	40	48	

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Dwelling Number	Dwelling Type	Dwelling Typology	Aspect	Bedrooms	Number of Designated Car-Parking Spaces	Location of Designated Car Parking Space	Location of 2nd Designated Car Parking Space	LCC Car Parking Provision (MAXIMUM)	Number of Bicycle Spaces (minimum)	Location of Bicycle Spaces	_ocation of Bin Store	Min Private Amenity (SCSG)	Private Amenity Space	
143	Q1	GF Simplex	Dual	1	1	On-Street		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
144	Q1	GF Simplex	Dual	1	1	On-Street		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
145	Q1	GF Simplex	Dual	1	1	On-Street		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
146	Q1	GF Simplex	Dual	1	1	On-Street		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
147	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
148	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
149	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
150	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
151	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
152	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
153	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
154	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
155	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
156	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
157	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
158	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
159	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
160	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
161	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	⊑
162	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	8
163	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	-Su
164	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	bjec
165	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	t si
166	Q3	1F Duplex	Triple	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	 Subject site of Application
167	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	β
168	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	plic
169	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	atic
170	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	ă
171	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
172	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
173	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
174		GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
175	Q1	GF Simplex	Dual	1	1	In-Curtilage		2	1	Secure Bicycle Store	Secure Bin Storage	5	7	
176	Q3	1F Duplex	Triple	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
177	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
178	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
179	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
180	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
181	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	

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Dwelling Number	Dwelling Type	Dwelling Typology	Aspect	Bedrooms	Number of Designated Car-Parking Spaces	Location of Designated Car Parking Space	Location of 2nd Designated Car Parking Space	LCC Car Parking Provision (MAXIMUM)	Number of Bicycle Spaces (minimum)	Location of Bicycle Spaces	Location of Bin Store	Min Private Amenity (SCSG)	Private Amenity Space	
182	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
183	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
184	Q2	1F Duplex	Dual	2	1	On-Street		2	2	Secure Bicycle Store	Secure Bin Storage	7	7.5	
185	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	52	
186	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	51	
187	M3	Semi-Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	77	
188	M3	Semi-Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	94	П
189	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	67	
190	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	72	Н
191	M3	Semi-Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	81	
192	МЗ	Semi-Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	115	FB
193	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	74	
194	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	68	ğ.
195	M2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	77	- Subject site of Application
196	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	52	site
197	K2	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	52	ġ,
198	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	50	App
199	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	53	ica
200	M2	Detached	Triple	4	2	In-Curtilage	In-Curtilage	2	4	Rear Garden	Rear Garden	50	77	Ė
201	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	56	_
202	K1			3	2			2	3			40	52	
		Semi-Detached	Triple		2	In-Curtilage	In-Curtilage	2		Rear Garden	Rear Garden		84	
203	L1	Semi-Detached	Triple	3		In-Curtilage	In-Curtilage		3	Rear Garden	Rear Garden	40		
204	L1	Semi-Detached	ď	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	106	
205	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	60	
206	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	55	
207	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	71	
208	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	76	
209	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	59	
210	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	59	
211	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	50	
212	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	45	
213	K2	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	46	
214	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	54	
215	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	56	
216	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	52	
217	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	64	
218	K1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	54	
219	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	51	
220	L1	Semi-Detached	Triple	3	2	In-Curtilage	In-Curtilage	2	3	Rear Garden	Rear Garden	40	64	

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JFOC Number of Designated Car-Parking Spaces Dwelling Typology **Dwelling** Number ocation of esignated ar Parking Space signated Parking Space 222 In-Curtilage In-Curtilage Rear Garden 40 223 L1 In-Curtilage n-Curtilage Rear Garden Rear Garden 56 4 In-Curtilage In-Curtilage 4 Rear Garden Rear Garden 63 226 R1 Detached Triple 2 50 In-Curtilage 55 229 L1 Triple 3 2 In-Curtilage In-Curtilage 3 Rear Garden Rear Garden 40 64 230 In-Curtilage In-Curtilage 60 Triple Rear Garden Rear Garden 232 In-Curtilage In-Curtilage Rear Garden 40 In-Curtilage 40 40 40 60 236 In-Curtilage In-Curtilage Rear Garden Rear Garden L1 Triple In-Curtilage In-Curtilage Rear Garden Rear Garden 52

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