

# STATEMENT OF CONSISTENCY & PLANNING REPORT

LARGE-SCALE RESIDENTIAL DEVELOPMENT PLANNING APPLICATION

LANDS TO THE EAST OF THE M1 MOTORWAY AND WEST OF THE RATHMULLAN ROAD, OLDBRIDGE, DROGHEDA, CO. MEATH

SUBMITTED IN SEPTEMBER 2025 ON BEHALF OF: Earlsfort Developments Drogheda Limited

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#### 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this Statement of Consistency and Planning Report on behalf of our clients, Earlsfort Developments Drogheda Limited, to accompany this application submission to Meath County Council for a proposed Large-Scale Residential Development (LRD) at Lands to the east of the M1 motorway and west of the Rathmullan Road, Oldbridge, Drogheda, Co. Meath.

The purpose of this report is to provide background information on the site and its history, a description of the proposed development, and to outline the planning rationale and justification for the proposed development having regard to the relevant national, regional and local planning policy context. The detailed description of development, as comprised within the statutory public notice wording is as follows:

(i) demolition/removal of all existing farm buildings/structures and associated hard standing on site; (ii) construction of a large-scale residential development (LRD) of 249 no. units comprising 170 no. two-storey houses (including 37 no. two-bedroom houses, 111 no. three-bedroom houses and 22 no. four-bedroom houses), 16 no. three-storey duplex buildings (accommodating 16 no. one-bedroom and 16 no. two-bedroom units) and a mix of 8 no. three-storey and 3 no. four-storey apartments blocks accommodating a total of 22 no. one-bedroom and 25 no. two-bedroom apartments); (iii) construction of a new vehicular entrance and access road off Rathmullan Road with associated junction works and associated internal access road network with pedestrian and cyclist infrastructure; (iv) provision of a three-storey creche facility (411sq.m) with external play areas at ground and second floor levels and vehicular/bicycle parking area; and, (v) all ancillary site and infrastructural works, inclusive of removal of existing vehicular entrances, general landscaping and public open space provision, vehicular parking provision (396 no. spaces in total), bicycle parking, boundary treatments, foul/surface water drainage, attenuation areas, provision of a pumping station and provision of an ESB substation, as necessary to facilitate the proposed development. Each house will be served by vehicular parking to the front and private amenity space in the form of a rear garden. Each duplex building will be served by vehicular parking to the front and private amenity space in the form of balcony/terrace spaces to the rear. Each apartment block will have shared access to adjoining car parking bays with communal amenity space and bicycle/bin stores provided to the rear and each apartment will be provided with private amenity space in the form of a balcony or terrace. The development includes provision of a landscaped area of public open space to the north of the site, with 2 no. pedestrian/cyclist connections (via the northern/eastern site boundaries) to Rathmullan Road which will be subsequently ceded to Meath County Council. The application is accompanied by a Natura Impact Statement (NIS) and an Environmental Impact Assessment Report (EIAR).'

It is submitted that the proposed development accords with the proper planning and sustainable development of the area, provides for a high-quality residential development and accordingly, planning permission should be granted by Meath County Council. The key statistics of the subject proposal are also outlined in the table overleaf for ease of reference:

Key Development Statistics		
Site Area	Red Line Boundary – 9.2 HA	
	Residentially Zoned Area for Der	nsity / POS Calculation – 6.92 HA
Total No. of	249 no.	
Residential Units	Houses - 170 no.	Apartments - 79 no.
Density	36 no. Units Per Hectare	
Building Heights	Two - Four Storey	
Creche	1 no. (411sq.m)	
Public Open Space	1.17 HA – 16.9%	
Car Parking Provision	396 no. car parking spaces (including 8 no. creche spaces)	

This planning report should be read in conjunction with the following reports/plans prepared by the wider Design Team in support of this application:

Consultant	Prepared Document
Hughes Planning and	- Statement of Consistency & Planning Report;
Development Consultants	- Statement of Response to Pre-Application
	Consultation Opinion; - Social Infrastructure Audit
Niall D Brennan Associates	- Social mirastructure Audit - Architectural Drawings and Proposals
Architecture	- Architectural Drawings and Proposals - Architectural Design Statement
Aromeotare	Housing Quality Assessment (HQA)
Waterman Moylan	- Outline Construction Traffic Management Plan
Consulting Engineers	- DMURS Compliance Statement
	- Mobility Management Plan Framework
	<ul> <li>Traffic and Transport Assessment Reports</li> </ul>
	<ul> <li>Response to Opinion (Engineering)</li> </ul>
	<ul> <li>Technical Note – Compliance with Accessibility</li> </ul>
	Requirements
	- Engineering Services Design Report
	- Drainage Drawings
0	- Traffic and Transport Drawings
Cunnane Stratton Reynolds	- Landscape Design Drawings
	<ul> <li>Landscape Design Statement</li> <li>Landscape Management &amp; Maintenance Plan</li> </ul>
	- Landscape Management & Maintenance Flan - Arboricultural Survey
	- Arboncultural Survey - Arboricultural Drawings
Chris Shackleton Consulting	- Visuals (Photomontage & CGI)
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JBA Consulting	- Flood Risk Assessment
DNV	- Environmental Impact Assessment Report (EIAR)
	- Resource Waste Management Plan
	- Operational Waste Management Plan
Verdé Environmental	- Ecological Impact Assessment (EcIA)
Consultants	<ul> <li>Appropriate Assessment Screening Report (AASR)</li> </ul>
	- Natura Impact Statement (NIS)
McElligott Consulting Engineers	<ul> <li>Public Lighting Plan &amp; Report</li> </ul>
	- Energy Efficiency & Sustainability Report
Archaeology and Heritage	<ul> <li>Archaeology &amp; Cultural Heritage Report</li> </ul>
Consultancy Limited	

We note that the proposed development now falls under the definition of a Large-Scale Residential Development (LRD) as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 as it comprises 'the development of 100 or more houses.' As such the applicant submits this Large-Scale Residential (LRD) application to Meath County Council for its assessment.

As per the mandatory steps involved in the LRD process, in advance of lodging this application, the design team have engaged in a Section 247 pre-planning meeting (6<sup>th</sup> November 2024 and a formal Section 32 LRD Meeting (5<sup>th</sup> March 2025) with Meath County Council. The feedback received at these meetings, in conjunction with the assessment of previous planning applications upon the subject site, has informed the scope and contents of this application. In ease of the planning authority, we refer also to the document entitled "Statement of Response to Pre-Application Consultation Opinion" which addresses each specific issue raised in the LRD Opinion dated 1<sup>st</sup> April 2025.

In this context, the proposed development seeks to provide an appropriately scaled residential development, which provides much needed housing that is conducive to modern living standards. Overall, it is submitted that the proposed development accords with the key principles of proper planning and sustainable development and that planning permission should be **granted** by Meath County Council.

# 2.0 Site Description

The subject site extends to 9.2 hectares in size and is located within the southwestern environs of Drogheda, Co. Meath, c.1.7km from the town centre, situated adjacent to the Meath-Louth County Border. The site has road frontage along Rathmullan Road, on the eastern site boundary, which has been improved by the Planning Authority in recent years. The site is situated within approximately 200m of the M1 motorway to the west, and the northern extent of the site is situated between 40-50 metres from the southern bank of the River Boyne, with the site elevated c.10 metres above the riverbank.

The site adjoins a buffer zone which protects the monuments of Newgrange, Knowth and Dowth which make up the Brú na Bóinne World Heritage Site. To the west and south, the application site bounds lands subject to a strategic reserve of zoned lands which are not, at present, available for residential development. The topography of the land is undulating with the site predominantly sloping gently towards the River Boyne, with a steep embankment leading down towards the road which runs alongside the River Boyne. Due to the fall of the land, the site is set above the adjoining M1 Motorway and smaller rural road to the north adjoining the River Boyle.

A strong feature of the site is its proximity to MacBride Train Station, which is located south-east of Drogheda Town Centre, approximately 3.6km from the subject site, offering a high frequency, high-capacity public transport service with direct links to Dublin City Centre. It is also noted that the site is served by Drogheda Bus Station, approximately 2.6km from the subject site. The M1 Motorway, located 2.5km from the site, connects Drogheda to Dublin, while also acting as the primary road connecting Dublin to Belfast. It is considered the subject site is situated within an ideal location for residential development with numerous amenities situated within the wider area. Drogheda Retail Park is situated 2.5km south-east of the site providing access to shopping facilities including Tesco and Aldi, whilst the centre of Drogheda Town provides access to numerous shopping outlets and recreational facilities. As illustrated in the following figures, the site is situated within proximity to a number of existing residential schemes, including Oldbridge Manor, 'Riverbank' and 'Highlands', which together provide a mix of semi-detached/terraced houses and duplex apartments.



Figure 1.0 Aerial view showing the immediate locational context of the subject site (red outline is approximate) with adjoining housing developments at Riverbank (blue fill), Oldbridge Manor (yellow fill) and Highlands (orange fill) identified.



Figure 2.0 Aerial view showing the wider locational context of the subject site (red outline).





Figure 3.0 Imagery of the local roadway and pedestrian infrastructure along the site's north-eastern boundary.

The Rathmullan Road runs along the eastern boundary of the subject site. This roadway was extensively upgraded in recent years, as illustrated overleaf, to include pedestrian and cyclist infrastructure.



Figure 4.0 The Rathmullan Road in 2009



Figure 5.0 The Rathmullan Road in 2009



Figure 6.0 The Rathmullan Road in 2009



Figure 7.0 The Rathmullan Road in 2023.







Figure 8.0 Imagery of the recently constructed development at Oldbridge Manor. The subject site can be seen in the background of these images.

# 3.0 Site Planning History

A review of the Meath County Council Planning Register found several historic applications relating to the subject site. The following subheading provides detail in relation to these applications.

## 3.1 Reg. Ref. SA60260

This application was submitted to Meath County Council on 31st May 2006 and requested permission for the following development:

745 no. residential units comprising as follows;28 no. 4 bed detached houses, 16 no. 5 bed detached houses, 4 no. 2 bed townhouses, 2 no. 3 bed townhouses, 111 no.2 bed terraced houses, 66 no. 3 bed terraced houses, 26 no. 24 bed terraced houses, 41 no. 4 bed semi detached houses, 147 no.3 bed semi-detached houses, 87 no. 2 bed apartments at ground floor level of three storey duplex building, 87 no. 3 bed duplex townhouses, 8 no.1 bed apartments, 122 no.2 bed apartments; associated car-parking spaces (1132no.) at under croft/basement and surface level; provision of a creche (650m2)with associated outdoor play area; a 3.13ha neighbourhood park addressing the River Boyne and a 1.6ha linear park bounding the M1 motorway; related open space and landscape works; traffic and carriageway improvements and reconfiguration to Rathmullen Road and to Sheephaven Road (CR315)including the provision of new vehicular access points to the site at Rathmullen Road (via a new roundabout)and at Sheephaven Road; associated site development and services works including water well compound and secondary borhole facility. All on a site of some 27 hectares.'



Figure 9.0 Site layout plan as submitted at application stage under Reg. Ref. SA60260.

As per the above development description, the development proposed under Reg. Ref. SA60260 was comprised of:

8 no. one-bedroom apartments 209 no. two-bedroom apartments 87 no. three-bedroom duplex unit 141 no. two-bedroom houses 215 no. three-bedroom houses 69 no. four-bedroom houses 16 no. five-bedroom houses 745 no. total residential units

The extent of residential development proposed would be served by 1,132 no. parking spaces at basement/surface level, a creche facility and 4.73 hectares of public open space provided over two large park areas. The scheme would be served by new vehicular access points to Rathmullan Road along with all associated infrastructural improvements. It is noted that following the submission of the application, revisions were made to the proposal on foot of requests for further information and clarification of further information. Following the further information request from Meath County Council, several changes were made to the site layout including:

- The removal of a number of taller apartment buildings;
- Changes to various public open spaces; and
- The reorganisation of the crèche site and its associated access arrangement.

Following the clarification of further information Request from Meath County Council, several further changes were made to the site layout including:

- Changes to various public open spaces; and
- The reorganisation of the crèche site and its associated access arrangement.



Figure 10.0 Site layout plan as submitted in response to a request for further information (I) and following the clarification of further information (r) under Reg. Ref. SA60260. The red shading depicts units omitted to allow for the construction of a national school on-site.

Following the submission of documentation relating to the clarification of further information request, a decision to grant planning permission was issued by Meath County Council on 20<sup>th</sup> July 2007. The decision to grant contained conditions requiring the omission of 34 no. units (683 no. units granted) and reservation of land for a national school.

#### An Bord Pleanála

That grant of permission was subsequently appealed to An Bord Pleanála by third parties, under Ref.: PL 17.224875. Revised plans were submitted as part of a response submission to the third-party appeals. We note the following commentary from the Inspector's Report, dated 13<sup>th</sup> March 2008, in relation to the reservation of land for the purpose of providing a national school on-site:

'Should the Board be minded to grant permission, I recommend that the crèche, together with units 7-25 and 107-121 should be omitted. I note that the terms of Condition 2 of the planning Authority's decision to grant permission also requires the omission of these units. This would allow the applicant to prepare an overall plan which would inform subsequent applications for the crèche, school or residential development, and retail centre'.

Following the recommendation of the Inspector to grant permission, the decision of Meath County Council was upheld by An Bord Pleanála on 31<sup>st</sup> October 2008 with revised conditions. These revised conditions included the following amendments to the proposal as approved by Meath County Council:

- Reduced the development to 556 no. units, comprising 370 no. houses and 186 no. apartment/duplex units;
- The crèche building was omitted from the scheme and a separate application for a crèche requested to be lodged under a separate heading;
- The area occupied by omitted unit Nos. 241-266, 320-367, 483-491, and 505-508 (inclusive) was replaced by an area of public open space; and
- Noise mitigation requirements were set out for houses nearest the M50.

It is noted, with regards to the revised conditions, that the recommendation of the Inspector, in respect of the omission of units 7-25 and 107-121, was not taken up by the Board. Moreover, the conditions outlined in the Board's Order to grant permission, contained no requirement to provide a national school upon the subject site.



Figure 11.0 Site layout plan submitted with response to An Bord Pleanála Ref.: PL 17.224875.

It is noted that the permission approved under Reg. Ref. SA60260 was never enacted and subsequently expired in 2013.

# 3.2 Strategic Housing Development (SHD) Application Reg. Ref. 305552

Application Reg. Ref. 305552 was an application for a Strategic Housing Development (SHD) and, as such, was submitted directly to An Bord Pleanála on 3<sup>rd</sup> October 2019. The application boundary notably included the site of the current proposal within a larger parcel of land extending to the west, south and south-west which are now white lands following their de-zoning under the Meath County Development Plan 2021-2027. The application proposed the following extent of development:

(i) demolition of existing farm buildings/structures (1,160 square metres) on site; (ii) construction of 661 number residential dwellings and a neighbourhood centre adjacent to the site's eastern boundary, consisting of a childcare facility (486 square metres), café (63 square metres) and retail unit (318 square metres); (iii) construction of a four-arm signalised junction and works to Rathmullan Road, including the widening of the existing carriageway to six metres and the provision of a two-metre wide footpath linking the proposed development to the River Boyne Boardwalk; (iv) construction of two number priority junctions (one along the site's eastern boundary to provide access to the neighbourhood centre and one along the site's southern boundary to provide a second access to the development), realignment and upgrade works to the un-named local road along the site frontage to the south of the new signalised junction with Rathmullan Road; (v) construction of a strategic foul water pumping station in the north-eastern corner of the site; and (vi) all associated site, landscaping and infrastructural works, including foul and surface water drainage, attenuation areas, open space areas, boundary walls and fences, internal roads and cycle paths and footpaths.

The 661 number residential dwellings consist of the following: (a) 509 number double storey semi-detached and terraced houses comprising: • 158 number two-bed houses, • 269 number three-bed houses, and • 82 number four-bed houses; and (b) 152 number apartments (in Blocks B1, B2, B3, C, D, E and G which vary from three to five storeys in height) comprising: • 13 number one-bed apartments and • 139 number two-bed apartments. A total of 1,366 number car parking spaces are proposed, including 1,018 number spaces (two number on curtilage spaces per dwelling) serving the proposed dwellings, 195 number spaces serving the proposed apartments; 111 number spaces serving visitors to the development; and 42 number spaces serving the proposed neighbourhood centre. A total of 188 number bicycle parking spaces are proposed, including 154 number spaces serving the proposed apartments and 34 number spaces serving the proposed neighbourhood centre. The development also features 9.15 hectares of public open space, including landscaped play spaces and pocket parks throughout the development and 6.13 hectares of landscaped open space provided adjacent to the Boyne River and M1 motorway frontages.

As per the above description, the development proposed under Reg. Ref. 305552 comprised of:

661 no.	total residential units
82 no.	four-bedroom houses
269 no.	three-bedroom houses
158 no.	two-bedroom houses
139 no.	two-bedroom apartments
13 no.	one-bedroom apartments

The extent of residential development proposed would be served by 1,366 no. parking spaces at basement/surface level, a creche facility, a retail facility and 15.28 hectares of public open space provided primarily in one large linear park and several smaller pocket park areas. The scheme would be served by new vehicular access points to Rathmullan Road along with all associated infrastructural improvements. It is noted, given the process associated with SHD proposals, that there was no opportunity for requests for further information or clarification of further information to issue in respect of the subject application. Notwithstanding this, it is noted that the proposal was subject to extensive preplanning consultation under the SHD process with the submitted proposal considered representative of an appropriate extent of development having evolved over the course of the consultation process.



Figure 12.0 Site layout plan as submitted under Reg. Ref. 305552.

Following the assessment of the subject application by An Bord Pleanála, an Order to grant planning permission was issued on 29<sup>th</sup> January 2020. It is noted that the Board's Order did not compromise the extent of development originally proposed with no conditions attached to the Order which would reduce the number of units or extent of development proposed.

We would note and respond to the positive commentary contained within the Inspector's Report prepared for Reg. Ref. 305552 as follows:

Section 6.5.1 - 'The proposed development would meet the objectives of the National Planning Framework by providing housing near the footprint of the existing town. It does not constitute urban sprawl. It provides a range of building types and heights in line with SPPR 1 of the guidelines on building height. The proposed development will provide a range of housing on a greenfield site beside Drogheda and so would be in keeping with the guidelines on sustainable residential development in urban areas.'

It is considered that, subject to an updated site layout plan which illustrates due regard for the national policy guidance which has been issued in the intervening years, the subject site has been designed to provide an appropriate mix of residential housing types including apartments, duplex units and a variety of terraced and semi-detached houses. As stated above, the development of the subject site to provide residential accommodation would allow for the provision of sustainable residential housing near the footprint of the existing town and would not constitute urban sprawl.

Section 6.6.4 - 'Objective 9 recognises the potential for significant growth in some settlements subject to adequate infrastructure and amenities and employment to support such growth. The lands at Rathmullan provide an opportunity for such compact growth over a 10 year period in line with employment growth in the town including on the lands zoned for that to its south. The lands are on the M1 transport corridor. The proposed development will constitute an urban area comprising a high standard of design and ensuring a liveable and attractive environment for future residents in line with objective 4. It would provide a high standard of pedestrian and cycle permeability and linkage in line with objective 27. The council recognised the potential for employment growth in the southern environs in its submission and so the proposed residential development there would support a balance of uses that reduced the demand for long distance commuting.'

It is considered that the subject site remains appropriately situated to accommodate a significant extent of residential accommodation proximate to the existing built footprint of Drogheda and the services available within the wider environs of the town. The subject site is situated at a key juncture between local and national transport infrastructure and can contribute to the further improvement of local transport infrastructure. Moreover, the subject site is of appropriate size to provide high-quality residential units and ensuring a liveable and attractive environment for future residents within proximity to employment areas within Drogheda and its southern environs.

Section 10.1.7 - 'The housing would be set back from the part of the site closest to the SAC at the Rivers Boyne and Blackwater with open space in between that would retain the linear woodland that faces the boundary with the SAC. The proposed development would not be likely to cause significant disturbance to the habitats and species in that SAC therefore. The foul effluent from the occupation of the houses would drain to the system serving Drogheda as a whole. Irish Water have reported that this system can facilitate the proposed development. Surface water runoff from the completed development would be attenuated to replicate the existing discharge regime with petrol interceptors that would prevent hydrocarbons being emitted at the outfall on a watercourse that drains to the Boyne within the SAC. The occupation of the proposed development is not likely therefore to have a significant effect on water quality in the Boyne or on Natura 2000 sites, therefore.'

The subject site, given its unique position close to an SAC, has been extensively monitored in recent years to ensure future development at this location does not present any undue impact to the natural environment, either by way of habitat disruption or associated impacts from the construction of a residential development.

It is noted that the Board's Order to grant permission for the SHD application challenged by way of judicial review by the Highlands Residents Association and Protect East Meath Limited. These proceedings ultimately resulted in the quashing of the Board Order to grant permission in the judgment of McDonald J. in *Highland Residents v. An Bord Pleanála* [2020] IEHC 622

It is noted that the applicants in those proceedings challenged ABP's decision on 11 separate grounds and that relief was granted on only three of those grounds:

- 1. ABP breached section 9(6)(b) of the Planning and Development (Residential Tenancies) Act 2016 (the "2016 Act") in granting permission in contravention of the Meath County Development Plan 2013-2019 and/or the Local Area Plan for the Southern Environs of Drogheda and in particular the prohibition under CS OBJ 6 and SP1 of the County Meath Development Plan 2013-2019 (2CDP) on granting planning permission in respect of that part of the development site identified as "Residential Phase II (Post 2019)" in contravention of the zoning of the site of the proposed development;
- 2. ABP erred in law in screening out at Stage 1 of the Screening for Appropriate Assessment process the possibility of significant effects on four identified Natura 2000 sites from silt and pollutants mobilised from the development site;
- 3. ABP erred in law in screening out significant impacts on avi-fauna qualifying interests in respect of ex situ impacts on the Boyne Estuary SPA in breach of the requirements of the Habitats Directive.

It is noted that following the quashing of the ABP Order on Reg. Ref. 305552, a further judicial review was lodged by Protect East Meath Limited against the decision of Meath County Council to adopt the Meath County Development Plan 2022 – 2027 (the "Development Plan") in respect of the A2 zoned lands to the south of Drogheda. Protect East Meath Limited sought:

- 1. An order for certiorari for inter alia that the council acted unlawfully by zoning significantly more land for housing in the southern environs of Drogheda; and
- 2. A declaration that the Council, in adopting the Development Plan failed to conduct a valid Strategic Environmental Assessment.

The High Court (Humphreys J). granted an Order of Certiorari quashing the zoning of the lands in the southern environs of Drogheda which were previously zoned A2 – Residential Phase 2 in the old County Development Plan in *Protect East Meath v. Meath County Council* [2023] IEHC 69. The basis for the court's decision was a finding that the quantum of residentially zoned lands in the southern environs of Drogheda did not bear a reasonable relationship to the population provision for that settlement, contrary to s.10(2A)(f)(v) of the Planning and Development Act 2000. By zoning all the previously zoned Residential Phase II lands, as Residential *simpliciter* (A2) the court found that Meath County Council had not adhered to its duty in this regard.

As can be seen from the zoning maps submitted with his application, the previously Phase II-zoned lands are now zoned WL – White Lands. None of the previously Phase II-zoned lands at issue in the *Protect East Meath* proceedings are included in this application which is confined the proposed residential development to lands which still hold an A2 Residential zoning in the Meath County Development Plan 2021-2027.

The Order for Certiorari was made without prejudice to Meath County Council adopting a compliant local area plan, joint urban area plan or variation of the Development Plan. The court further put a stay on current or future planning applications or appeals that are affected by the Order of Certiorari until a variation of the Development Plan is made. As the lands at issue in this application were not affected by the court's decision in *Protect East Meath*, the judgment has no direct bearing on the planning considerations at issue in the application. The above is included to give accurate context to the circumstances in which the application arises and to illustrate why the previously Phase II-zoned lands to the south of the proposed development which were included in previous applications are not included in this application.

# 3.3 2023 Planning Applications

It is noted that two planning applications were submitted to Meath County Council by Trailford Ltd in 2023 in respect of development proposals for the area of land which is the subject of the current planning application for a large scale residential development. We note the wording of these applications as follows:

Reg. Ref. 23500

(i) construction of a residential development comprising 85 no. houses (6 no. two-bedroom houses, 53 no. three-bedroom houses and 26 no. four-bedroom houses) and 2 no. three-storey apartment blocks (Blocks G & H) comprising 6 no. apartments (2 no. one-bedroom apartments and 4 no. two-bedroom

apartments) and an ancillary creche facility (100 sq.m) with external play area, (ii) construction of a new vehicular access road off Rathmullan Road with associated junction works and associated internal access road network with pedestrian and cyclist infrastructure and (iii) all ancillary site and infrastructural works inclusive of landscaped public open space area to the north of the site to be ceded to Meath County Council, general landscaping and public open space provision, boundary treatments, foul/surface water drainage, attenuation areas, pumpling station, removal of existing vehicular entrances and provision of visitor car parking bay (4 no. spaces) necessary to facilitate the proposed development. Each house will be served by on-curtilage vehicular parking to the front and private amenity space in the form of a rear garden. Each apartment block will have shared access to adjoining bin stores, car parking bays (9 no. car parking spaces per block) and bicycle parking bays (12 no. bicycle parking spaces per block) and each apartment will be provided with private amentity space in the form of a balcony. This application is accompanied by a Natura Impact Statement. This application represents Phase 1 of a two-phase development

Reg. Ref. 23542

(i) demolition/removal of all existing farm buildings/structures (315sq.m) on site (ii) construction of a residential development comprising 80 no. houses (12 no. two-bedroom houses, 55 no. three-bedroom houses and 13 no. four-bedroom houses) and 2 no. three storey apartment blocks comprising 8 no. apartments (4 no. one-bedroom apartments and 4 no. two-bedroom apartments); (iii) construction of a new vehicular access road off Rathmullan Road, with associated junction works, and associated internal access road network with pedestrian and cyclist infrastructure; and, (iv) all ancillary site and infrastructural works, inclusive of general landscaping and public open space provision, boundary treatments, foul/surface water drainage, attenuation areas, pumping station, removal of existing vehicular entrances and provision of visitor car parking bay (3 no. spaces) necessary to facilitate the proposed development. Each house will be served by on-curtilage vehicular parking to the front and private amenity space in the form of a rear garden. Each apartment block will have shared access to adjoining bin stores, car parking bays (9 no. car parking spaces per block) and bicycle parking bays (14 no. bicycle parking spaces per block) and each apartment will be provided with private amenity space in the form of a balcony. This application is accompanied by a Natura Impact Statement. This application represents Phase 2 of a two-phase development

As per the above development descriptions, the two phases of development cumulatively comprised of:

6 no. one-bedroom apartments 8 no. two-bedroom apartments 18 no. two-bedroom houses 108 no. three-bedroom houses 39 no. four-bedroom houses total residential units

The extent of residential development cumulatively proposed under the above applications would be served by 373 no. parking spaces at surface level, a creche facility and 3.04 hectares of public open space provided primarily in one large linear park with several smaller pocket parks. The scheme would be served by a vehicular entrance off Rathmullan Road and associated infrastructural improvements.

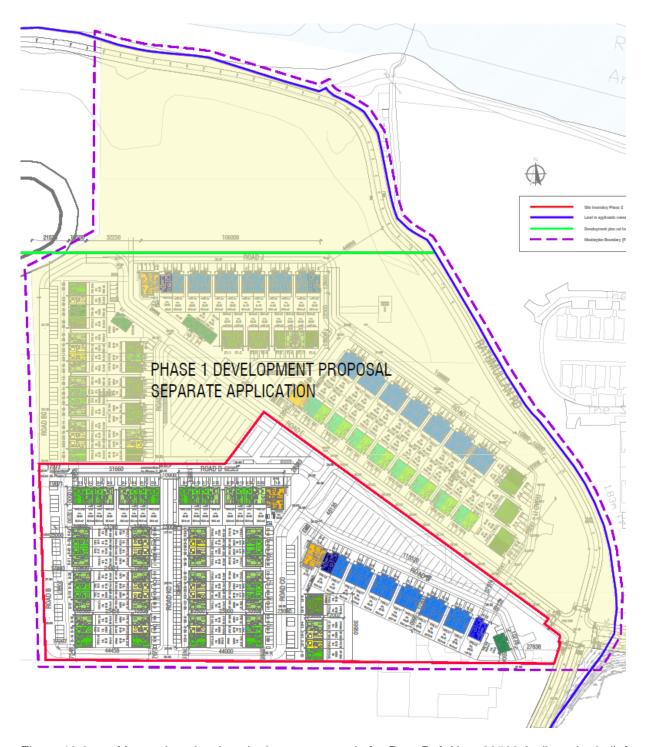


Figure 13.0 Masterplan showing site layout proposals for Reg. Ref. Nos. 23500 (yellow shaded) & 23542 (unshaded).

The applications submitted under Reg. Ref. Nos. 23500 & 23542 each received extensive requests for further information. Given the nature of the further information requests, it was decided not to provide a response to same and, instead, to proceed to prepare a revised proposal as part of a new application for a Large-Scale Residential Development (LRD). The applications were subsequently deemed withdrawn in January 2024 as a result of the decision not to provide a response.

## 3.4 Large-Scale Residential Development (LRD) Application 2023 – Reg. Ref. LRD0022

A Stage 1 pre-planning submission was issued to Meath County Council in September 2023 in respect of an application for a Large-Scale Residential Development (LRD) on the combined lands which were the subject of Reg. Ref. Nos. 23500 & 23542.

The pre-planning submission provided a preliminary description of the extent of development which would be proposed under the LRD application as follows:

(i) construction of a residential development comprising 140 no. houses (14 no. twobedroom houses, 87 no. three-bedroom houses and 39 no. four-bedroom houses) and 8 no. apartments blocks (A1 - five storeys, A2 - five storeys, A3 - four-storeys, A4 - threestoreys and G (4 no.) - three-storeys) comprising 106 no. apartments (68 no. onebedroom apartments and 38 no. two-bedroom apartments); (ii) construction of a new vehicular access road off Rathmullan Road, with associated junction works, and associated internal access road network with pedestrian and cyclist infrastructure; (iii) provision of a creche facility (509sq.m) with external play area (200sq.m) within the ground floor level of apartment block A3 and provision of a commercial unit (301sq.m) and community meeting rooms (205sq.m) within the ground floor level of apartment block A4; and, (iii) all ancillary site and infrastructural works, inclusive of landscaped public open space area to the north of the site to be ceded to Meath County Council, general landscaping and public open space provision, boundary treatments, foul/surface water drainage, attenuation areas, pumping station, removal of existing vehicular entrances and provision of visitor car parking bay (4 no. spaces) necessary to facilitate the proposed development. Each house will be served by vehicular parking to the front and private amenity space in the form of a rear garden. Each apartment block will have shared access to adjoining bin stores, car parking bays and bicycle parking bays and each apartment will be provided with private amenity space in the form of a balcony.'



Figure 14.0 Site layout plan submitted at pre-planning stage under Reg. Ref. LRD0022.

As per the above development description, the development proposed under Reg. Ref. 305552 comprised of:

68 no. one-bedroom apartments
38 no. two-bedroom apartments
14 no. two-bedroom houses
87 no. three-bedroom houses
39 no. four-bedroom houses
246 no. total residential units

The extent of residential development proposed would be served by 455 no. parking spaces at surface level, a creche facility, a retail facility, community meeting rooms and 3.3 hectares of public open space provided primarily in one large linear park and several smaller pocket park areas. The scheme would be served by new vehicular access points to Rathmullan Road along with all associated infrastructural improvements.

Following the submission of the pre-planning request, a Section 247 Pre-planning Consultation was held on 9<sup>th</sup> October 2023 wherein the proposal was discussed between the project design team and Meath County Council. The layout and design of the LRD proposal was the key discussion point from the consultation meeting with the Planning Authority guiding that the proposal needed revision to ensure that the residential scheme would provide a sense of place with individual character areas and focal points.

In February 2024, a revised layout was issued to Meath County Council ahead of a formal Stage 2 preplanning submission. Whilst this layout was received favourably in the context of achieving the placemaking objectives of the Planning Authority, further revisions were required owing to the publication of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, in January 2024.

### 3.5 Summary of Site History

It is clear and evident, given the long-standing residential zoning designation of the subject lands and the number and scale of the historic planning applications pertaining to the subject lands, that significant human effort has been expended on multiple proposals for the development of the subject lands to unlock them for their zoned purpose.

In this regard, we note that a wealth of information is available in the context of multiple design elements necessary to guide the development of the site including:

- Architectural Design & Layout
- Engineering Design & Layout
- Landscaping Design & Layout
- Lighting Design & Layout
- Tree & Hedgerow Maintenance & Planting
- Ecological Assessment
- Archaeological Assessment
- Flooding Assessment
- Planning Justification & Rationale

It is considered that the extent of information which has been gathered in respect of the subject lands leaves them in a unique position as very robustly assessed lands for the purpose of residential development, which remain yet undeveloped.

Moreover, it is considered that the extent of information which has been gathered in respect of the subject lands to date leaves them in a unique position as the lands upon which a new development proposal could be progressed and submitted for assessment within themost efficient timeframe

# 4.0 Pre-Planning Consultation

## 4.1 Section 247 Pre-Planning Consultation

The subject proposal, as currently presented, has been purposefully revised to address the feedback provided by Meath County Council at the initial Section 247 Consultation held on 6<sup>th</sup> November 2024. The proposal as presented at that stage provided for a total of 243 no. residential units alongside a creche facility. We note the attendees of this meeting as follows:

## Meath County Council

Deidre Fallon Teresa O'Reilly Joe McGarvey Alan Wall Triona Keating Alison Condra Senior Executive Planner Executive Planner Senior Executive Engineer Assistant Engineer Senior Staff Officer Administrative Officer

# Project Design Team

Kevin Hughes & Gerard Harris Jude O'Loughlin & Bartek Wytwskovski Joe Gibbons Lucy Carey & Chiarra Ferrari Hughes Planning & Development Consultants NDBA Architects Waterman Moylan Consulting Engineers CSRL Landscaping and Design

A full copy of the subject consultation meeting minutes prepared by Meath County Council is included in Appendix A of this report.



Figure 15.0 Site layout plan presented at initial Section 247 Consultation.

The key discussion points that arose during the Section 247 Pre-Planning Consultation are summarised below. <u>Each point is addressed to by reference to the information that was provided in advance of the LRD meeting request.</u>

#### Density

The initial proposal provided for a total of 243 no. residential units. The resulting density of 35.1 units per hectare was acknowledged by Meath County Council to be the lowest compliant density given Drogheda's status as a Regional Growth Centre with the Compact Settlement Guidelines Section 3.3.2 'Regional Growth Centres' identifying a density range between 35 and 50 units per ha in areas representative of Suburban/ Urban Extension locations

In response, it was noted that the figures for the total number of units and density had been increased to 244 no. and 35.25 per hectare respectively. The proposed density is thus compliant with the requirements of the Compact Settlement Guidelines. The site has been purposefully laid out to represent an appropriate balance between the need to ensure the efficient use of the subject site whilst preventing a scale of development which could appear overbearing relative to the comparatively lower density of development within the immediately adjacent area.

## Design, Unit Mix, Residential Amenity, Compliance with Standards, Childcare, etc.

We note the various comments made in respect of the subject elements detailed below. For ease of reference, our responses relating to similar design elements have been grouped together.

 With reference to the Compact Settlement Guidelines and the Variation No. 3 of the Meath CDP, which is currently on display, the onus is on the applicant to demonstrate the quality of the scheme and the residential standards. A full Housing Quality Assessment for all units within the scheme will need to be provided for the LRD Meeting/ Application with a full breakdown of all details for each unit, private open space, storage, room sizes, etc.

In response to the above, a Housing Quality Assessment has been prepared by NDBA Architects, which provides the requested details for each unit within the scheme, for review ahead of the subsequent LRD meeting.

 A detailed Design Statement is required – please see S.247 Meeting comments and requirements of the Meath CDP Chapter 11 - DM OBJ 13, Section 11.5.17 'Apartments', etc. The Design Statement required at DM OBJ 13 shall set out how the proposed scheme is compliant with same. The visual impacts of the development must be considered with CGIs and contiguous elevations to be provided.

In response to the above, an Architectural Design Statement prepared by NDBA Architects was submitted for review ahead of the subsequent LRD meeting. The statement provided commentary in relation to the scheme in compliance with DM OBJ 13 and Section 11.5.17 of the Meath County Development Plan and made reference to CGIs and contiguous elevations as relevant.

 A mix of building heights are required and SPPRs in the Building Height Guidelines are to be addressed. Note that Drogheda Environs identified under SPPR1 in the MCDP.

It was confirmed that the scheme provided development at two-three storey height. It was acknowledged that whilst there was scope to increase building heights, it was considered that the intended heights are appropriate relative to the site's suburban location on the edge of the Regional Growth Centre at Drogheda. A full response to the SPPRs of the Building Heights Guidelines would be provided at formal application stage.

• The internal design of dwellings must be carefully considered to avoid overlooking of adjoining private gardens (e.g. placing W.C. at FFL to the rear).

It was confirmed that all residential dwellings had been purposefully designed to provide a high standard of residential amenity for both intended residents and neighbouring dwellings with no extent of overlooking greater than that which can be expected in a typical residential scheme arising.

 Regarding the apartment blocks, there needs to be a differentiation between private, communal and public spaces.

It was confirmed that the apartment units provided on site each benefited from private amenity space in the form of a terrace/balcony with communal amenity space provided to the rear of each respective block for sole access by residents of that block and with each apartment block having access to the larger areas of public open space provided across the development.

There is a narrow lane between units 16 and 50/51 and consideration should be given to either
omitting it or widening it to provide greater security. Passive surveillance is particularly important
and needs to be provided here.

The subject lane was considered important from a permeability perspective and was retained with additional landscaping provided. It was confirmed that there was scope to provide dual aspect houses fronting this laneway if considered necessary by the Planning Authority.

 An inward noise assessment is required and noise mitigation measures should be included within the scheme given its proximity to the M1.

It was confirmed that the subject assessment would be carried out in advance of the lodgement of a formal application and mitigation measures would be included if required upon review of results.

 There is an opportunity to provide greater architecture interest/ focal point at the entrance to the site. Currently the entrance area/ entrance to the site is overly suburban and requires a stronger architectural presence.

It was noted that the levels at the site entrance were not conducive to providing additional built form and could present an overbearing impact on the adjoining public realm. Accordingly, the intended design of the site entrance was based upon utilising the significant level change to provide a high-quality visual aesthetic for the site entrance based on use of retaining walls to present a stepped area of landscaping.

It was noted that a request for feedback on this design of the entrance to the scheme was issued to Meath County Council on 9<sup>th</sup> December 2024 with a subsequent request made on 9<sup>th</sup> January 2025. No feedback was received prior to the formal request for the LRD Meeting. Thereafter, the following computer-generated imagery of the site entrance was provided for consideration by the Planning Authority.



Figure 16.0 Extract from the Landscape Masterplan submitted as part of the request for a Section 32 LRD Consultation Meeting. The area of blue fill identifies the area presented in the computer-generated images included in Figure 17.0 overleaf.





Figure 17.0 Ground-level views of the site entrance looking westwards from Rathmullan Road, these views cumulatively illustrate the dramatic change in levels relative to the existing roadway.



Figure 18.0 Aerial view of the site entrance as it connects to Rathmullan Road along the eastern site boundary.





Figure 19.0 Additional images providing context with regards to altering levels at site entrance.

It was considered that the computer-generated imagery of the site entrance clearly illustrated the level differences at this location thus supporting the rationale for the non-provision of additional built form within this area in order to further increase density. The images also presented the high quality and site-specific aesthetic which has been achieved for the site entrance and is considered to present an attractive vista to Rathmullan Road.

• The applicant is requested to review the interface with the adjoining White Lands (WL) to the south. The current layout shown of walls flanking the boundary is not considered acceptable. The applicant should demonstrate how the development would incorporate with other lands if they were to be developed and demonstrate inter-connectivity. Illustrate very broadly (high level block plan) how the remainder of the lands could be developed.

A revised proposed site layout plan showing a significant reduction in the extent of screen walls flanking the boundary with the White Lands was submitted for review ahead of the subsequent LRD meeting. The walls were minimised while still providing the necessary enclosure for the formation of character areas as required for a successful development. This was achieved while also accommodating adequate variety of interfaces with the adjoining white lands to facilitate future connectivity; by way of through road; road frontage, gable wall and rear wall interfaces allowing further integrated development to the south and west of the currently zoned lands.

Clear focal points are needed within the scheme. Structures should encapsulate a high-quality
design and distinct character areas should be created. There appears to be limited differentiation.
A mix of heights should impress the status and use of different components of the scheme. This
needs to be considered in further design iterations as density is addressed. Units to the southwest require a focal point with filtered permeability to the location.

A combination of strategies was used to achieve focal points and differentiation including both the natural contouring of the site and the introduction of a mix of heights as suggested. As illustrated below the corner forming three storey apartment buildings are located at critical focal points, in this case as the focus of the entrance road and addressing the central open space area as can be seen below.



Figure 20.0 Computer generated image of the scheme as currently presented.

• Public open space should offer greater residential amenity. Much of the public open space shown is very linear with large SuDS features. There isn't a clear street hierarchy within the scheme. The applicant is requested to provide a map outlining the FI open space and what area is to be used for SUDS. Private and public open spaces should be usable and functional. Public open space (P.O.S.) of 10.2% is above the minimum in the Compact Settlement Guidelines, however this has now been integrated into the MCDP Variation no. 3 and 15% is the minimum. F1 lands must not be included in the POS calculation. Private open space (minimum) requirements are set out at 5.3.2 in the Guidelines.

It was noted that the layout of the scheme had been revised with the central area of public open space reduced slightly and two new areas of public open space inserted into the north and south-western corners of the site, to reduce distances from residential units to areas of public open space. Whilst the provision of a number of linear public open spaces was acknowledged, it was considered that all spaces within the scheme are useable with the various spaces accommodating different purposes i.e. walking, sitting, general recreation, play and visual amenity. All private open spaces were designed in accordance with the provisions of the Compact Settlement Guidelines.

With regards to the quantum of public open space provided, the final scheme provides an increased provision of 16.9% public open space upon the residentially zoned area of land. Furthermore, the scheme provides an additional 1.68 hectares of public open space, not included in the figure used to calculate public open space, in the form of a new parkland, intended to be named the Boyne Valley Park, with this installation considered to represent a significant planning gain for the local area.

• Bin/ bike structures to be included in the design. Full landscaping and boundary treatment details are required.

It was noted that purpose-built bin and bike structures would be provided for each apartment block within the scheme. All individual houses and ground-level duplex units would accommodate bin and bicycle storage within their rear gardens whilst first floor level duplex units would be provided with bin and bicycle storage to the front of their buildings.

With regards to landscaping and boundary treatment details, documentation was prepared by CSR Landscaping and Design for review ahead of the subsequent LRD meeting.

• Blank walls along the main route within the scheme and open space (0.49ha) should be avoided with active frontage provided which is particularly important for passive supervision as well as visual aesthetic.

It was noted that the main route within the scheme had been amended to provide enhanced landscaping with a number of units amended to provided dual frontages thus addressing the route and improving the sense of passive surveillance.

• The proposed/revised location for apartments along road should create a more formal entrance to the scheme, which is welcomed, however consideration must be given to the on-site levels.

The above comment was not clearly understood as the apartment blocks were separated across the scheme and not along a single road. It was confirmed that the proposal had due regard for site levels with these levels incorporated into the design of the scheme.

• A Crèche should have sufficient outdoor play space. This is currently along the rear gardens of adjoining terraced houses. Consider the privacy of the children's play area and residences. It may be better to separate out the crèche into an area on its own, typically close to Public Open Space. Note that F1 zoning allows for a creche, provided no flood risk issues, etc. A reworking of this cell with houses, créche and shop is advised. The applicant should ensure there is a childcare provider on board to advise of their needs, ensure the design is suitable to have it operational quickly.

It was confirmed that the crèche facility would be retained in the north-eastern section of the site with a new public open space provided along its western boundary to ensure adequate separation from neighbouring dwellings. Additional screen planting could be provided with the external play area to the rear of the creche if considered necessary by the Planning Authority in respect of residential amenity to the immediate north of the creche.

• No community facilities are being provided in this iteration. Consider what could be provided alongside the creche e.g. retail. A Social Infrastructure Assessment must be submitted with any future planning application. Consider putting apartments over a shop.

It was acknowledged that no community facilities were being provided under the current application and that a Social Infrastructure Assessment would be provided at formal application stage to identify schools, childcare, retail offerings and provision of other services in the area

 No duplexes proposed –a mix of unit types and tenures to meet the needs of the area must be demonstrated and there must be clear justification for the proposal (as per the Meath CDP).
 Policy DM POL 6 refers: To require that the unit typologies proposed provide a sufficient unit mix which addresses wider demographic and household formation trends.

The unit mix was provided for review ahead of the subsequent LRD meeting.

• First block to houses the north-east of the apartments should front onto the road/ main route through the estate and around the open space (0.49 ha).

It was not clearly understood as to which section of the scheme the above comment related given the provision of 11 no. separate apartment blocks at S.247 stage.

 Proposal should include buildings with a raised height (e.g. 3/4 storey or a mix with higher bookends, etc.).

It was confirmed that the scheme would provide two-storey housing units and three-storey duplex buildings and apartment blocks with the intended building heights considered appropriate given the location of the subject site relative to the centre of Drogheda

• Corner units within each cell must have dual facades/ frontage.

It was noted that an increased quantum of dual frontage houses was incorporated into the scheme.

# Traffic and Transport, DMURS, Public Lighting, etc.

 A full Traffic & Transport Assessment is required, and the application needs to consider how the various junctions are impacted. It must validate that they have capacity including that of Marley's Lane in Co. Louth.

A preliminary TTA based on traffic counts from 2022 was prepared for review ahead of the subsequent LRD meeting. The TTA would be later updated to reflect the recently completed traffic counts and the updated/final TTA, as prepared by Waterman Moylan Consulting Engineers, has been submitted as part of the formal application.

The internal road networks should be DMURS compliant, show the key linkages and make
provision for any future bus/ transport routes should any further lands be rezoned. Cycle paths
should follow desire lines and link to schools and town centre. The housing units to the SW have
no linkages and a DUMRS quality audit should be completed.

It was noted that a DMURS Quality Audit was to be prepared in due course, as is included as part of the formal application, as prepared by Waterman Moylan Consulting Engineers.

 Regarding the proposed upgrade to the Oldbridge Road, due to width restrictions a setback will be required for the development to allow road widening, and any plans need to cater for a junction to the Greenway. The road width should be 5 meters wide plus a shared surface for pedestrians & cyclists. Provision should be made for a link between the site to the greenway. The Planning Authority would like to see more permeability between the site and the Oldbridge Road.

It was noted that the subject greenway was currently under construction and would be completed in the next six months. The presence of an original stone wall and existing trees along the eastern site boundary means it was not possible to facilitate a set back from the existing road into the site. In support of the retention of this original stone wall, the Planning Authority was asked to have regard for a letter prepared by Archaeology & Heritage Consultancy Limited.

 Works to determine the existing road width are underway with the scraping away of vegetation but there is reduced scope on the eastern side of the road. No details design has been carried out yet, a topographical survey is underway, and the final design will be shared with the applicant once completed.

It is noted that the subject greenway was, in fact, already under construction as per the below photograph. The design team had not been furnished with design drawings of this infrastructure.



Figure 21.0 Image taken along the northern site boundary in late January 2025 illustrating the subject greenway under construction.

Existing access points to the Oldbridge Roads should be used at locations of existing access.

It was confirmed that existing access points to the Oldridge Road would be utilised.

Car & cycle parking should be provided in line with the MCDP. Attention was drawn to Variation
3 to the Meath County Development Plan in this regard. To encourage modal shift from cars,
cycling storage should be provided. EV charging is also required and it is important to consult
with ESB early in the design of a network for the housing estate.

Vehicular parking provision was provided in full accordance with the provisions of the Meath County Development Plan. In accordance with SPPR 4 'Cycle Parking and Storage' of the Compact Settlement Guidelines, bicycle parking would be accommodated within the rear garden of all residential units which have ground level open space.

Each apartment block would be provided with dedicated bicycle parking structures whilst each upper level duplex unit would be served by a bicycle parking structure to the front.

Parking provisions for the shop and crèche to be considered

It was confirmed that no shop facility was proposed for the subject scheme and that the crèche would be served by vehicular parking spaces in the adjoining parking bay to the immediate south.

 Public lighting was not designed and shall be provided to all public spaces within the confines of the development (including road frontage). The public lighting shall be designed and installed as per "Meath County Councils; Public Lighting Technical Specification & Requirements" document. The applicant is requested to submit a public lighting design in accordance with above specification.

It was confirmed that documentation relating to public lighting would be provided at application stage.

#### Flood Risk Assessment & Management & Surface Water Drainage

 Proposed discharge is to an existing 1200mm culvert, a survey of this infrastructure is to be conducted. All detention basins are to be positively drained and should not affect the open space. Details section of the pond is to be provided and a detailed topographical survey of the site is required.

It was noted that the culvert survey will be carried out for inclusion in the planning application. Detention basin details and associated survey were provided for review ahead of the subsequent LRD meeting.

• The CFRAM map is currently being updated and the site is currently located in Flood Zone C. A commensuration flood risk is to be submitted. A detailed survey is to be included and include overland conveyance routes from the site. A Masterplan of the entire site is requested with a high-level detail of the other zonings to be included. A map should include the zoned green spaces and should ensure that they can be used for nature-based solutions.

A Flood Risk Assessment prepared by JBA Consulting was prepared for review ahead of the subsequent LRD meeting.

• Clarification is required on the location of the pumping station and the separation distances to the houses, and it was recommended a Noise and Odour Assessment be carried out.

The location of the pumping station and the separation distances to the house were clearly identified for review ahead of the subsequent LRD meeting. It is not considered necessary to include an odour assessment given the achieved separation distances, whilst it was confirmed that noise would be addressed within the EIAR submitted at formal planning application stage.

• Details requested on the land take required for the pumping station, a visual of what it would look like over and underground.

Details regarding the land take required for the pumping station and associated visuals were provided for review ahead of the subsequent LRD meeting.

Surface water outfall cross sections are to be provided, details of the cross fall and the slope of
embankments are required for maintenance purposes and should demonstrate where access
can be provided for the tanker. Detail is required on the above ground infrastructure to assess
its suitability.

The above comment was not clearly understood as it appeared to refer to surface water but then referenced a tanker. It was noted that relevant cross sections were included for review ahead of the subsequent LRD meeting

## Water Supply and Wastewater Treatment

 Upgrades work include increases to the capacity of the existing UÉ watermain network, extensions to the existing watermain network and the provision of a Flow Control Valve to be laid as part of the network extensions. These works are not currently on the UÉ investment plan therefore, the applicant will be required to fund these local network upgrades. The fee will be calculated at connection application stage.

It was noted that the flow control valve being referenced in the above comment would be installed by developers who are active on the on the north side of Drogheda.

• In terms of the Wastewater Connections, connections are feasible subject to upgrades. The applicant is to provide for additional upsizing and storage at proposed Pumping Station (PS) to accommodate diversion of flows from Riverbank / Dale PS and Old Bridge Manor PS. These works are not currently on the UÉ investment plan therefore, the applicant will be required to fund these local network upgrades and the decommissioning of the Dale/Riverbank PS. The applicant could utilize the existing rising main from the Dale / Riverbank PS for approximately 300 no. units from the proposed site after which the rising main will need to be upgraded. The number of units will be again assessed at connection application stage.

It was confirmed that the proposed pumping station will be appropriately sized for the existing nearby developments as required by UE

Given the current proposal has increased the number of proposed residential units to 240. no.
residential units, a new Pre – Connection Enquiry will have to be submitted to UÉ for an updated
assessment. There is an average period of about 16 no. weeks to assess any given PreConnection Enquiry application. It is important that the outcomes of the Pre-Connection Enquiry
application (i.e. Confirmation of Feasibility letter) has been obtained by the applicant prior to the
lodgement of the formal planning application.

It was confirmed that a Confirmation of Feasibility had been requested from Uisce Éireann but was yet to be received. The COF was subsequently received on 1st April 2025 and is included as an appendix to the enclosed Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers.

It is recommended that a SODA be in place and submitted at full planning application stage.

The above comment was acknowledged and it was confirmed that the relevant documentation would be provided at formal planning application stage.

## EIA, AA & other Environmental Assessments

• EIAR-If the proposed development is required to submit an Environmental Impact Assessment Report, then the applicant is required to submit an EIAR Scoping document to UÉ in order for us to have an opportunity to provide our feedback on areas pertaining to UÉ infrastructure etc.

It was confirmed that an Environmental Impact Assessment Report would be prepared for the subject application and a scoping document would be issued to Uisce Éireann in advance of the formal application being lodged.

 EcIA or EIAR & AA Screening and NIS (River Boyne SAC and SPA) to be submitted and all relevant survey to be carried out at the appropriate time by personnel with requisite qualifications. It was confirmed that a full suite of relevant EIA, AA and other environmental assessments will be provided at formal application stage.

## Landscape Strategy & Management, Amenity Space, etc.

 Landscape statement to demonstrate the required open space and the delivery and functionality/ amenity value for the span of age groups.

In response to the above item, a suite of documentation provided by CSR Landscaping & Design for review ahead of the subsequent LRD meeting.

• A full arboricultural assessment, boundary treatment details. Mapping to identify street planting and the location of services throughout the scheme.

It was confirmed that a full arboricultural assessment would be provided at formal application stage. Documentation relating to boundary treatment, street planting and the location of services was submitted for review ahead of the subsequent LRD meeting.

#### Cultural Heritage - Archaeology

- Cultural Heritage to be addressed in the application indicating the close proximity to Brú na Bóinne. MCC's Archaeologist has advised that
- The referenced Archaeology and Built Heritage report should be included in the Planning documents. This report should contain a plan and detailed results of the 07R0190 and follow-up testing 08E0506 report, which should now be available from archaeology.ie Reports portal.
- The Archaeology and Built Heritage should include proposed mitigations that may comprise:
  - Metal detection survey of ploughed topsoil in regular transects to determine if there are any artefacts from the Battle of the Boyne 1690.
  - Increase the area of trial trench testing across the site to a level of 12%, present the results and propose mitigation in the form of an Archaeological Impact Assessment, copied to the Local Authority. This mitigation (typically preservation in situ or rescue excavations) should then be completed before construction starts. With this approach, those areas without archaeological remains can usually be left for construction without monitoring, with the agreement of the National Monuments Service.
  - Clarify the location, date nature and extent of SMR Enclosure ME020-072. This seems to have been partly tested in 08E0506 and additional testing is required for further information to determine the mitigation.
  - The area of Enclosure ME020-088 and its Notification Zone adjacent to the development is a vulnerable monument located under 0.30m topsoil. How is this due to be preserved during construction of the present proposed scheme and potentially into the future?
  - A build heritage survey of the derelict farm buildings and Rathmullan Road roadside boundary wall is required to determine if any further mitigation is required.
  - The location and extent of the heritage 'demesne landscape' woodland on the site should be preserved where feasible.
- This large-scale residential development is on a site that contains and is adjacent to known archaeological remains. Therefore, a comprehensive mitigation strategy – suitable staged as appropriate – is required to be presented by the developer to ensure the preservation in situ or by record of archaeological, architectural and cultural heritage remains.

In response to the above comment, and for review ahead of the subsequent LRD meeting, an Archaeological Impact Assessment & Method Statement was prepared by Archaeology & Heritage Consultancy Limited.

## Housing Part V/ LDA (Part 9), Universal Design

The applicant stated that a full proposal will be provided with Stage 2 consultation. The
percentage provision is to be calculated once the supporting information is provided to the
Housing Dept. The applicant was advised to contact Mr. Gerard Soady in relation to confirming
what MCC's demand is and what the most suitable type of units were required.

- The Part V obligation of 10% or 20% must first be established.
- Part of the evaluation process will include the Part V property type and location within the development, which compliments the housing needs of Meath County Council. No proposal has been submitted so cannot comment on same. If a 20% obligation is determined, a minimum of 10% is required to be made available for social housing and the remainder will be made available as affordable units to be purchased by persons nominated by Meath County Council directly from the developer. Further information will issue once the Part V obligation is clarified. The Applicant will be required to submit a complete Part V proposal prior to commencement (if planning permission is granted) to be considered by Meath County Council. A minimum of 5% universal design units are to be supplied in the development. The applicant is referred to Secure by Design Guidance in the design and layout of the scheme.

In response to the above comment, Hughes Planning & Development Consultants contacted Mr. Gerard Soady of Meath County Council who provided the following commentary with regards to Meath County Council's demand:

'Most of our demand is 1 & 2 bedroom with a requirement of some 3 bed. Our preference is for non-duplex properties, 2 beds properties to be houses and to be located throughout the development. For a rough guide without exact calculations if you could indicate 24 properties, with 10 1 bed, 10 2 bed & 4 3 bed as a starting point.'

The above unit mix suggested by Meath County Council was applied as illustrated on the Part V Site Layout plan which was submitted for review ahead of the subsequent LRD meeting.



Figure 22.0 Extract of Proposed Site Plan - Part V illustrating compliance with the request communicated by Mr. Soady on behalf of MCC.

## Any Other Issues

The Broadband Officer has noted that no Broadband Plans were supplied with this application.
 These will need to be provided, and new regulations require plans for in-building telecommunications networks to be designed and submitted prior to construction.

It was confirmed that documentation relating to broadband would be provided at formal application stage with the enclosed Energy, Utilities and Telecommunications Statement, as prepared by McElligott Consulting Engineers, providing this information.

 A Social Infrastructure Assessment is required as part of the application, outlining the schools, childcare, retailing offering and provision of other services in the area.

It was confirmed that a Social Infrastructure Assessment would be provided at formal application stage. This assessment was subsequently prepared by Hughes Planning & Development Consultants, as enclosed with this application.

# 4.2 Section 32 LRD Consultation Meeting

The subject proposal, as currently presented, has also been purposefully revised to address the feedback provided by Meath County Council at the LRD Consultation held on 5<sup>th</sup> March 2025. The proposal as presented at that stage provided for a total of 244 no. residential units alongside a creche facility. The attendees at this meeting were as follows:

#### Meath County Council

Teresa O'Reilly Executive Planner
Alan Russell Senior Planner
David Keyes Senior Engineer
Adrian Santry Executive Engineer
Joe McGearty Staff Officer

#### Project Design Team

Gerard Harris
Jude O'Loughlin & Bartek Wytwskovski
Joe Gibbons
Lucy Carey & Chiarra Ferrari
Kevin Cleary
David Casey
Catherine Keogan & Michelle Gaffney

Hughes Planning & Development Consultants
NDBA Architects
Waterman Moylan Consulting Engineers
CSRL Landscaping and Design
Verde Environmental
JBA Consulting
DNV

A full copy of the subject consultation meeting minutes prepared by Meath County Council is included in Appendix B of this report. It is considered prudent to clarify that the extent of development stated in Section 1.0 and presented in Section 5.0 of this report is based upon the feedback received from the Council at both stages of consultation with the Planning Authority. The below extract of the site layout plan was presented at the Section 32 LRD Consultation to illustrate the revised design.



Figure 23.0 Site layout plan presented at Section 32 LRD Consultation.

We have noted and responded to the key discussion points arising from the Section 32 Consultation below:

## Site Zoning, Phasing, Core Strategy & Density provisions of the MCDP

- TOR advised the applicant to ensure there was no encroachment on WLs; and F1 zoning cannot be used for P.O.S. calculation. The 15% requirement must be provided separately.
- The applicant's Statement of Consistency must address the capacity within the existing Core Strategy for the Southern Environs of Drogheda, noting that Variation no. 3 to the MCDP included text to address the role of Settlements.
- The applicant is advised to consider and provide details on any recent planning applications in the area. All Section 28 Guidelines to be considered including 2024 Compact Settlement, Apartment Guidelines, Building Height Guidelines, etc.
- Phasing of Development TOR stated that phasing proposals should be submitted with any
  application as no details were provided for the LRD Meeting. This should include the delivery of
  a mix of units, new road infrastructure, open space and creche in the first phase of development
  with key infrastructure provided prior to the occupation of development.

In response to the above comments, we confirm that the subject proposaldoes not encroach on White Lands and does not rely on F1 zoned lands for the calculation of public open space requirements. Moreover, it is confirmed that the subject development includes 16.9% of the residential (A2) zoned lands as public open space in addition to providing for the delivery of a 1.68 hectare landscaped public park which is to be transferred to Meath County Council. With regards to addressing the capacity of Drogheda in relation to the core strategy, this is discussed in Section 6.10.2 of this report. Furthermore, all relevant guidelines are addressed in Section 5 of this report. It is noted that a phasing plan is included with this application as prepared by NDBA Architects.

As an aside, it is noted that both the Joint Drogheda Local Area Plan and Variation No. 4 of the Meath County Development Plan were discussed at the Section 32 Consultation. It is noted that there has been no further update with regards to the Joint Drogheda Local Area Plan and that Variation No. 4 of the Meath County Development Plan relates solely to the Maynooth and Environs Joint Local Area Plan (LAP). Accordingly, there is no commentary provided on these documents in this report.

## Design, Unit Mix, Residential Amenity, Compliance with standards, Childcare, etc.

- Connectivity to the Surrounding Area TOR discussed the importance of the proposal being well
  connected to the surrounding area. Access to the greenway should be clearly provided as well
  as connections to the remainder of the landholding and externally to the surrounding area.
- Architectural Design Statement A Design Statement should be submitted and address the Urban Design Manual. Units must feature a high-quality design. The applicant was requested to provide CGIs and Contiguous Elevations within the application.
- Layout TOR referred to the visuals provided and the proposed viewpoints which are useful, though only provided from the entrance thus far. It is recommended that views are provided from the NE/SE & SW of the site, from within the Boulevard and Central P.O.S. and the same locations (as per photos) identified with the Planning Report lodged for the LRD Meeting.

In response to the above points, we would note that connections between the subject site and both the greenway and surrounding area are clearly illustrated within the wider application pack whilst the possibility of providing connections to the wider landholding is also demonstrated. It is noted that the application includes an Architectural Design Statement along with the requested computer-generated imagery and contiguous elevations. The montage imagery provided to guide the Visual Impact Assessment prepared by Cunnane Stratton Reynolds is based on the above-recommended viewpoints.

• Enhancements to the entrance are required, with House Types 3.1 and 4.1 and there should not be any blank walls at this location. The finish to the house types at the entrance to the site are the only red brick within the development, and the applicant was urged to provide more variety in appearance throughout the development, with some of the dwellings being replaced by apartments. A modified apartment could replace unit 3.1 (RHS) and more animation/ activation is required at 4.1 (LHS). The entrance to the housing estate should be given greater emphasis.

- The length of the units alongside the Boulevard is excessive and smaller cells need to be introduced. There are limited changes between unit types 3.7 and 3.8. The alley way proposal should be omitted from the final design.
- Focal points Apartments are used as focal points and can be further used in the development. The design of the apartments is acceptable; however, the privacy of balconies must be enhanced with activated corners.
- The prominence of the Pumping Station is a concern, in terms of its size and suitable screening, as well as separation distance to dwellings. The usability of Public Open Space must be clearly demonstrated as part of any future planning application. The crèche is also a focal point and it must have nearby access to open space.

In response to the above comments, we first note that the referenced pair of house units adjoining the main entrance has been replaced with an apartment block with enhanced external landscaping thus ensuring that there are no blank elevations to the main access road and further improving on the attractive and site-specific landscaping which adjoins the access road.

Whilst referenced as an alleyway, in fact the pedestrian route provided at stage 2 between the central area and eastern areas of public open space is comprised of a footpath flanked by landscaping on either side and would be considered representative of an attractive throughway between the areas of public open space. With regards to the 'boulevard', an additional pedestrian throughway has been incorporated to provide a visual connection between the central area of public open space and the landscaped park to the north whilst also creating an additional residential cell as requested. The previously provided throughway has been relocated southwards and extended with both throughways providing a generously proportioned means of traversing the site whilst also achieving an appropriate break-up of the main row of houses on site and being suitably overlooked by adjoining houses.

With regards to apartment blocks, the final proposal provides for a total of 11 no. blocks, relative to the 8 no. proposed at stage 2, with three of the blocks being of four storey height with the balance extending to three storey height. It is considered that the apartment blocks are suitably positioned to act as a focal point and are appropriately separated across the site to ensure a strong sense of community between the residents of the various typologies on site. The privacy of the balconies is suitably demonstrated on the enclosed architectural drawings.

It is noted that the pumping station has been relocated slightly whilst enhanced landscaping has been detailed to ensure that the station is suitably screened from view. The usability of the variety of public open space areas is suitably detailed in the enclosed landscaping documentation whilst the creche facility is provided with a dedicated external play area and is situated within easy walking distance of both the central area of public open space and the landscaped park to the north.

- Character Areas this has not been stated and there is a clear need for distinctiveness within
  the development. The applicant is requested to provide for a sense of place and variety within
  the development, a description of the character areas must be provided and the applicant needs
  to show greater changes throughout the development, e.g. there are only red brick units at the
  entrance.
- Statement of Residential Amenity This should demonstrate how the proposal meets the
  requirements of the 2024 Compact Settlement Guidelines and Apartment Guidelines 2023.
  Overlooking to be considered in any re-design. Separation distances between the units should
  be re-examined in the context of the 2024 Compact Settlement requirements. Some are at 8m,
  with a minimum of 16m required. Bedroom windows (first floor, rear elevation) which overlook
  rear gardens of other dwellings, could be replaced with bathrooms to increase privacy of
  adjoining properties.
- All housing/ apartment/ duplex unit drawings to show left and right entry structures. This must be submitted with the application.
- Bin/ cycle storage must feature robust finishes (i.e. brick surrounds), and this should be
  addressed in the Building Lifecycle Report which must be provided for the development. The
  applicant was urged to focus on robust materials in the main public facing areas of the
  development, focal points, etc. which require little maintenance.
- Passive supervision must be achieved throughout the development with greater activation of corners/ frontage.

With regards to character areas, we request the Planning Authority to have regard to the enclosed Architectural Design statement as prepared by NDBA Architects. With regards to the requested Statement of Residential Amenity, we note that the manner in which the subject proposal is compliant with the requirements of the 2024 Compact Settlement Guidelines and the newly published Apartment Guidelines 2025 is demonstrated in Sections 6.4 and 6.11 of this report.

In terms of separation distances between units, we note the following requirements from SPPR 1 of the Compact Settlement Guidelines:

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.'

As per the above commentary, the provided minimum separation distance of 16m, achieved by virtue of 8m distance from first floor rear elevation to rear boundary, is compliant with the provisions of the Guidelines. Further, we note that lower separation distances can be supported where overlooking has either been prevented or mitigated. It is considered that the separation distance achieved under the current application is sufficient to prevent undue overlooking impacts. It is noted that all residential units have left/right entry structures and all bin/bicycle structures are of robust materials. It is considered that passive supervision is clearly visible throughout the development with appropriate activation of corners/frontages to the public realm and shared spaces.

- Building Heights are to be varied with only two-three storey height currently proposed across the scheme. SPPR1 of the Building Height Guidelines (and MCDP) identifies Drogheda as a location suitable for increased height. This must be addressed by the applicant.
- Unit mix must be outlined in the LRD Application. Different types of units must be provided with the importance of variety of choice being delivered. The current proposal suggests a reasonable mix at 13% 1-bed, 27% 2-Bed, 50% 3-Bed and 10.2% 4-Bed, however, the MCDP requires any application to provide justification for the proposed unit mix. Please consider what is constructed in the area, demographics, etc.
- HQA any issues identified would be explored further in the LRD Opinion. TOR stressed the
  importance of ensuring structures are dual aspect, that the proposal includes for the provision of
  bulky storage, GFL Floor to Ceiling Heights of 3m should be considered as is currently at the
  minimum of 2.7 metres.
- P.O.S. requirement of 15% applies (as per MCDP varied to incorporate 2024 S. 28 Guidelines).
  The applicant indicates that this is 16.77%, however F1 cannot be included in this calculation
  and a Statement regarding the usability and functionality of each space for the occupants of the
  new development is required. This must include active and passive space.

With regards to building heights, it is noted that the final proposal has been amended to include 3 no. four-storey apartment blocks thus changing the range of heights across the scheme to two, three and four storey. The suitability of this height range, in the context of SPPR1 of the Building Height Guidelines, is discussed in Section 6.3.1 of this report. With regards to unit mix, we note that the proposed mix is clearly presented in Section 4.0 of this report with justification for the mix provided in Section 6.10.5 of this report.

The comments regarding dual aspect, bulky storage and floor to ceiling heights are made in reference to the apartment units. In this regard, we would note that the scheme is wholly compliant with the requirements of the 2025 Apartment Guidelines on these design elements. Whilst bulky storage areas have not been provided, it is noted that each apartment unit within the scheme exceeds the minimum floor area requirement by more than 10% and, accordingly, it is considered that the non-provision of this extra feature is justifiably mitigated.

With regards to public open space, it is noted that the requirements are achieved where the final percentage figure for this element of the scheme is 16.9%. This figure has been calculated solely in respect of the land within the red line boundary which is subject to the A2 zoning objective. The usability and functionality of each space is clearly presented in the enclosed Landscape Design Statement.

- Private Amenity This should be consistent with the requirements of the Compact Settlement Guidelines and Apartment Guidelines.
- Daylight and Sunlight Assessment is required, though it is noted that the applicant indicates that most units benefit from dual or triple aspects.
- Plot ratio/ site coverage details will need to be provided in accordance with the MCDP.
- Childcare Facility the applicant proposes a standalone unit in the north-east of the site adjoining some POS, stated as accommodating 50 no. children within 500sq.m. The applicant will need to demonstrate the minimum clear floorspace requirements and ensure that ancillary areas separate. Under provision will not be accepted. All requirements as per the 2001 Guidelines + 2016 Child Care Regulations are required. The applicant must consider the provision of outdoor space and the privacy of the outdoor space, and potential overlooking from apartments. In addition, the following must be addressed boundary treatment, robust material finishes, bicycle and car parking spaces and waste storage, etc.

In response to the above points, it is noted that all residential units within the scheme provide private amenity space in compliance with the requirements of the Compact Settlement Guidelines and Apartment Guidelines as applicable. The application is accompanied by a Daylight & Sunlight Assessment, as prepared by Chris Shackleton Consulting, and plot ratio/site coverage standards are in fully compliant with the required standards in the Meath County Development Plan. With regards to the crèche facility, we note that the creche is intended to provide care for the following age groups which, in turn, require the following clear floor space per child as per the Child Care Act 1991 (Early Years Services) Regulations 2016:

- 1-2 years 2.8sq.m per child
- 2-3 years 2.35sq.m per child
- 3-6 years 2.3sq.m per child

As per the enclosed floor plans for the crèche, the facility will accommodate 58 no. children based upon the following breakdown of the various spaces:

- 15 x 1-2 years minimum required floor area = 42sq.m provided floor area 43.2sq.m
- 19 x 2-3 years minimum required floor area = 44.65sq.m provided floor area 45.5sq.m
- 24 x 3-6 years minimum required floor area = 55.2sq.m provided floor area 58sq.m

As per the above, the crèche is compliant relative to the minimum clear floor space requirements. In addition, we note that the crèche provides an external play area extending to 143sq.m which is appropriately useable and is suitably separated from adjoining residential units to be private. Associated provisions including car parking, bicycle parking and bin storage are provided within the immediate vicinity of the creche.

## Traffic and Transport, Access, DMURS, Public Lighting, Car-parking, etc.

- AS stated that the gradient of the cycle way at the main access point to the North is not acceptable.
- There should be some access to the NE included in the design as the NW may not get the required sightlines and there is no access point to the Greenway at the NW.
- JG referred to a lot of embankments which would need to be removed to provide this. The existing hedge is tight to the road and there is no crossing point to the north-east.
- LC stated that barriers could be added to stop/ slow pedestrians at the crossing point, but the proposal could not work. She referred to the embankment, differences in levels and the need to retain the trees and limit the impact on these existing ecological features. The proposed pathway was to be 1:20, which can act as a cycleway as well. She referred to the desire lines within the F1 and POS area which are illustrated as shown, due to difference in levels.
- AS referred to the footpath on the north side of the entrance and noted that a 2-way cycleway is a requirement in the Cycle Design Manual. The applicant must demonstrate that a bus can access the link street and exit onto the Sheephouse Rd. (Masterplan to be shown). At the access junction, a width of 6 metre and a footpath on either side is required. There must be sufficient width to access further/ future development to the west. AS referred to the proposed alleyway which should be omitted, and the proposed retained wall. AS noted the corner radii and the requirements as per DMURS.

In response to the above points, we would first note that the cycle connection to the Rathmullan Road has been revised to provide a more gentle gradient with both of the connections to the roadway via the northern section of the site being amended to provide enhanced sightlines for those leaving the parkland area. With regards to demonstrating bus access, junction width and footpath provision, we request that the Planning Authority haregard to the enclosed Traffic and Transport Assessment, prepared by Waterman Moylan Consulting Engineers. As noted previously, the throughway which is referenced Ras an alleyway (in the above commentary) has been retained, relocated and widened further. With regards to demonstrating DMURS compliance, we refer the Planning Authority to the enclosed DMURS Statement, prepared by Waterman Moylan Consulting Engineers.

- The applicant must provide the required amount of EV Charging at the proposed Apartments.
- The cycle storage should be in accordance with the Design Standards for New Apartments (2023) located internally within the footprint of the apartment and comprise solid construction (brick and block). It must be able to accommodate cargo bikes and bikes with trailers.
- To the west of the site, the applicant must demonstrate there is sufficient car-parking spaces. A max of 6 no. car-parking spaces together is required as per DMURS. Footpaths shall be at least 1.8 metres in width and include an additional verge of at least 0.3 metres where there is adjacent perpendicular car parking to cater for vehicle overhang, provide accessible parking spaces (comply with Part M) and cycle-parking at the crèche must also be addressed with space included for cargo bikes.
- DMURS Statement Road hierarchy does not match drawings submitted. All documents should be mutually explanatory and revised as necessary. The shared surface areas must be of sufficient width. JG noted same and will contact the Transport Section before any proposal is submitted.

All vehicular parking spaces provided on site are capable of being connected to the necessary infrastructure for the purposes of EV Charging. With regards to bicycle storage, whilst provision of same within the footprint of an apartment building is stated within the 2025 Apartment Guidelines as the preferable approach, the guidelines state that such storage can be accommodated in a dedicated facility of permanent construction. In this regard we note that each apartment block and duplex building has the benefit of access to dedicated bicycle storage sheds proximate to their respective units.

As is detailed in Sections 6.3.1 and 6.10.12 of this report, sufficient vehicular parking is provided on site and it is noted that no individual parking bay exceeds 4 no. spaces across the site. With regards to demonstrating DMURS compliance, we would ask the Planning Authority to have due regard for the enclosed DMURS Statement, as prepared by Waterman Moylan Consulting Engineers.

#### Surface Water/ Flood Risk Water/ Wastewater

- TOR queried how would the pumping station be screened, noting concern with its prominence.
- DOB stated that the FRA and other reports all showed a different red line boundary and queried whether the red line boundary (RLB) would include the Rathmullen Road. Road upgrades were not included on the development description. He stated that the red line boundary must be consistent across the development application documents. Similarly, the description of the proposal must be clear and consistent. If the Rathmullen Rd. is included in the boundary, this must be subject to Flood Risk Assessment. A 2-metre-wide footpath has been constructed by MCC.
- JG confirmed that the Rathmullen Road was not inside the RLB, and showed the shared surface area constructed by MCC, currently a 2m wide footpath. The RLB can be amended if necessary. JG stated that this will be clarified for the application.
- DOB confirmed the SSFRA should include the updated RLB. A 1200mm culvert has already been built.
- JG confirmed the culvert was completed already and updated drawings will include same. JG stated that a headwall has already been constructed across the culvert and showed images of works completed recently on same.
- DOB stated that a detailed topographical survey should be submitted for the entire site.
- DK referred to the catchment in the area and capacity of same which should be assessed and results submitted as part of the assessment. The capacity in the 1200mm culvert to accommodate critical flows must be demonstrated.

• Flooding on part of the site must be considered. The Flood Zones extend into the RLB and if the road is flooded, this needs to be taken into assessed in the SSFRA. The applicant was requested to apply the Justification Test. It is particularly important that there is a Flood Management Plan, if flooding should occur, particularly if the Rathmullen Rd. is inside the RLB.

A detailed topographical survey is included within the suite of documentation prepared by NDBA Architects. With regards to the capacity and assessment of the 1200mm culvert, we request that the Planning Authority have regard to the enclosed Engineering Assessment Report as prepared by Waterman Moylan Consulting Engineers. With regards to Flood Risk Assessment and Management we request that the Planning Authority have regard to the enclosed Flood Risk Assessment as prepared by JBA Consulting.

- DOB requested that the applicant clarify the Soil Index Classification values for the site.
- The location of the attenuation system in the north catchment is to be reviewed. There are steep banks so the attenuation type may need to be changed to suit site conditions and maintenance requirements.
- There is a clash with the foul pumping station. This is not acceptable. Petrol interceptors must be placed upstream. The applicant must demonstrate the functionality of the Public Open Space and ensure that the proposals for SW won't affect this.
- Storage tanks should be avoided, and SUDS features are to be agreed with Environment Section, as there is potential for more NBs (i.e. nature-based solutions).
- JG stated that this will be addressed, noting that the attenuation to the north is challenging but they will come up with solutions.
- TOR stated that a representative from UÉ was not in attendance, but any comments provided would be included in the LRD Opinion.

It is noted that the Soil Index Classification value for the site is 0.37 as stated in the enclosed Engineering Assessment Report as prepared by Waterman Moylan Consulting Engineers. For full details with regards to the attenuation system, the foul pumping station and consideration of nature-based solutions, we would ask the planning Authority to have due regard for the enclosed Engineering Assessment Report as prepared by Waterman Moylan Consulting Engineers

# Environmental Impact Assessment (EIA), Appropriate Assessment (AA) & Environmental Assessments

- TOR stated that Environmental Assessments must inform the design/ location of the development. All reports shall clearly identify the author and their requisite qualifications and experience. All surveys should be carried out at the appropriate time of year.
- An EIAR and AA Screening and NIS will be submitted with the application. It is noted that the EIAR addresses a site area of 9.15ha site and the applicant has indicated that a Scoping is being prepared and will be issued to UÉ in advance of planning application.
- With regard to AA Screening and NIS these should inform the proposed development. The site is 40-50 metres from the southern bank of the River Boyne, with the site elevated c. 10 metres above the riverbank. The applicant must carefully consider and assess the full extent of the red line boundary within the AA documents, the ZOI associated with the proposed development, provide a Method Statement for any works in Watercourses, assess all surface water, flood risk issues, public lighting, landscaping and any likely significant effects on the River Boyne European Sites, or other relevant Sites.
- The applicant is urged to address the issues specifically raised in the J.R., namely silt and pollutants mobilised from the development site and significant impacts on avi-fauna QI in respect of ex-situ impacts on the Boyne Estuary SPA.

All environmental documentation enclosed with this application, including the EIAR, AA and NIS reports, clearly identifies authors and their qualifications/experience and is based upon the red line boundary and included method statements where relevant. All surveys have been undertaken at the appropriate time.

Details regarding silt and pollutants mobilised from the development site and significant impacts on avifauna QI, in respect of ex-situ impacts on the Boyne Estuary SPA, are provided in the enclosed Natura Impact Statement prepared by Verdé Environmental Consultants.

# Landscape Strategy & Management, Amenity Space, etc.

- TOR referred to the Landscaping Strategy and Design Report, Landscape Masterplan, areas 1-3 and sections submitted for the LRD Meeting. 15% Public Open Space is now required as per Variation to the MCDP with an accompanying statement. This cannot include lands that are zoned as F1. This must be usable and functional open space. A hierarchy of active and passive uses, and a detailed breakdown should be provided. The applicant must demonstrate the usability of the spaces. SUDs in public open space should not affect the use of the POS. Details of play equipment and natural play spaces to be provided.
- She noted that the applicant intends to provide an Arboricultural Assessment at the application stage, boundary treatment, street planting and location of services, etc. A Hedgerow Survey should also be provided.
- Regarding Boundary Treatment, the applicant was advised that timber panelling is not permitted in rear gardens and must comply with the requirements of Chapter 11 of the MCDP (DM Standards).
- Public Art is required and can be provided by way of payment or proposal with Arts Officer. It is recommended that this features in the public open space.
- The Landscaping Strategy and detailed, site-specific Planting Schedule should be guided by the All-Ireland Pollinator Plan and contain native species, indigenous to the area and retain existing hedgerows and trees wherever possible.
- A detailed breakdown of Private and Communal Spaces to be provided in accordance with the MCDP (as varied). Separation distances to be addressed (as discussed above).

In response to the above points, we note that the proposal provides 16.9% of the A2 zoned lands as useable and functional public open space in addition to the delivery of the landscaped public park to the north of the site. A hierarchy of active and passive uses, and a detailed breakdown of the various public open spaces, their useability and the provision of play equipment and natural play spaces is provided in the enclosed Landscape Design Statement prepared by Cunnane Stratton Reynolds.

It is noted that the no SUDs features affect the use of the public open spaces. Further, the application is accompanied by a suite of arboricultural documentation, including a Hedgerow Survey and an Arboricultural Assessment, as prepared by Cunnane Stratton Reynolds. A detailed breakdown of private and communal amenity spaces is provided within the aforementioned Landscape Design Statement.

It is confirmed that the scheme designed by Cunnane Stratton Reynolds has been guided by the provisions of the All-Ireland Pollinator Plan with the planting and landscaping comprising native species, indigenous to the area and existing hedgerows and trees retained wherever possible.

It is noted that the boundary treatment has been amended as guided with a combination of 1.8m concrete post/panel fence, 2m brick finish block wall and 2m render finish block wall now being used to separate rear gardens as considered appropriate in Chapter 11 of the Meath County Development Plan. With regards to the provision of public art, it is herein confirmed that the applicant is willing to provide same or a contribution in lieu by way of compliance should permission be granted for the proposed development.

## Housing Part V/ LDA (Part 9) Requirements/ Universal Design

- TOR stated that comments from the Housing Dept. and relevant changes will be highlighted in the LRD Opinion. She noted the location of the Part V units shown, which are dispersed through development to satisfy requirements. The applicant was advised to liaise with the Housing Dept. regarding any amendments.
- Variation no. 3 to MCDP introduced a requirement for Universal Design units within the scheme (an increase to) 15-30% of units and the applicant must provide a UD Statement. Units should be in accordance with 'Universal Design Guidelines for Homes in Ireland' (NDA) as per SH OBJ 22 and details are to be provided in a summary table by the applicant.

In response to the above points, we confirm that the Part V units remain appropriately dispersed throughout the site. We further confirm that 15.25% of the proposed units are compliant with the with 'Universal Design Guidelines for Homes in Ireland' NDA per SH OBJ 22 of the MCDP.

## Community Safety Statement

Variation no. 3 to the MCDP also included the requirement for a Community Safety Statement.
This relates to the in-built safety design elements of the development, including defensible
spaces in front of apartments/ houses, public lighting, which is appropriately placed and not
affected by landscaping, active street frontage to promote passive supervision, etc.

With regards to community safety, the Meath County Development Plan states that a community safety audit is to be prepared to ensure a high level of safety and security is maintained including, overlooking, passive surveillance, street lighting and clear accessible routes. It is noted that no parameters r guidance have been provided within the Meath County Development Plan as to the specific information to be presented in a such an audit. In this context, we confirm that the scheme has been appropriately designed to ensure a high level of safety through the active overlooking and surveillance of all shared spaces, the road layout is clear and legible and lighting is designed to ensure that residents always feel safe.

## Social Infrastructure Assessment (SIA)

- TOR confirmed that a Social Infrastructure Assessment must form part of any application, taking account taken of the capacity of local schools, healthcare facilities, childcare facilities, community facilities, recreational facilities, retail and other services, etc. (typically within 2km). She noted that the applicant intends to provide this for the application. Access to healthcare facilities, other community facilities should be addressed including the connectivity to same.
- The childcare assessment should be consistent with the SIA for the provision of adequate facilities including sufficient internal space and external play area. The developer is urged to consult with childcare operators who may be interested in the site and ensure the design is appropriate to their requirements and uptake. The applicant should consult the Meath County Childcare Committee.
- A Schools Assessment should be undertaken and consider Dept. of Education guidance and publications, noting that there were proposals regarding schools' provision on this site in the past.

In response to the above points, we confirm that the subject application is accompanied by a Social Infrastructure Assessment which has been prepared by this office having due regard for the guidance provided above. The SIA is contains both a Childcare Assessment and a Schools' Assessment sufficient to satisfy the requests of Meath County Council set out above.

## **Cultural Heritage**

- The Conservation Officer has referred to several monuments in the vicinity of the development and the potential visibility from Oldbridge Estate and the Battle of the Boyne Site and Brú na Bóinne World Heritage site, therefore a Visual Impact Assessment needs to be provided with the application to rule out any visual interference or negative impact that this proposal would have on the setting and context of this historic protected sites. Further information regarding the VIA would be included in the LRD Opinion.
- MCC's Archaeologist notes the site adjoins a buffer zone which protects the monuments of Newgrange, Knowth and Dowth and the documentation submitted - Archaeological Impact Assessment and Method Statement. It is considered that this document provided gives good background information and mitigation, however there are untested areas, and specific issues will be highlighted in more detail in the LRD Opinion.

In response to the above points, we confirm that the enclosed EIAR includes a Landscape Visual Impact Assessment, as prepared by Cunnane Stratton Reynolds, and an Archaeological Impact Assessment and Method Statement as prepared by Archaeology and Heritage Consultancy. Both aforementioned documents have been prepared having due regard for the guidance contained within the LRD Opinion.

## Other Environmental Issues

 TOR advised applicant to consult with the Environment Section regarding the Construction Environment Management Plan (CEMP), C&D WMP, Operational WMP, Article 27 requirements, etc. The CEMP should address pest control, and an Ecological Clerk of Work should be employed to oversee implementation of mitigation measures. Bin storage must be easily accessed, comprise solid screening (i.e. brick or similar) and methods of cleaning down.

- The development will be susceptible to noise from the Motorway (200m to the M1) to the west EPA Noise Mapping/ MCC Noise Plan are to be reviewed, and the applicant is required to submit a Noise Impact Assessment. The location of the crèche and outdoor space should be considered in this assessment. Noise insultation requirements and other design requirements including noise mitigation measures should be addressed in the proposal with revisions made as necessary.
- The Sustainability and Energy Efficiency design proposals (and a Statement) must be provided for the development.

In response to the above points, we confirm that the subject application is accompanied by the referenced management plans, a Noise Impact Assessment and a Sustainable and Energy Statement. Each of the aforementioned documents have been prepared having due regard for the above guidance.

## Other Services/ Any Other Issues

- Taking in Charge & Management Company TOR stated that the applicant must outline the proposed areas which are to be Taken in Charge (TIC) and a Management Company is required. A TIC map must consider the Public Lighting requirements.
- Public Lighting the applicant has stated that this will be provided for the LRD Application. As
  per the details submitted, the site is elevated c. 10 metres above the riverbank. Therefore, the
  impact of lighting on bats and landscaping must be considered, together with the potential impact
  on the SAC, SPA, River Boyne + Boyne Estuary, etc.
- Telecoms/ Electrical The requirements of ESB must be considered with any electrical infrastructure crossing the site. To develop an appropriate EV Charging Strategy, the applicant is urged to consult with ESB early in the process.
- Broadband Officer Broadband and telecommunication networks have not been designed for this development. All units must be serviced in compliance with the Meath County Development Plan guidance and the EU Gigabit Infrastructure Act. In the event of a grant of permission, plans should be provided to MCC prior to commencement.
- Estate Names 'Boyne Ridge' is the proposal on the CGIs. The applicant is referred to Chapter 11 of the MCDP regarding requirements for Estate Names and the details to be submitted.
- Fire Safety The applicant should address all the requirements of the Fire Safety regulations.

The subject application is accompanied by a Taking in Charge Drawing, which considers public lighting requirements, as prepared by NDBA Architects. The potential impacts of lighting on site have been considered within the suite of environmental documentation prepared by both DNV and Verde Environmental. The proposal has been considered in the context of ESB requirements and existing infrastructure relative to the subject site. The scheme has been designed with due regard for the fire safety regulations and pre-commencement requirements for broadband infrastructure.

We acknowledge that Boyne Ridge has been referenced as the scheme name in preliminary documentation, this name is considered appropriate due to the geographical position of the site, on elevated land relative to the Boyne River. The Irish translation for Boyne Ridge is Druim Boine and whilst we confirm the applicant's request for this name to be considered as part of the subject application, the applicant is equally willing to receive a request requiring a formal compliance submission in relation to the naming of the scheme by way of condition, should permission be granted.

Following the Section 32 LRD Consultation Meeting, Meath County Council subsequently issued a Notice of LRD Opinion on 1<sup>st</sup> April 2025, which identified that an Appropriate Assessment and an Environmental Impact Assessment would be required for the proposal to constitute a reasonable basis for an application for a Large-Scale Residential Development. In addition, the Opinion stated that 43 no. items of further information should be submitted with any LRD application.

Further, we confirm that the enclosed Statement of Response to Pre-Application Consultation Opinion has been prepared by Hughes Planning and Development Consultants, detailing how each of the items outlined in the pre-application consultation opinion from Meath County Council have been addressed in full by the applicant and design team prior to lodgement of this application. We confirm this office's opinion that the subject proposal has been designed in accordance with the guidance provided by the Planning Authority of Meath County Council at pre-application stage. The following sections of this report will present the proposed development in greater detail before identifying and discussing all relevant planning policy which pertains to the subject proposal.

# 5.0 Proposed Development

The proposed development, as designed by NDBA Architects, involves the construction of a residential housing scheme of 249 no. units comprising 170 no. houses, 16 no. duplex units accommodating 32 no. apartments and 11 no. apartment blocks (8 no. three-storey blocks and 3 no. four-storey blocks) accommodating a total of 47 no. apartments and a creche facility (411sq.m). With regards to unit mix, we would note the following breakdown:

1 Bedroom Units	38 No.	38 No. Apartments & 0 No. Houses	15.3%	of total
2 Bedroom Units	78 No.	41 No. Apartments & 37 No. Houses	31.3%	of total
3 Bedroom Units	111 No.	0 No. Apartments & 111 No. Houses	44.6%	of total
4 Bedroom Units	22 No.	0 No. Apartments & 22 No. Houses	08.8%	of total

The layout of the scheme has been informed by the topography of the subject site, its proximity to the M1 motorway and the provisions of the enclosed Archaeological Impact Assessment as prepared by Archaeology and Heritage Consultancy Ltd.



Figure 24.0 Proposed site layout plan.

The proposal has a housing density of 36 dwellings per hectare calculated using the net site area, that is land zoned for residential development, of 6.92 hectares. The total quantum of public open space extends to 1.17 hectares -16.9% of the site based on the net site area of 6.92 hectares, or 2.65 hectares -28.8% of the site, based on the gross site area of 9.2 hectares.

Each residential unit is provided with private amenity space in the form of either a rear garden, for the proposed houses, or a balcony/terrace, for the proposed apartments. The proposal provides vehicular parking for every residential unit with dedicated vehicular parking provided for the creche. Each house will be provided with on curtilage vehicular parking and bin storage whilst each apartment block will have shared access to adjoining bin stores, car parking bays and bicycle parking bays.

The following architectural drawing extracts will present each individual type of built form proposed as part of the subject application.

## **Apartment Building A1/A2**

A total of 8 no. type A1/A2 apartment buildings are proposed under the subject application with each three-storey block accommodating 4 no. apartments, specifically 2 no. one-bedroom and 2 no. two-bedroom apartments.

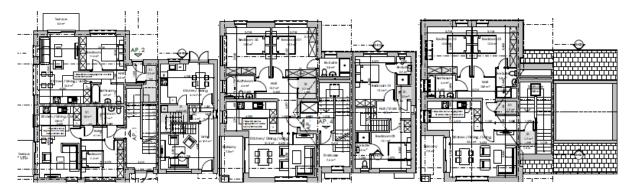


Figure 25.0 Ground (I), first (centre) and second (r) floor plans for apartment building A1/A2.



Figure 26.0 Front (I) and rear (r) elevations of apartment building A1/A2.

## **Apartment Building A3**

A total of 3 no. type A3 apartment buildings are proposed under the subject application with each fourstorey block accommodating 3 no. apartments, specifically 2 no. one-bedroom and 3 no. two-bedroom apartments.

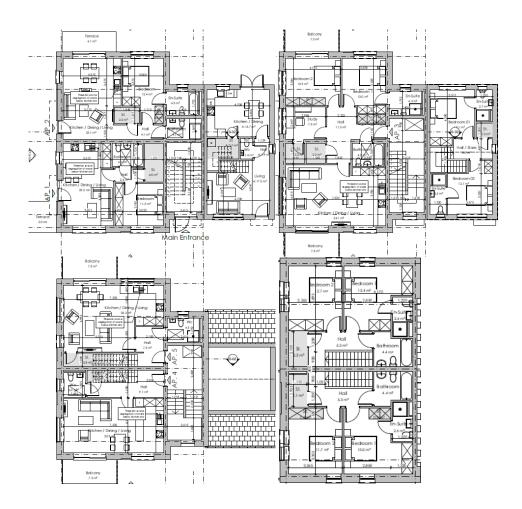


Figure 27.0 Ground (top I), first (top r), second (bottom I) and third (bottom r) floor plans for apartment building A3.



Figure 28.0 Front (I) and rear (r) elevations of apartment building A1/A2.

# **Duplex Apartment Building**

A total of 16 no. duplex apartment buildings are proposed under the subject application with each three-storey block accommodating 2 no. apartments, specifically 1 no. one-bedroom apartment and 1 no. two-bedroom apartment.

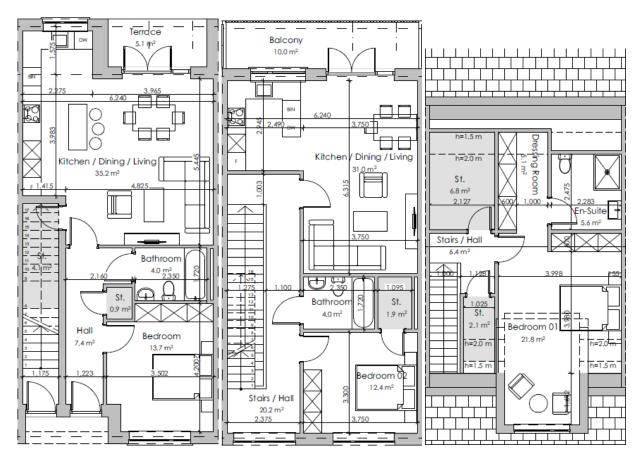


Figure 29.0 Ground (I), first (centre) and second (r) floor plans for a mid-terrace duplex apartment building.



Figure 30.0 Front (I) and rear (r) elevations of duplex apartment building.

# **Creche Facility**

A three-story creche facility extending to 411sq.m is proposed under the subject application. The facility will have dedicated areas for external play at ground and second floor levels and is situated within close proximity to the central and northern areas of public open space. The facility has been designed to accommodate 58 no. children, thus exceeding the total number of childcare spaces (53 no.) which the proposed development is considered to necessitate per the provisions of the enclosed Social Infrastructure Audit as prepared by Hughes Planning & Development Consultants.

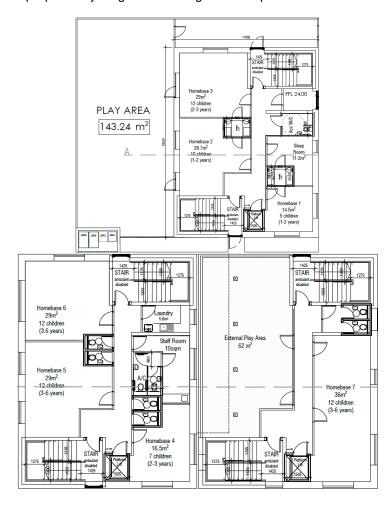


Figure 31.0 Ground (top), first (bottom left) and second (bottom right).



Figure 32.0 Front (I) and rear (r) elevations of creche facility.

A total of 23 no. House Type 2.1 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 81.8sq.m and provides two bedrooms.

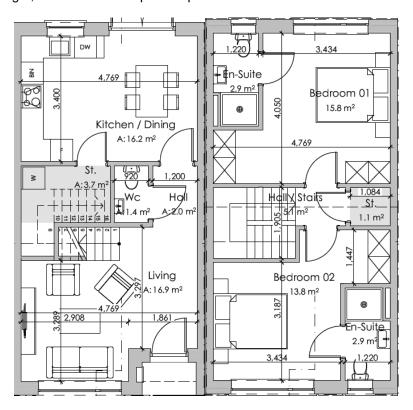


Figure 33.0 Ground (I) and first (r) floor plans of House Type 2.1



Figure 34.0 Front (I) and rear (r) elevations of House Type 2.1.

A total of 8 no. House Type 2.4 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 83.8sq.m and provides two bedrooms.

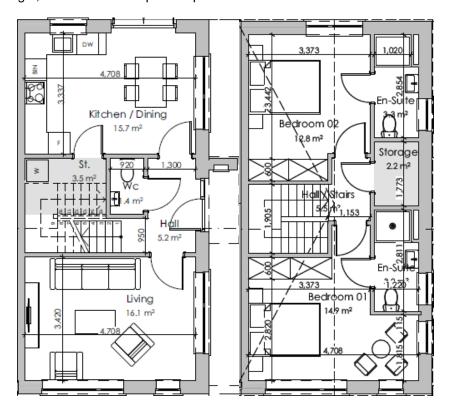


Figure 35.0 Ground (I) and first (r) floor plans of House Type 2.4.



Figure 36.0 Front (I) and rear (r) elevations of House Type 2.4.

A total of 6 no. House Type 2.5 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 81.6sq.m and provides two bedrooms.



Figure 37.0 Ground (I) and first (r) floor plans of House Type 2.5.



Figure 38.0 Front (I) and rear (r) elevations of House Type 2.5.

A total of 16 no. House Type 3.2 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 99.3sq.m and provides three bedrooms.

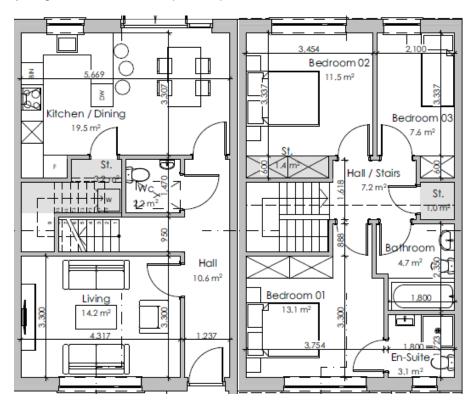


Figure 39.0 Ground (I) and first (r) floor plans of House Type 3.2.



Figure 40.0 Front (I) and rear (r) elevations of House Type 3.2.

A total of 22 no. House Type 3.4 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 101.1sq.m and provides three bedrooms.

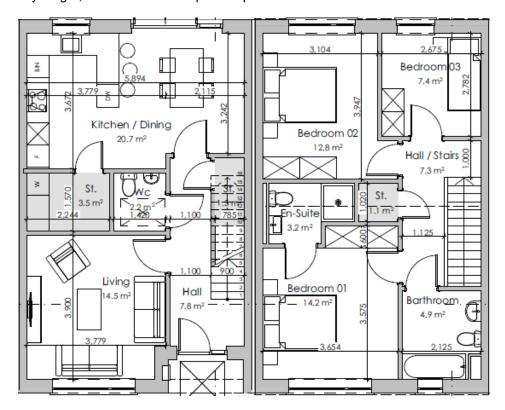


Figure 41.0 Ground (I) and first (r) floor plans of House Type 3.4.



Figure 42.0 Front (I) and rear (r) elevations of House Type 3.4.

A total of 4 no. House Type 3.5 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 95.2sq.m and provides three bedrooms.

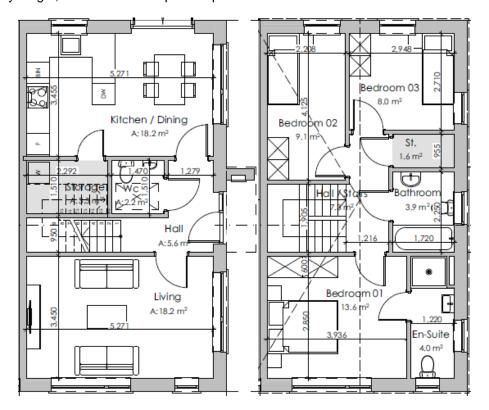


Figure 43.0 Ground (I) and first (r) floor plans of House Type 3.5.



Figure 44.0 Front (I) and rear (r) elevations of House Type 3.5.

A total of 14 no. House Type 3.6 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 92.2sq.m and provides three bedrooms.

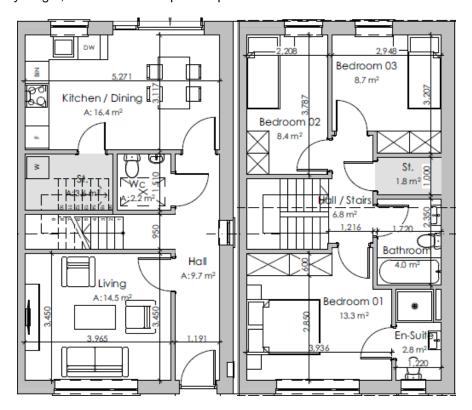


Figure 45.0 Ground (I) and first (r) floor plans of House Type 3.6.



Figure 46.0 Front (I) and rear (r) elevations of House Type 3.6.

A total of 46 no. House Type 3.7 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 100.2sq.m and provides three bedrooms.

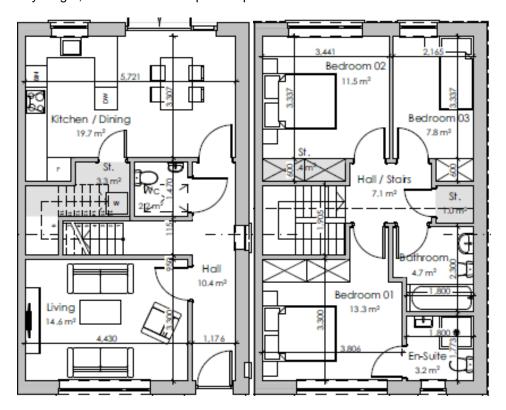


Figure 47.0 Ground (I) and first (r) floor plans of House Type 3.7.



Figure 48.0 Front (I) and rear (r) elevations of House Type 3.7.

A total of 9 no. House Type 3.8 are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 104sq.m and provides three bedrooms.

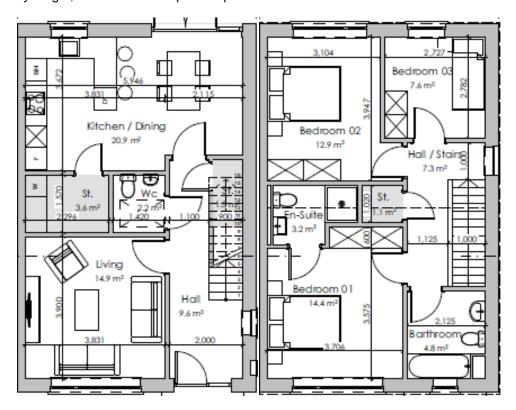


Figure 49.0 Ground (I) and first (r) floor plans of House Type 3.8.



Figure 50.0 Front (I) and rear (r) elevations of House Type 3.8.

A total of 22 no. House Type 4.1are proposed as part of the subject application. Each of these houses is of two-storey height, extends to 128.4sq.m and provides four bedrooms.

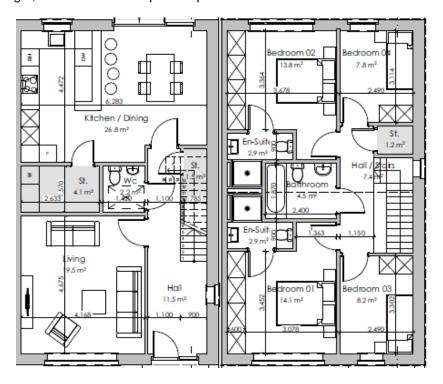


Figure 51.0 Ground (I) and first (r) floor plans of House Type 4.1.



Figure 52.0 Front (I) and rear (r) elevations of House Type 4.1.

# 6.0 Planning Policy Context

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

- Project Ireland 2040 National Planning Framework;
- National Development Plan 2021-2030;
- Urban Development and Building Heights Guidelines for Planning Authorities, December 2020;
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024);
- Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019);
- Housing For All A New Housing Plan for Ireland (2021);
- Smarter Travel: A Sustainable Transport Future A New Transport Policy for Ireland (2009);
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025);
- Quality Housing for Sustainable Communities Guidelines for Planning Authorities (2007);
- Meath County Development Plan 2021-2027;
- Planning Strategy for Greater Drogheda Area; and
- South Drogheda Urban Area Plan.

## 6.1 Project Ireland 2040 - National Planning Framework

The National Planning Framework (NPF) is the Government's high level strategic plan for shaping the future growth and development of our country out to the year 2040. Initially adapted in 2018, the framework was created to achieve more balanced and concentrated growth, particularly within the five major cities in Ireland. The NPF provided a summary of the key national targets for structuring the overall national growth anticipated, promoting regional parity, creating accessible centres of scale and securing compact and sustainable growth. The clear policy direction at a national scale was to grow our regions and accommodate new housing within or adjacent to existing built-up areas. It must be acknowledged that in order to accommodate the population growth envisaged by the National Planning Framework, that there is a requirement for an increased output of a mix of residential units in the years up to 2040 to meet a growing demand.

Following a decision of Government in June 2023, the preparation of a revised NPF commenced, which resulted in the National Planning Framework – First Revision, published in April 2025. The revised NPF responds to updated projections for population growth anticipating that Ireland's population will increase by approximately one million people between the period of 2022 and 2040. The NPF now plans for a population of 6.1 million by 2040, up from 5.85 million in the 2018 NPF. With regards to managing growth, the National Planning Framework sets out that more balanced growth also means more concentrated growth and that the key five cities of Dublin, Cork, Limerick, Galway and Waterford are targeted for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.

In addition, National Strategic Outcome No. 1 'Compact Growth', provides that the NPF is focused on the careful management of the sustainable growth of compact cities, towns and villages in order to add value and create more attractive places in which people can live and work. To achieve this outcome, there must be effective density and consolidation supported by an increase in the proportion of more compact forms of development rather than more urban sprawl as a top priority. We would note the following commentary from the first revision of the NPF with regards to the location of the subject application:

'The important regional role of Dundalk and Drogheda is recognised in the Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly Area. It will also be necessary to prepare co-ordinated strategies for Dundalk and at settlement level to ensure that they have the capacity to grow sustainably and secure investment as key centres on the Drogheda-Dundalk-Newry cross-border network.'

Several objectives outlined in Appendix 1 of the National Planning Framework have been identified to ensure proper planning and sustainable development. We consider that the following national policy objectives are of relevance. These objectives reflect the type of growth that is sought in line with the goals of the NPF:

National Policy Objective 3

Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million;

National Policy Objective 9

Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.

National Policy Objective 12 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 13 Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

National Policy Objective 15 Apply a tailored approach to urban development, linked to the Rural and Urban Regeneration and Development Funds, with a particular focus on:

- Dublin;
- The four Cities of Cork, Limerick, Galway and Waterford;
- Strengthening Ireland's overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West City Region and **Drogheda**-Dundalk-Newry on the Dublin-Belfast corridor;
- Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;
- Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities;
- Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes:
- In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.

National Policy Objective 20 In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 22 In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

National Policy Objective 37 Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

National Policy Objective 38

Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

**National Policy Objective 42** To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.

**National Policy Objective 43** Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

The proposed development is appropriately sited within the suburban area of Drogheda close to existing residential schemes and proximate to existing services and, as such, does not constitute urban sprawl. The location of the site will ensure that growth is contained within the boundary of an existing settlement, and will offer '*improved housing choice, transport mobility and quality of life*.' Furthermore, the proposed development provides for the contribution of a publicly accessible area of parkland for the benefit of the immediate and wider community. The proposed development is consistent with the above national policy objectives as it involves the development of greenfield land within the environs of Drogheda proximate to its associated amenities and services.

## 6.2 National Development Plan 2021-2030

The National Development Plan 2021-2030 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein. The National Development Plan demonstrates the Government's commitment to meeting Ireland's infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period. This includes investment in high quality integrated public and sustainable transport systems as well as health and education.

Drogheda is connected to Dublin City Centre via rail and bus links and has interchange services with existing commuter rail, DART, LUAS, and numerous bus services along its route. The subject development at Rathmullan Road is considered to aid in meeting the targets and objectives of the National Development Plan through the more efficient use of an underutilised site within an existing built-up area, whilst providing the critical mass required to sustain and support public transport services. The proposed development is considered to reflect the type of sustainable development which is sought throughout National Policy with regards to the appropriate development of under-utilised sites.

#### 6.3 Urban Development and Building Heights - Guidelines for Planning Authorities (2020)

These guidelines are intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework. These guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas. The rationale for consolidation and densification to meet our accommodation needs applies in relation to locations that development plans and local area plans would regard as city and town centre areas as well as areas in and around existing urban areas and suburban areas.

This policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development through the planning process, particularly at local authority and An Comisíun Pleanála levels. Increasing prevailing building heights is deemed to have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development. Increased density and height of development within the footprint of developing sustainable mobility corridors and networks, where substantial investment in public transport infrastructure has been made as part of Project Ireland 2040, is a key element of the subject guidelines.

#### 6.3.1 Response to Specific Planning Policy Requirements (SPPRs)

It is noted that the Urban Development and Building Heights – Guidelines contain 4 no. Specific Planning Policy Requirements (SPPRs) which Planning Authorities and An Comisíun Pleanála are required to have regard for with the SPPRs taking precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. We would note and respond to the SPPRs contained within the Urban Development and Building Heights – Guidelines as follows:

#### SPPR 1

In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

The subject proposal provides for a residential density of 36 units per hectare based on the provision of 249 no. residential units upon a total of 6.92 hectares of land which is zoned for residential development. It is further noted that building heights on site range between two-four storeys.

It is considered that the density of the proposed development is appropriate given the site's location at the edge of the development boundary of a Regional Growth Centre. It is noted that the proposed density is inside the applicable density range guided by the recently adopted Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) as will be discussed in the following section of this report.

Further to the above, it is considered that the height range provided within the proposed development is appropriate relative to the site's proximity to the centre of Drogheda. It is noted that the scheme presented to the Planning Authority at the Section 247 and Section 32 meetings was limited to a maximum height of three-storeys. For the final application, the building height range has been amended, following the Planning Authority's guidance to increase building height at appropriate locations within the development to include a number of four storey apartment blocks.

The proposed development is considered to respond in a positive way to the established pattern and form of development and the scale of development in the surrounding area with the height, scale and massing of the development responding positively to and enhancing the established pattern of development in accordance with Subsection v 'Built Form' of Section 4.4 'Key Indicators of Quality Design and Placemaking' of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

Notwithstanding the fact that the Meath County Development Plan 2021-2027 identifies Drogheda as a location for increased building height, it is considered that the site of the subject development at the edge of the development boundary of a Regional Growth Centre presents a need for building height to be moderated relative to existing built form. In this regard we would note that the proposed height represents a departure from the maximum height of residential units within the adjoining estates to the immediate east of the site which are wholly limited to two-storey buildings.

#### SPPR 2

In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans<sup>2</sup> could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.

With regards to the above SPPR, we have noted that the uses which can be delivered upon the subject site are limited to those permitted within the applicable 'A2' and 'F1' zoning objectives. Furthermore, the viability of alternative uses on an edge of centre site must also be considered. In this regard, it is considered that the residential and childcare uses which are proposed at this location are both functional and viable with the height range of built form appropriate relative to the site's wider context. It is further considered that the landscaped area of public open space to the north of the site also represents a significant planning gain for the local community.

#### SPPR 3

It is a specific planning policy requirement that where;

(A)

- 1. <u>an applicant for planning permission sets out how a development</u> proposal complies with the criteria above; and
- the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.
- (B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority ( where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme
- (C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.

Having regard for the emboldened/underlined wording above, we respond to the referenced development management criteria in the following terms:

## At the Scale of the Relevant City/Town

The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.

The subject site is located within 3.5km of Drogheda Town Centre which is an effective hub for general amenities and facilities. With regards to public transport, the site entrance is situated within 350m of a bus stop serviced by Bus Eireann Route 173 which provides direct connection to the centre of Drogheda. The site is located within 2.5km and 3.6km of Drogheda's respective bus and train stations, both of which offering high frequency, high-capacity public transport services to Dublin City Centre and other major employment hubs. The site is served by Drogheda Bus Station, approximately 2.8km from the subject site. The M1 Motorway, located 2.5km from the site, connects Drogheda to Dublin, while also acting as the primary road connecting Dublin to Belfast.

Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

The application is accompanied by a Landscape and Visual Impact Assessment, as prepared by Cunnane Stratton Reynolds. The subject site is not located within an architecturally sensitive area given the standard form and design of the adjoining residential estates. Due to the size of the subject site, it is of sufficient size to provide its own unique sense of character and public realm.

In this regard, we have note the unique extent of public open space which is provided across the wider scheme with the future residents effectively provided with more than the required quantum of open space within the residentially zoned land in conjunction with an additional landscaped park to the immediate north. The scheme has been appropriately designed relative to the site's topography and position relative to local landmarks and views and will provide an entirely unique sense of place for future residents.

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

It is considered that the proposed scheme will provide a unique sense of place given the extent of public open space being provided across the entire site. Further to the quantum of open space, it is also noted that the variety of open spaces in conjunction with the varying design of the residential units serves to create an attractive visual aesthetic across the site which is defined by a number of character areas as detailed in the enclosed Architectural Design Statement prepared by NDBA Architects.

## At the Scale of District/Neighbourhood/Street

The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape

It is considered that the proposed development appropriately responds to the natural and built environment through providing a density and range of building heights which reflect the quasi-urban nature of a site located on the edge of a Regional Growth Centre.

The scheme has been designed to present an attractive aesthetic to the immediate public realm, based on incorporating the existing level changes within the area, which serves also to allow for direct connection to the immediate neighbourhood and provides a basis for strengthening the local community.

The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.

The subject proposal cannot be considered to present any form of monolithic development. The design of the various streets within the scheme has been amended across the pre-planning stages to provide the final layout which duly illustrates an appropriate network of streets which are each proximate to areas of public open space.

The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).

The subject application is accompanied by a Flood Risk Assessment, as prepared by JBS Consulting, which confirms the proposal accords with the relevant requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).

The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.

The relationship between the proposed development and the immediate public realm is considered appropriate so as to ensure that the future residents can be integrated into the community in a cohesive manner. It is considered that existing residents within the local community will be drawn to the area of public open space provided on site, both through the main site access and the direct links to Rathmullan Road to the north, thus offering a natural means of connecting existing and future residents.

The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

The proposed development provides for the introduction of residential apartment blocks within the immediate area and effectively provides for the first purpose-built one-bedroom units within the locality thus providing both new building/dwelling typologies and enhancing unit mix within the area.

# At the Scale of the Site/Building

The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

The proposed development has been purposefully designed to maximise access to natural daylight and minimise loss of light. All buildings are orientated so as to minimise overshadowing and ensure appropriate ventilation. Each building within the scheme has an attractive outlook towards the wider site.

Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

we would ask the Planning Authority to have due regard for the enclosed Sunlight, Daylight & Shadow Assessment, as prepared by Chris Shackleton Consulting. We would note the following key points to consider in terms of the analysis findings:

#### **Target Illuminance**

- 92% (98% including marginals) of rooms comply with the BS/EN 17037 Annex NA room targets for 50% of the floor area tested.
- Marginal GFL Living rooms in Duplexes, compensated by being oversized see commentary.
- The average compliant areas achieving the relevant target Lx for
- all bedrooms is 91% and
- all Living/Kitchen spaces 74%
- both are well in excess of the required 50%

#### Sunlight to rooms:

• 100% comply with the 1.5hr BRE test on the 21st March.

## Sunlight on the Ground SOG (Shadow)

- 92% of the provided shared amenity spaces pass the BRE requirement.
- 1x North facing space is marginal receiving 33% qualifying sunlight on the 21st March.
- The tested spaces generally comply with the requirements of the BRE Guidelines.

# Change/Impact to neighbouring buildings in the adjoining residential areas. Skylight- VSC

- 100% of the tested windows comply with the 27%, 0.8 ratio requirements for habitable rooms.
- The average change ratio for VSC is 1.00

## Sunlight Annual Probably Sunlight Hours & Winter Probable Sunlight Hours

- 100% of tested windows comply with the annual APSH and
- 100% with the winter WPSH requirements for sunlight or overall requirement.
- The average change ratio for sunlight is APSH:1.00 and WPSH: 1.00

We would note that 92% of rooms comply with the BS/EN 17037 Annex NA room targets for 50% of the floor area tested with this percentage increasing to 98% if we marginal results are included. We would note that compensatory measures are allowed for as discussed on page 23 of the Sunlight, Daylight & Shadow Assessment. A number of duplex units are provided with additional living space (35.2sq.m) relative to the minimum required floor area (23sq.m) whilst a number of apartment benefit from south/west facing balconies and are within 60m of 2 no. large public open space areas.

# **Specific Assessments**

Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

The proposed height range of two-four storeys is not considered to be of a sufficient scale as to warrant the preparation of a wind and microclimate report and, accordingly, no such report is included with this application.

In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.

The subject application is accompanied by an Ecological Impact Assessment (EcIA) as prepared by Verde Environmental.

An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.

The proposed height range of two-four storeys is not considered to be of a sufficient scale as to impact telecommunication channels and, accordingly, we note that no such assessment is included with this application.

An assessment that the proposal maintains safe air navigation.

The proposed height range of two-four storeys is not considered to be of a sufficient scale as to impact safe air navigation and, accordingly, we note that no such assessment is included with this application.

An urban design statement including, as appropriate, impact on the historic built environment.

An Architectural Design Statement is enclosed with this application as prepared by NDBA Architects. This application is also accompanied by an Archaeological Impact Assessment as prepared by AHC Ireland. It is noted that the site is not adjoined by an historic built form and, accordingly, no conservation-specific documentation is included with this application.

Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.

The subject application is accompanied by an Environmental Impact Assessment Report (EIAR), as prepared by DNV and an Ecological Impact Assessment (EcIA), Appropriate Assessment Screening Report (AASR) and Natura Impact Statement (NIS), as prepared by Verde Environmental.

# SPPR 4

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.

The subject development, as will be presented in the following section of this report, accords with the applicable density range guided for sites at similar locations and the density requirements set out in the Sustainable Residential Development and Compact Settlements Guidelines and the Meath County Development Plan 2021-2027.

The building heights, unit mix and density proposed at the subject site are considered to be consistent with the above policy content, and with the pattern of development surrounding the subject site. The proposal provides for building heights ranging from two-four storeys. Whilst representing a departure from the height of adjoining residential schemes to the immediate east, it is noted that the relatively increased building height has been guided by the Planning Authority and is considered to provide for an appropriate scale of development in considering the site's location and context.

As detailed previously, informed by and in response to the Planning Authority's observations at the Section 247 and Section 32 LRD consultation meetings, the final proposal has been amended and now includes three additional apartment blocks, whilst also providing duplex apartment buildings of three-storey height alongside traditional two-storey houses. The scheme improves the variety of tenure types within the area through the introduction of one-bedroom units also. The authority is also referred to the Part V housing proposal, informed again by the authority's stated preference (as detailed above).

As presented above, it is considered that the proposed development scores highly when assessed against the development management criteria set out in the guidelines as, aside from being a well-connected site, the proposal will:

- Enhance the character, built environment and public realm of the area, featuring well considered
  high quality materials and appropriately responds to the scale of residential development on the
  surrounding area;
- Maximise access to natural daylight, ventilation and views due to the positioning of housing units and apartment buildings; and,
- Have no impact in relation to overshadowing and loss of light due to its separation from existing residential developments in the surrounding area.

Overall, we confirm that the proposed development is in full compliance with the key guidance included within the Urban Height Guidelines in that it provides for the appropriate densification of a zoned and serviced site at a scale relative to the site's suburban location and with an appropriate mix of unit types and sizes, suitable for a range of tenures.

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

As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009). With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policy and guidelines pertaining to the planning and development of urban and rural settlements. Under said guidelines, settlement types are categorised on their area types and density ranged. Herein, the subject site is located in Drogheda which means it can be described under the category of 'Regional Growth Centres'. The key priorities for the growth of Regional Growth Centres in order of priority are to:

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

(f) deliver sequential and sustainable urban extension at suitable locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the settlement.

Notwithstanding the foregoing, Section 3.4 'Areas and Density Ranges Regional Growth Centres' of the subject guidelines provides different types of areas within regional growth centres, with the subject site being classified as 'Regional Growth Centre - Suburban/Urban Extension' with the following commentary provided in respect of such areas:

'Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that <u>residential densities in the range 35 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Regional Growth Centres</u>, and that densities of up to 100 dph (net) shall be open for consideration at 'accessible' suburban/urban extension locations.'

A development of 249 no. units upon the subject site would achieve a residential density of 36 units per hectare as calculated on the basis of the residential zoned land within the red line boundary. The proposed density is at the lower end of the density range which is guided, but is considered to represent an appropriate balance between the need to ensure the efficient use of the subject land whilst preventing a scale of development which could appear overbearing relative to the comparatively lower density of development within the immediate area. In this regard, we would note the residential density of the immediately adjoining residential estates to the east at Riverbank, Oldbridge Manor and Highlands, as identified in Figure 1.0 of this report, range between 17.7-33.6 units per hectare as originally granted.

Compact growth has been recognised as key to the renewal of existing settlements, with an overall goal to reduce continued sprawl. The plan recognises the benefit of consolidation which improves access to services, ensures efficient use of land and allows for greater integration with existing infrastructure and public transport. It is accepted that compact growth is essential, particularly along transport corridors that support the more efficient use of energy and contribute to the achievement of net zero carbon emissions and other climate action targets by 2050. It is noted that the Compact Settlements Guidelines include 4 no. Specific Planning Policy Requirements (SPPRs) for which Planning Authorities must have direct regard for under Section 28 of the Planning and Development Act 2000 (as amended). In effect, these SPPRs supersede design guidance contained within local and county development plans. We would note and comment in respect of the design aspects to which the 4 SPPRs relate to as follows:

#### SPPR 1 Separation Distances

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

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

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.'

We would first note that the subject site is not located within a Strategic Development Zone.

We confirm that the separation distances provided within the proposed development have been designed to accord with the above SPPR. Whilst separation distances vary on site, 16m represents the minimum distance between opposing upper floor windows serving habitable rooms across the site. There is no specified minimum separation distance which has been adapted across the site in respect of opposing windows at ground floor level. It is to be noted that, per the provisions of SPPR 1, no specified minimum separation distance is required at ground floor level and that each application is to be determined on a case by case basis. We submit that the design of the subject development is such that no undue loss of privacy arises from the separation distances of ground floor windows.

Whilst it is noted that a large quantum of residential units on site avail of the minimum applicable standard for separation distance, it is also noted that all residential units on site exceed the minimum required floor area, thus providing a high standard of internal amenity relative to the applicable standard. Furthermore, all units meet and/or exceed the required standard for private amenity space and are provided both with an extent of public open space in excess of the required provision on the residentially zoned lands whilst also benefitting from direct access to the landscaped public park being delivered as part of the development.

It is thus considered that the future residents of the scheme will enjoy a high standard of residential amenity.

## SPPR 2 Minimum Private Open Space Standards for Houses

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

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

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

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

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

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.'

We would first note that the subject site is not located within a Strategic Development Zone, is not representative of a building refurbishment scheme and is not a site smaller than 0.25 hectares. Further,

we would note that all apartments and duplex units are provided private amenity space in accordance with the requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2025.

We confirm that the private amenity spaces serving houses within the proposed development have been designed to accord with the above SPPR. However, it is noted that each of the 170 no. houses provided on site surpasses the minimum sq.m figure which is applicable by more than 10sq.m. Effectively, the provisions of the above SPPR have been complied with in full for delivery of the subject proposal, however in no case are any houses designed on the basis of simply meeting the minimum requisite area.

## SPPR 3 Car Parking

'It is a specific planning policy requirement of these Guidelines that:

- (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.
- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on—street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.'

We would first note that the subject site is not located within a Strategic Development Zone

As the site is neither located within 500-1,000m of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; nor within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service the site is thus representative of a peripheral location per the provisions of the referenced table (Table 3.8) of the Compact Settlements Guidelines.

Accordingly, the maximum rate of vehicular parking is 2 no. spaces per dwelling. With 249 no. units proposed, the maximum quantum of vehicular parking which can be provided is 498 no. spaces. It is noted that 396 no. parking spaces are provided across the scheme with all 32 no. duplex apartment units and 47 no. apartment block units being provided with 1 no. space per unit. The 170 no. houses are served by 303 spaces, thus providing a ratio of 1.78 spaces per house, whilst the creche is served by 8 no. parking spaces and a further 6 no. visitor spaces are facilitated on site.

Excluding parking dedicated to the creche facility, the development provides 388 no. residential parking spaces or under 78% of the maximum permissible quantum. This extent of vehicular parking is considered appropriate given the site's location on the edge of a Regional Growth Centre and it is noted that all residential parking is accommodated within the curtilage of each individual house, duplex building or apartment block thus not affecting the visual amenity of the site and providing easy access for residents.

# SPPR 4 Cycle Parking and Storage

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

- (i) Quantity in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.
- (ii) Design cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.

Having regard for subsection (i) of the above SPPR, all residential houses on site are designed to facilitate the storage of bicycles within their ground level rear gardens. In addition, all ground floor units within the duplex buildings will facilitate the storage of bicycles within their ground level rear gardens. Each apartment block will be served by a dedicated bicycle storage shed within the communal amenity space to the rear whilst the upper-level duplex units will be served by shared bicycle stores.

With regards to subsection (ii) of the above SPPR, the standalone cycle storage facilities will be provided in dedicated facilities of permanent construction and will be provided in communal areas which support sage access.

Further to the above SPPRs, we note the wording of Policy and Objective 5.1 'Public Open Space' of the subject Guidelines as follows:

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

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area. In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

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

seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.

The provisions of the above SPPRs and Policy Objective have been considered as part of the design process for the subject proposal and will be further referenced where necessary in the relevant sections of this report. It is considered, having regard to the overarching focus on sustainable residential development and the creation of compact settlements which is the mandate of the subject guidelines that the subject proposal has been appropriately designed on the basis of the following reasoning:

- The design of the proposed development responds appropriately to its locational context in terms of its scale, massing and architectural treatment. It will provide an appropriate form of residential development that will represent a direct precedent for similar development within Drogheda.
- The location of the proposed development close to existing and future public transport routes will
  ensure good connectivity.
- By its nature, the proposed development provides a range in housing types to accommodate for a mix of the population demographic. With the growth of Drogheda as a whole, providing a range of dwelling types is considered an appropriate outcome with sustainably accommodating growth for the future. In terms of layout, the variety of open space areas will facilitate significant levels of interaction within the development.
- The proposed development, by reason of its location on an underutilised site, together with its density and layout, will promote the efficient use of land and of energy, including in relation to transport, and thereby minimise greenhouse gas emissions.
- The proposed design provides for a high-quality development of purpose-built residential dwellings and apartments/duplex units.
- The private open space areas, as well as the public open spaces areas, will afford a high standard of residential environment to future residents as well as residents of the surrounding area who will frequent the public open space areas provided within the development.

On the basis of the foregoing rational and density confirmation, it is considered that the subject proposal is in compliance with the applicable provisions of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

# 6.5 Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019)

The Regional and Spatial Economic Strategy for the Eastern and Midland's Regional Assembly (RSES) was published on 28<sup>th</sup> June 2019. It is a strategic plan and investment framework to shape future development and to better manage regional planning and economic development throughout the Region to 2031 and beyond. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives.

The RSES builds on the foundations of Government policy in Project Ireland 2040 and replaces the current Regional Planning Guidelines (RPGs). The RSES states that Drogheda is the fastest growing town in the Country in the most recent inter-census period. Drogheda is identified as a Regional Growth Centre in the plan. Regional Growth Centres are defined as:

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

The RSES states that Drogheda is the fastest growing town in the Country in the most recent inter-census period. Drogheda is identified as a Regional Growth Centre in the plan. The role of these Regional Growth Centres within the RSES is 'to serve as focal point to gain critical mass and to deliver positive impacts to their surrounding areas and enhance overall regional and national growth.'

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

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

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

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

Given the subject site is currently zoned for residential development and the ranking afforded the subject site, in relation to the prioritising of the release of residentially zoned land, in the Southern Environs of Drogheda Local Area Plan 2009-2015 (discussed further in Section 6.17 of this report), it is anticipated that the subject site will be earmarked for residential development in the Joint Urban Area Plan for Drogheda.

# 6.6 Housing for All - A New Housing Plan for Ireland (2021)

The 'Housing for All - A new Housing Plan for Ireland' was published in September 2021 as part of the Irish Government's 'Our Shared Future' programme which, in turn, sets out the Government's mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has

'access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering high quality of life.'

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

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

Each of the pathways comprises a comprehensive suite of actions to achieve the above referenced Housing Policy Objectives. These pathways are illustrated in the following extract. Pathway No. 3 'Increasing New Housing Supply' stipulates a number of key aspects to providing for new homes. It is also noted within that by 2040, an additional one million people will be residing in Ireland.

The state is acting decisively to activate supply across both public and private lands, which is critical to ensuring that new homes to be built over the next decade are located where housing demand is greatest and where there is good accessibility to employment, education, public transport, and other services and amenities.

In this context Section 3.1 of the Plan 'Increase Land Availability for Residential Development' states that:

'A steady supply of suitable and serviced zoned land is needed' further providing that 'Local Authorities and elected members play a key role in zoning enough land to meet residential housing requirements, while also respecting the requirements for balanced regional development and the need to prevent urban sprawl.'

We also make reference to the following objective as included within the Housing For All document:

Housing Pol Obj 11.2 Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.

In accordance with the above objective, we note that the Department of Housing, Local Government and Heritage's publication of the consultation paper for the *Sustainable and Compact Settlements Guidelines* for Planning Authorities – Proposed Policy Approach and the proposed scheme has been developed in cognisance of these new standards. The provision of additional residential units in Drogheda supports homeownership and affordability, will result in increased social housing provision and will provide for the efficient use of well-located lands which have capacity to comfortably absorb additional development.

The proposed development, as such, responds to a recognised need, at national level, for residential accommodation and for the growth of our smaller towns and villages in a compact and sustainable manner. The proposal is consistent with policy in this regard.

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

The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes. The subject site is located within 2.5 kilometres of the Drogheda town centre which features several local amenities such as shops, restaurants, entertainment venues etc.

Furthermore, the site is also situated within walking distance of bus stops along Rathmullan Road which serve Bus Route No. 173. In addition, the subject development provides public open space areas and a creche on site. Notwithstanding the age of the subject guidelines, it is noted that direct reference is made to same under the Meath Development Plan 2021-2027 in relation to these guidelines providing an appropriate benchmark for residential schemes to comply with in relation to room sizes, storage space, dimensions and overall floor areas for residential houses. As per Table 5.1 of the guidelines, the proposed house types comply with the minimum space requirements as shown overleaf. As demonstrated in the following table, all units proposed on-site meet/exceed the size standards set out within the 2007 quidelines.

Space Provision and Room Sizes for Typical Dwellings								
Dwelling Type Standard	Minimum Gross Floor Area	Main Living Room	Aggregate Living Area	Aggregate Bedroom Area	Storage Area			
4 Bed (6P) 2 Storey (3 no. units)	100sq.m	15sq.m	40sq.m	36sq.m	6sq.m			
Proposed	126.sq.m	19.5sq.m	45.1sq.m	43.8sq.m	7.1sq.m			
3 Bed (5P) 2 Storey (22 no. units)	92sq.m	13sq.m	34sq.m	32sq.m	5sq.m			
Proposed	106.3- 111.4sq.m	14.3- 15.3sq.m	34-35.8sq.m	32.2-33.7sq.m	5.2-7.9sq.m			
3 Bed (4P) 2 Storey (18 no. units)	80sq.m	13sq.m	30sq.m	25sq.m	4sq.m			

Proposed	98.8-102.3sq.m	14.5- 18.2sq.m	31.8- 37.2sq.m	29.3-31.2sq.m	4-5.4sq.m
2 Bed (4P) 2 Storey (43 no. units)	80sq.m	13sq.m	30sq.m	25sq.m	4sq.m
Proposed	87.2-91.4sq.m	16.5- 17.7sq.m	31.6-34sq.m	24.5-27.8sq.m	4.5-5.4sq.m

Figure 53.0 Assessment of proposed development against the minimum standards for room sizes, dimensions and overall floor areas included in Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007)

# 6.8 Urban Design Manual - A Best Practice Guide, 2009

The 'Urban Design Manual – A Best Practice Guide, 2009' is based around twelve questions that have been drawn up to encapsulate a full range of design considerations for residential development such as that proposed on the subject site. These questions are 'a distillation of current policy and guidance and tried and tested principles of good urban design.' This report reviews the proposed development in this context to address the key issues of design, scale, massing and integration with the fabric of the area while respecting the amenity of adjacent properties.

# (i) Context - How does the development respond to its surroundings?

The form, architecture and landscaping of the proposed development have been informed, but not determined, by the surrounding area. Existing views from various parts of the site and existing landscape features have been considered when creating the various neighbourhoods within the developments. Please refer to the Architectural Design Statement, as prepared by NDBA Architects, for further details on the evolution of the proposal. The development will be finished in materials of the highest quality to ensure it creates a distinct scheme with its own character while integrating well with adjacent houses.

Material selection has been approached with care to ensure durability, quality, and character. Two multi-brick tones—a red multi-brick and a cream multi-brick—form the primary cladding material for public-facing elevations.

These bricks offer a subtle variety of tone and texture, bringing visual richness and depth to façades. A projecting brick head detail is used selectively to provide articulation, compositional balance, further depth and a tactile quality. Render finishes, limited to side and rear elevations, provide contrast to the brick finishes.

Please refer to the aforementioned Architectural Design Statement, for further details.

## (ii) Connections - How well connected is the new neighbourhood?

The proposed development scheme has been designed to facilitate quality all-round access such as pedestrian, cyclist and vehicular access that links the site with Drogheda town centre. The proposed development features extensive pedestrian and cycle paths throughout the development and ties in with the surrounding areas existing cycle and pedestrian networks.

## (iii) Inclusivity - How easily can people use and access the development?

The proposed development includes a variety of dwelling types in various sizes and configurations. All units in the development are accessible for disabled access and have considered the principles of universal design. The proposed development presents a positive aspect to passers-by and pedestrians traversing the wider residential estate which envelopes the site. The proposed boundary treatments will create a passive and friendly setting. The internal footpaths and cycle paths will make the development permeable to all residents and visitors alike.

# (iv) Variety: - How does the development promote a good mix of activities?

The range of uses available within the development is limited by the residential zoning of the site. However, the proposed development features a creche facility which will enhance the number of daily interactions between residents.

(v) Efficiency - How does the development make appropriate use of resources, including land?

The concept of efficiency and sustainable development are key components of the design approach adopted. The proposal provides for moderate density residential development (36 units per hectare (net), taking into account accessibility to Dogheda town centre and the need to protect adjoining residential amenity as well as adjacent areas of sensitivity. The development has been laid out to exploit the best solar orientation thus minimising energy use.

(v) Distinctiveness - How do the proposals create a sense of place?

The proposed development effectively forms a new neighbourhood characterised by new dwelling typologies, landscaping elements, and external treatments, but at the same time it is considered not to represent an undue departure from the form of residential development on the existing housing schemes to the immediate east of the site.

The extent of public open space provided both within the extent of land zoned for residential development and the landscaped park being delivered to the north of the site will result in the creation of a residential development with immediate access to a variety of outdoor areas thus providing a unique sense of place.

(vii) Layout - How does the proposal create people friendly streets and spaces?

A hierarchy of streets, variety of surface treatments and landscaped areas/parks have been used to create people friendly streets and spaces within the development. Efforts have been made to ensure that the roads are not dominated by vehicle users but rather are safely shared by cyclists, pedestrians and drivers.

(viii) Public Realm - How safe, secure and enjoyable are the public areas?

The scheme has been designed with ample areas of public open space, play areas and landscaped areas being provided throughout the development. These public open space areas are located in close proximity to the proposed units and have windows fronting onto them providing passive surveillance and ensuring the safety/security/enjoyment of users of these spaces.

(ix) Adaptability - How will the buildings cope with change?

All dwellings are energy-efficient and equipped for challenges anticipated from a changing climate.

(x) Privacy and Amenity - How does the scheme provide a decent standard of amenity?

All houses in the proposed development will have direct access to an area of useable private garden accessible from ground floor level which greatly exceeds development plan standards. All apartment and duplex units units are provided with individual balconies and terraces which exceed development plan standards. All dwellings have access to areas of public open space provided through the site and are designed to prevent sound transmission by appropriate acoustic insulation.

(xi) Parking - How will the parking be secure and attractive?

The proposal includes a total of 396 no. car parking spaces which are provided throughout the proposed development comprising 388 no. spaces for the residential units, with 8 no. parking spaces provided for the creche facility. Residential parking spaces are provided either withing the curtilage or immediately adjoining the individual units whilst the commercial parking spaces are proximate to the creche building.

(xii) Detailed Design - How well thought through is the building and landscape design?

The materials and external design of the proposed development make a positive contribution to the locality. Design of the buildings will facilitate easy and regular maintenance. Care has been taken over the siting of flues, vents, bin storage, etc. Extensive work and consideration have gone into the landscape

design for the proposed development. Please refer to the Landscape Design Statement, as prepared by Cunnane Stratton Reynolds, for further information.

# 6.9 Design Manual for Urban Roads and Streets (2013)

The proposed development has been designed having regard to the Design Manual for Urban Roads and Streets (2013). The Manual includes guidance and standards for constructing new and reconfigured existing urban roads and streets, whilst also setting out practical design measures to encourage more sustainable travel patterns in urban areas. The internal road network has been designed to deliver security to future pedestrians and cyclists. The movement function of each of the internal local streets has sought to respect the different levels of motorised traffic whilst catering for a higher number of pedestrians and cyclists. The layout of the roads enhances pedestrian safety by slowing traffic and making the car subservient to the pedestrian and cyclist. A DMURS Compliance Statement has been prepared by Waterman Moylan Consulting Engineers, in support of this application This statement confirms that the proposal complies with the requirements of DMURS.

## 6.10 Smarter Travel: A Sustainable Transport Future - A New Transport Policy for Ireland (2009)

The purpose of the Smart Travel policy is to provide alternatives to the use of the car through improved public transport services and investment in cycling and walkable routes. The policy document states that:

'to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility.'

The 5 key goals of this transport policy are as follows:

- Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport;
- Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks;
- Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions;
- Reduce overall travel demand and commuting distances travelled by the private car; and,
- Improve security of energy supply by reducing dependency on imported fossil fuels.

The proposed development complies with Smarter Travel: A Sustainable Transport Future. The subject site is located within 2.5 kilometres of the Drogheda town centre. In terms of current transport options, the site is directly serviced by Bus Route No. 173, which serves wider Drogheda and is within 3.6km of Drogheda Station which serves Dublin City Centre.

# 6.11 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025)

The Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities, were published by the Department of the Environment, Community and Local Government in July 2025.

The 2025 Guidelines update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 apartment guidelines. It is noted that the Planning Authority will assess the subject application having regard to these Guidelines as per the following commentary from subsections 1.1 of said guidelines:

'The Planning Design Standards for Apartments Guidelines for Planning Authorities "the Guidelines" constitute Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended) ("the Act"). Planning authorities and An Coimisiún Pleanála are required to have regard to the Guidelines and are also required to comply

with any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions under the Act.

Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting policies and objectives of statutory plans1. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these Guidelines.'

Based on the foregoing, we will now proceed with an assessment against each of the applicable standards as provided below and overleaf:

#### Housing Mix

The following guidance is provided in relation to housing mix:

#### SPPR 1

- (A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.
- (B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.'

The proposed development provides for 249 no. residential units overall whilst comprising 79 no. apartment units subject to a mix of 38 no. one-bedroom and 41 no. two-bedroom units. Taking the apartment units either in isolation or in the context of the wider residential unit mix, the mix is considered to be appropriate within the context of the above Specific Planning Policy Requirement.

## Floor to Ceiling Height

The Guidelines require minimum floor to ceiling heights of 2.4m for apartments above ground floor, and 2.7m at ground floor to allow flexibility for future use. Floor to ceiling heights in the proposal comply with the Guidelines in both respects.

# Security Considerations

Section 3.9 of the Guidelines recommend that to ensure visitor and occupant safety natural surveillance should be maximised for all streets, open spaces, play areas and any surface bicycle or car parking areas. Particular attention should be given to entrance points being well lit and overlooked in building blocks. Consideration should also be given to incorporating privacy strips in instances where ground floor apartments front onto public footpaths. The proposal has been designed in a manner that allows for maximum natural surveillance throughout the development site, with windows overlooking all internal and external public spaces, whilst also providing terraces to apartments at ground floor level that, in some cases, front onto public footpaths and is therefore consistent with the Guidelines in this regard.

## Bicycle Parking

The Guidelines seek that the design of apartment schemes should ensure that bicycle parking spaces are located to be conveniently accessible to residents, both in terms of proximity to access points to apartments and routes to the external road / street network. We shall now provide a direct response to the following commentary from Section 4.5 of the Apartment Guidelines (2025) as is considered appropriate in the context of bicycle parking:

An important context for these Guidelines is a likely significant population increase in our cities and urban areas and the need to optimise the number of trips undertaken by bicycle. As noted in the Design Manual for Urban Roads and Streets (DMURS), trips by bicycle have the potential to replace motor vehicles as an alternative means of transport for short to medium range trips. As noted in the Sustainable Mobility Policy (SMP), electric bikes have an increasing share of the market and have the potential to extend the reach of active travel trips.

Requirements for the quantity and design of bicycle parking are set out in Section 5.25 (including SPPR 4) of the SRDCSGs.

We confirm that the subject development provides an appropriate quantum of bicycle parking for each residential apartment location at a location convenient relative to the apartment block or duplex building as applicable. Moreover, we note that compliance with regards to the quantity and design of bicycle parking, per the provisions of the Compact Settlements Guidelines, is demonstrated in Section 6.10.11 of this report.

Further, we confirm the following points in relation to bicycle parking:

## **Location**

All cycle parking facilities are easily accessible via the shared road network which, in turn, is easily accessible via Rathmullan Road. The routes from the public realm to the parking areas are short, unimpeded, and unhindered by level changes.

## Quantity

With a total of 79 no. apartment units and a unit mix of 38 no. one-bedroom and 41 no. two-bedroom apartments, the development requires a minimum of 110 no. resident bicycle parking spaces with an additional 40 visitor parking spaces.

The development includes bicycle stores to the rear of each apartment block and proximate to the duplex buildings which provide sufficient resident bicycle parking with additional visitor bicycle parking provided at surface level. The quantum of bicycle parking spaces provided as part of the proposed development is consistent with the requirements of the 2025 Apartment Guidelines.

## Design

The subject development provides all resident and visitor bicycle parking spaces at ground level within the boundary of the subject site. Resident parking is provided within a variety of secure stores whilst visitor parking is provided in open-air stands. Whilst individual cycle lockers are not provided, it is considered that the suburban location of the site and the level of passive surveillance achieved on site provides sufficient justification for the non-provision of such facilities.

#### Management

We confirm that the extent of bicycle parking spaces provided represents a significant quantum of such facilities. Moreover, noting that all spaces are provided at ground level, the spaces are highly accessible for ease of use by future residents.

## Car-Parking

Section 4.6 of the above guidelines states that car parking ratios for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria. The Apartment Guidelines notably defer to the provisions of SPPR 3 of the Compact Settlement Guidelines 2024 for the application of maximum car parking rates and we note that compliance with these guidelines, in respect of ca parking, is detailed in Section 6.4 of this report.

## **Dual Aspect Ratios**

The following guidance is provided in relation to housing mix:

## SPPR 3

- (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.
- (ii) 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 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.'

Subsection ii, above, is not applicable in relation to the subject proposal. In relation to subsection ii, the proposed development is located within a suburban location and notably provides 100% dual aspect apartments which complies with and substantially exceeds the above requirements.

Further to the above, the proposed apartment scheme will provide a high standard of accommodation for future residents who will be served by apartments designed in compliance with all relevant standards of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025), as will now be discussed below.

## Minimum Overall Apartment Floor Area

The proposed development fully accords with the required overall apartment floor area sizes outlined in the Guidelines as seen below.

Minimum Overall Apartment Floor Area			
Unit Type Minimum Floor Area Required Floor Areas Proposed			
One Bedroom	45sq.m	45.2-61.8sq.m	
Two Bedroom (4P)	73sq.m	83.3-114.1sq.m	

Figure 54.0 Table showing the minimum aggregate floor areas for living/dining/kitchen areas

## Storage Space

The proposed development is fully compliant with the minimum standards for storage space to serve each individual unit, as shown below.

Minimum Floor Area – Storage Space			
Unit Type	Requirement	Floor Area Proposed	
One Bedroom	3sq.m	3-5sq.m	
Two Bedroom (4P)	6sq.m	6.1-10.8sq.m	

Figure 55.0 Table showing the provided storage amenity space per apartment type.

# Private Amenity Space

The proposed development is fully compliant with the minimum standards for private amenity space to serve each individual unit, as shown, below.

Minimum Floor Area – Private Amenity Space		
Unit Type Requirement Floor Area Proposed		
One Bedroom	5sq.m	5-6.7sq.m
Two Bedroom (4P)	7sq.m	7-14.6sq.m

Figure 56.0 Table showing the provided private amenity space per apartment type.

## Communal Amenity Space

The proposed development is fully compliant with the minimum standards for communal amenity space to serve all units, as shown below.

Minimum Floor Area – Communal Amenity Space			
Unit Type	Requirement	Communal Amenity Space Required / Proposed	
One Bedroom	5sq.m (38 no. units) = 190sq.m	477sq.m required	
Two Bedroom (4P)	7sq.m (41 no. units) = 287sq.m	/ 1,576sq.m proposed	

Figure 57.0 Table identifying required quantum of communal amenity space for the apartment units.

It is submitted that the proposed development is wholly compliant with all the required floor area and room standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities. Please refer to submitted floor plans and relevant technical drawings submitted by NDBA Architects.

## 6.10 Meath County Development Plan 2021-2027

The Meath County Development Plan 2021-2027, as consolidated following Variation Nos. 1-3, is the relevant statutory planning document guiding development at the subject site.

## 6.10.1 **Zoning**

According to the zoning objectives contained within the Meath County Development Plan 2021-2027 the proposed development site is subject to two zoning objectives. Most of the site is zoned 'A2', the objective of which is to:

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

The remainder of the site (northern section adjacent to the Boyne Valley and part of the eastern section) is subject to 'F1' zoning, the objective of which is to:

'Provide for and improve open spaces for active and passive recreational amenities'.

The zoning matrix included in the Development Plan indicates 'permissible uses' and 'open for consideration uses' uses in 'A2' and 'F1' zones.

Permissible uses are generally acceptable subject to the normal planning process and compliance with the relevant policies and objectives, standards and requirements set out in the Plan. An open for consideration use is one which may be permitted where the planning authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects on the permitted uses, and would otherwise be consistent with the proper planning and sustainable development of the area. The following uses are 'permissible' and 'open for consideration' in the 'A2' and 'F1' zones:

## A2 Zoning: Permissible Uses

**Residential** / Sheltered Housing, B & B / Guest House, Bring Banks, Community Facility / Centre, **Childcare Facility**, Convenience Outlet, Children Play / Adventure Centre, Education (Primary or Second Level), Halting Site / Group Housing, Home Based Economic Activities, Leisure / Recreation / Sports Facilities, Retirement Home / Residential Institution / Retirement Village, Utilities.

## F1 Zoning: Permissible Uses

Car Park for Recreational Purposes, Craft Centre / Craft Shop, Community Facility / Centre, Cultural Facility, Cycleways / Greenways / Trail Development, Leisure / Recreation / Sports Facilities, Playing Pitches, Playgrounds, Utilities.

It is submitted that the proposed residential development and creche are acceptable uses with regards to the zoning applying in the subject site. The proposed dwellings and apartments have been offset from the portion of the subject site zoned 'F1', with the 'F1' zoned land being used for landscaped public open space.

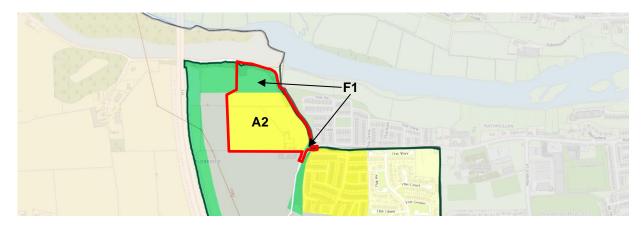


Figure 58.0 Extract from Meath County Development Plan 2021-2027 Land Use Zoning Objectives Map, with the development site (red outline) zoned A2 – New Residential and F1 – Open Space.

# 6.10.2 Core Strategy

Set out in Chapter 2 of the Meath County Development Plan 2021-2027 is the 'Core Strategy' which outlines the medium to long term strategy for the spatial development for the county by way of policies and objectives, translating the strategic planning framework set out at national and regional levels. Section 2.9.5 of Chapter 2 notes that the total projected household requirement for the County between 2016-2027 is 20,671 residential units. This number is identified as the total household allocation in section 2.10.4, where it is noted that approximately 3,713 units were constructed between 2016-2019, leaving an allocation of 16,958 units to be built across the wider County during the remainder of the Plan period 2020-2026.

The Vision of the Core Strategy is to:

'Continue to support the creation of socio-economically progressive vibrant, dynamic, and healthy communities throughout the County and ensure that future growth is based on the principles of sustainable development that delivers a high-quality living and working environment that meets the needs of all residents, in accordance with National and Regional Guidance.'

Moreover, the following Core Strategy Policies and Objectives are noted:

- **CS POL 1** To promote and facilitate the development of sustainable communities in the County by managing the level of growth in each settlement to ensure future growth is in accordance with the Core Strategy and County Settlement Hierarchy in order to deliver compact urban areas and sustainable rural communities.
- **CS OBJ 1** To secure the implementation of the Core Strategy and Settlement Strategy, in so far as practicable, by directing growth towards designated settlements, subject to the availability of infrastructure and services.
- **CS OBJ 2** To ensure that sufficient zoned lands are available to satisfy the housing requirements of the County in designated settlements over the lifetime of the Plan.
- CS OBJ 3 To ensure the implementation of the population and housing growth household allocation set out in the Core Strategy and Settlement Strategy, in so far as practicable. Meath County Council will monitor the number of units that are permitted and under construction/built as part of the implementation of this objective.

- **CS OBJ 5** To deliver at least 30% of all new homes in urban areas within the existing built-up footprint of settlements.
- CS OBJ 8

  The existing Southern Environs of Drogheda Local Area Plan 2009 (The LAP) shall remain the statutory plan for the Southern Environs of Drogheda until such a time as it is replaced with a Joint Urban Plan for Drogheda in conjunction with Louth County Council having regard to the requirements of the Report of the Drogheda Boundary Review Committee (February 2017), the National Planning Framework, and the Eastern and Midland Region Regional Spatial and Economic Strategy. This plan shall be read together with the County Development Plan 2020-2026. The County Development Plan 2020-2026 shall take precedence if a conflict arises between the Plans and the conflicting provision of the LAP shall cease to have effect.
- **CS OBJ 12** To ensure that all settlements, in as far as practicable, develop in a self-sufficient manner with population growth occurring in tandem with the provision of physical and social infrastructure.
- **CS OBJ 18** To incorporate the relevant housing needs for 2027 into the Housing Strategy over the lifetime of the Development Plan.

As noted in the County Development Plan, the settlement of Drogheda is included within the core area of Meath County. The plan states that:

'Future growth in the Core Area is to be focused on consolidated, compact growth in key employment and service centres.'

The Core Strategy notes that 'outside of the Metropolitan Area, future growth will be directed towards key designated settlements including the Regional Growth centre of **Drogheda** and the Key Town of Navan.' More specifically, the County Development makes specific reference to the application lands:

'However, the Council also recognises that Drogheda is one of the principle areas for population and economic growth in the Eastern and Midland Region outside Dublin..... Taking this into account it is important that land use availability is reflective of its position in the settlement hierarchy and its anticipated role in the future growth and development of the Region, which is to act as a regional driver of economic growth. The 'Residential Phase II' designation on the A2 'New Residential' lands in the Southern Environs of Drogheda has, therefore, been removed with these A2 'New Residential' lands retained and being made available for development.'

The purpose of the above amendment is to ensure that there is sufficient land available to facilitate the anticipated population growth of Drogheda. In this regard, we would first note that, as per the below table, Drogheda was allocated a total of 1,631 residential units over the plan period.

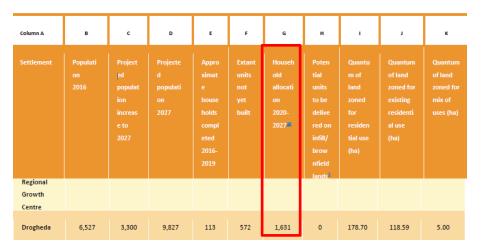


Figure 59.0 Extract of Core Strategy Table (2.12) of the Meath County Development Plan 2021-2027 showing Drogheda household allocation to 2027.

For the purposes of this planning application, a detailed review of all planning applications within the area of Drogheda which are within the jurisdiction of Meath County Council has been undertaken. Further to this, we would note that detailed review of all planning applications specifically within the southern environs of Drogheda, which are within the jurisdiction of Louth County Council has been undertaken.

The review of planning applications within Meath has identified 662 no. residential units which have been permitted by Meath County Council in Drogheda. We note that an additional 95 no. residential units have been permitted by Meath County Council but are currently under appeal before An Coimisiún Pleanála. Should the yet to be decided appeal pertaining to the 95 no. residential units be granted, the number of units permitted within Drogheda over the 2020-2027 period will still remain less than half of the allocated quantum identified in the above table (Figure 59.0).

Meath County Council Planning Applications for Residential Development in Drogheda in Preceding 5 no. Years.			
Reg. Ref. No.	Number of Units	Currently on Appeal	
211029	1	N/A	
211290	1	N/A	
211448	96	N/A	
211669	96	N/A	
211757	26	N/A	
211804	1	N/A	
212412	95	<u>Yes</u>	
21663	1	N/A	
221365	76	N/A	
22274	1	N/A	
22604	1	N/A	
23224	1	N/A	
2337	1	N/A	
23423	24	N/A	
23442	1	N/A	
2353	1	N/A	
2360071	1	N/A	
2360196	1	N/A	
2360285	1	N/A	
2360314	1	N/A	
2367	1	N/A	
2460434	1	N/A	
2460674	1	N/A	
2460832	36	N/A	
LB201937	90	N/A	
SH311028	201	N/A	
Totals	662	95	

Figure 60.0 Table illustrating number of permitted residential units within Drogheda, within the jurisdiction of Meath County Council over a five-year period preceding the current application.

Further to the above, we would note that the area of Drogheda within the jurisdiction of Louth County Council was allocated a total of 2,447 residential units over the period of the Louth County Development Plan 2021-2027.

Effectively, the subject application will not result in the core allocation being exceeded but will assist the Planning Authority in reaching the target by the end of the Meath County Development Plan period. It is submitted that the proposed development is therefore in accordance with the objectives of the 'Core Strategy' as set out in the Meath County Development Plan 2021-2027.

Column	Column	Column	Column	Column	Column	Column	Column	Column	Column
Settlement Category	B Settlement	Population 2016	Projected Population Increase to 2027	Projected Population 2027	Housing Allocation 2021-2027	G Lands with potential to deliver Infill or Brownfield Development (ha)	Potential units to be delivered on Infill/ Brownfield Lands	Total Lands Zoned New Residential Phase 1 (ha)	Total lands zoned New Residential (Phase 1 and Phase 2) (ha)
County	Louth	128,884	21,082	149,966	6,524	110.4	4,302	506.1	597.1
Regional	Drogheda	34,199	6,914	41,113	2,447	34.8	1,725	270	270
Growth Centre	Dundalk	39,004	7,660	46,664	2,447	30	1,743	150.3	225.7

Figure 61.0 Extract of Core Strategy Table (2.15) of the Louth County Development Plan 2021-2027 showing Drogheda household allocation to 2027.

# 6.10.3 Settlement Hierarchy

Chapter 3 of the Meath County Development Plan 2021-2027 refers to the settlement hierarchy contained within the RSES and notes that this settlement hierarchy identifies the Regional Growth Centres and Key Towns. The position of the remaining settlements in this hierarchy is to be established in the Development Plan process. It is noted that the South Drogheda Environs area which includes the application site is noted as a Regional Growth Centre which has the following description:

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

The Development Plan further notes that the primary focus of growth in this Settlement Strategy will be towards the Metropolitan Settlements (Dunboyne and Maynooth Environs), **the Regional Growth Centre (Southern Environs of Drogheda**), and the Key Town of Navan. The concentration of development in these locations will strengthen the urban structure of the County and support the creation of a critical mass of population in key locations which will assist in creating economies of scale for businesses, investors and infrastructure service providers whilst also providing opportunities to improve the level of community facilities available.

The plan continues to note that Drogheda has been identified as 1 of 3 Regional Growth Centres in the Eastern and Midland Region in the NPF. It is a settlement with significant growth potential due to its location along the Dublin-Belfast Economic Corridor, the existing service and employment provision in the town, and its capacity to accommodate further growth. The RSES sets out a strategic framework for Drogheda that will support the continued development of the town and allow it to function as a driver for regional growth. This growth strategy includes a population target of 50,000 for the town by 2031. The subject site is located within the Electoral Division (ED) of Saint Mary's, Meath which had a population of 16,403 persons in 2022.

The following policies from the Development Plan are noted:

- **SH POL 1** To ensure that all settlements, in as far as practicable, develop in a self-sufficient manner with population growth occurring in tandem with the provision of physical and social infrastructure.
- **SH POL 2** To promote the consolidation of existing settlements and the creation of compact urban forms through the utilisation of infill and brownfield lands in preference to edge of centre locations.
- SH POL 3 To support the creation of healthy and sustainable communities that encourages and facilitates walking and cycling and general physical activity through the implementation of best practices in urban design that promotes permeability/interconnecting spaces.

It is considered that the proposed scheme is reflective of a self-sufficient residential development both on the basis of its position adjacent to existing residential estates and public transport services and the fact that it is being delivered alongside a large landscaped public park which will contribute greatly towards the general residential amenity of the immediate and wider area. This Park will support the creation of healthy and sustainable communities and will encourage and facilitate walking, cycling and general physical activity.

Whilst SH POL 2 illustrates a preference for the use of infill/brownfield lands in preference to edge of centre locations, we would again note the below extract of the Core Strategy Table (2.12) of the Meath County Development Plan which confirms that the Planning Authority do not expect the delivery of any residential units on infill/brownfield within Drogheda over the course of the plan period.

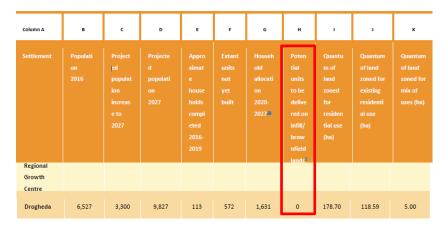


Figure 62.0 Extract of Core Strategy Table (2.12) of the Meath County Development Plan 2021-2027 showing Drogheda allocation to 2027.

## 6.10.4 Residential Development

The Meath County Development Plan 2021-2027 requires a high standard of residential development, which provides good quality accommodation and also protects the character and amenity of the area. This is embedded in the zoning objective of the lands, which seeks to protect and enhance the amenity of developed residential communities, and is also pursuant to the following development plan policies:

- SH POL 7 To encourage and foster the creation of attractive, mixed use, sustainable communities that include a suitable mix of housing types and tenures with supporting facilities, amenities, and services that meet the needs of the entire community and accord with the principles of universal design, in so far as practicable.
- SH POL 8

  To support the creation of attractive residential developments with a range of housing options and appropriate provision of functional public and private open space that is consistent with the standards and principles set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the associated Urban Design Manual A Best Practice Guide, DEHLG (2009) and any subsequent Guidelines to require a high standard of design in all new residential schemes that are built in a style and scale that is appropriate to the landscape setting.
- SH POL 10 To require that applications for residential development take an integrated and balanced approach to movement, place making, and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTS and DECLG (2013 and updated in 2019).
- SH POL 11 To encourage improvements in the environmental performance of buildings by promoting energy efficiency and energy conservation in existing and new developments in line with best practice.
- **SH POL 12** To promote innovation in architectural design that delivers buildings of a high-quality that positively contributes to the built environment and local streetscape.
- SH POL 13 To require that all new residential developments shall be in accordance with the standards set out in the Development Management Standards and Land Use Zoning Objectives set out in Chapter 11 of this Plan, in so far as is practicable.

The proposed development is compliant with each of the above policies. These policies are further supplemented by the following objectives:

## SH OBJ 22

To require that, where relevant, all new residential developments shall be in accordance with SSPR 1 to SPPR 4 of the Urban Development and Building Heights Guidelines for Planning Authorities, December 2018 as well as SPPR 1 to SPPR 9 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2018. All new residential development should comply with the densities outlined in Chapter 11 of this plan.

#### SH OBJ 23

To seek that all new residential developments on zoned lands in excess of 20 residential units provide for a minimum of 5% universally designed units in accordance with the requirements of the 'Building for Everyone: A Universal Design' developed by the Centre for Excellence in Universal Design (National Disability Authority).

## SH OBJ 24

To require that all new residential development applications of 50 units or more are accompanied by a Social Infrastructure Assessment (SIA) to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents in accordance with the requirements of policy SOC POL 6 in the 'Community Building Strategy' (Chapter 7).

Compliance with the SPPRs of the Urban Development and Building Heights Guidelines for Planning Authorities and the relevant SPPRs of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities is demonstrated in Sections 6.3.1 and 6.11 of this Report.

It is further noted that the proposed development has been designed in accordance with SH OBJ 23 and includes a Social Infrastructure Assessment as guided by SH OBJ 24. Chapter 11 of the Development Plan sets out the development management guidelines and standards which seek to supplement the policies and objectives cited throughout the development plan. These guidelines deal with qualitative and quantitative standards, with those relevant to the proposal for the subject site being as presented in the following sections of this report.

#### 6.10.5 Unit Mix

Section 11.5.8 'Dwelling Design, Size & Mix' of the County development plan has regard to unit mix standards, accordingly we note the following commentary from this section:

## DM POL 6

To require that the unit typologies proposed provide a sufficient unit mix which addresses wider demographic and household formation trends. The design statement required at DM OBJ 13 shall set out how the proposed scheme is compliant with same.

As stated previously all dwellings and apartment units within the proposed development are generously sized and thoughtfully laid out, providing high standards of residential amenity and exceeding the minimum size standards. The unit typology mix of the application is set out below:

Dwelling Type	No. Proposed
1 Bedroom Apartment (Apartment Block)	22
1 Bedroom Apartment (Duplex Building)	16
2 Bedroom Apartment (Duplex Building)	16
2 Bedroom Apartment (Apartment Block)	25
2 Bedroom Mid-Terrace House	23
2 Bedroom Semi-Detached House	14
3 Bedroom Mid-Terrace House	38
3 Bedroom Semi-Detached House	73
4 Bedroom Semi-Detached House	22
Total	249

Figure 63.0 Table showing mix of dwelling types proposed.

As presented above, there is significant variety within the proposed development with regards to the type of residential unit within which a future resident may reside. This variety has been utilised effectively to provide character areas within the scheme and to prevent the monotony which arises through overuse of one predominant unit type.

Unit Type (No. of Bedrooms)	No. Proposed	% of Total
1 Bedroom	38	15.2%
2 Bedroom	78	31.3%
3 Bedroom	111	44.6%
4 Bedroom	22	8.9%
Total	249	100%

Figure 64.0 Table showing mix of unit sizes (by bedroom) proposed.

As presented above, the unit mix for the proposed scheme is appropriately balanced with no tenure typology exceeding half of the total units. The scheme provides sufficient variety to accommodateyoung couples, growing/large families and downsizing individuals,. The provision of one-bedroom units is considered to be appropriate, given the limited provision of such residential stock within the area. The quantum of one, two, three and four bedroom units are similarly considered appropriate in the context of the true housing demand which exists for such unit types in the immediate and wider area.

## 6.10.6 Density

The Meath County Development Plan does not provide a definitive figure with regards to the appropriate density of individual sites regardless of zoning designation. In this respect, the following commentary from Section 11.5.3 'Density' of the Development Plan is noted:

'In general, the number of units to be provided on a site should be determined with reference to the Guidelines for Planning Authorities on 'Sustainable Residential Development in Urban Areas' (2009) or any update thereof.'

Applying the above requirement, the provisions of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) apply (as presented in Section 6.4 of this report), and which guide a range of 35-50 units per hectare due to the sites status as a 'Regional Growth Centre - Suburban/Urban Extension' (ref. Table 3.8).

The proposed development makes provision for 249 no. residential units. A considerable section of the development site is situated within lands subject to the F1 zoning objective. This body of land, given its proximity to both the motorway and River Boyne is unsuitable for development and has been designated as open space to serve the development. It is submitted that excluding this body of land, which is subject to the F1 zoning parameters, the zone of public open space adjoining the Rathmullan Road, the main arterial roads through the development and the area taken up by the Rathmullan Road realignment/upgrade works that the resultant net site area, as considered appropriate for density calculation, is 6.92 hectares.

This site area in conjunction with the proposed 249 no. units provides a residential density of 36 units per hectare and thus complies with both the County Development Plan and the Sustainable Residential Guidelines 2024. Furthermore, the undulating topography of the subject site dictates the layout of development on the subject site as well as where access can be provided. These parameters operate to constrain the scope for development across the site and in the circumstances, the proposed development achieves an appropriate and realistic density which best utilises the opportunity for development whilst meeting the development control criteria as provided in the Compact Settlement Guidelines 2024.

# 6.10.7 Building Height

Section 11.5.9 discusses the building heights and specifically refers to the requirement for Planning Authorities, as set out within The Urban Development and Building Height Guidelines (2018), to identify and provide policy support for specific geographic locations where increased building height is a fundamental policy requirement. In this regard in accordance with SPPR1 of the Guidelines, the Meath County Development Plan 2021-2027 identifies the following locations as suitable to accommodate increased building height in the County:

- Dunboyne at both Dunboyne Central and Pace rail stations,
- Maynooth Environs,
- Drogheda Environs,
- Navan

We confirm that the proposal is fully compliant with the Meath County Development Plan with regards to height of the buildings proposed. It is submitted, noting site orientation and separation distances from existing/future development, that the heights of the apartment blocks contained within this development is inconsequential in the overall design concept with the use of apartment blocks adding visual interest to the development in conjunction with the practicality of allowing for a higher density of development.

The height strategy adopted has had regard to surrounding sensitivities including the open space zoning lands to the north and is considered to be at an appropriate scale for its context.

## Private Open Space

The Meath County Development Plan 2021-2027 provides the following standards with regards to the provision of private amenity space to serve housing units:

House Type	Minimum Area of Private Open Space to be Provided
Two bedrooms	55 sq.m
Three bedrooms	60 sq.m
Four/or more bedrooms	75 sq.m

Figure 65.0 Summary of Table 11.1: Minimum Private Open Space Standards for Houses as per Meath County Development Plan 2021-2027.

Notwithstanding the provisions of the Meath Development Plan 2021-2027, we note the following extract from SPPR No. 2 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024):

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

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

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

Each residential house has been designed to provide private amenity space in excess of the requisite standards guided by the above SPPR whilst all apartment units within the scheme provide amenity space in accordance with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities.

## 6.10.8 Public Open Space

Section 11.5.11 sets out Open Space Requirements for residential developments.

#### DM OBJ 26

Public open space shall be provided for residential development at a minimum rate of 15% of total site area. In all cases lands zoned F1 Open Space, G1 Community Infrastructure and H1 High Amenity cannot be included as part of the 15%. Each residential development proposal shall be accompanied by a statement setting out how the scheme complies with this requirement.

Further to the above objective, the Meath County Development Plan provides the following commentary in relation to the design of public open space:

'Public open space within residential developments should be designed to complement the residential layout and be informally supervised by residents. A variety of types and sizes of open spaces should be provided at suitable locations to cater for the active and passive recreational needs of children and adults of all ages'. The proposed development provides an appropriate design response, with regards to the design of public open space, to the orientation of the site which will provide for a high standard of visual amenity and usable spaces. Excluding the F1 zoned lands, the proposal provides 1.17 hectares (16.9% of residentially zoned lands) of public open space within the net development area. The public gain arising from the provision of open space to the north should be taken into consideration in addition to the 16.9% provided within the A2-zoned lands. The landscaped areas along the River Boyne will be enjoyed by residents of and visitors to Drogheda. The total provision of 2.85 hectares (30.98% of the red line boundary area) i.e. the area of development plus the adjoining amenity-zoned areas, is, we submit, a significant planning gain for the public benefit.

The provision of public open space is compliant with the relevant requirement of the Meath Development Plan 2021-2027, it is considered appropriate relative to the provisions of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) as referenced in Section 5.4 of this report. We refer the Planning Authority to the enclosed suite of landscaping documentation, as prepared by Cunnane Stratton Reynolds, for further information with regards to the landscaping of the various public open spaces provided as a result of this application.

## 6.10.8 Separation Distances

The Development Plan states that a minimum of 22 metres, between directly opposing windows shall be observed in order to prevent overlooking and protect the residential amenity of each dwelling. Notwithstanding this, we note the following extract from SPPR No. 1 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024):

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

The proposal has been designed to comply with the reduction in requisite separation distances between opposing windows serving habitable rooms above ground floor level, to a minimum of 16 metres, which is afforded under the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

## 6.10.9 Childcare Facilities

Sections 7.7.3.3 'Childcare Facilities' and 11.7.3 'Childcare' of the Meath County Development Plan guide the management of childcare facilities within the local authority administrative area. Meath County Council is committed to developing a society based on equality, inclusion and participation for all, with each individual having a right to live their life in a pleasant, safe environment with access to necessary services and facilities to fulfil their aspirations and potentials. In this regard, the following policy is noted:

**DM POL 5**To facilitate the provision of childcare facilities in appropriate locations as set out in accordance with the provisions of the DoEHLG 'Childcare Facilities Guidelines for Planning Authorities' (2001).

Meath County Council require the provision of childcare facilities of an appropriate type and scale in suitable locations throughout the County. In particular, the development of childcare facilities at the following locations will normally be required:

- Areas of concentrated employment and business parks;
- Within new and existing residential developments;
- Neighbourhood Centres;
- Large retail developments;

- Schools or major educational facilities;
- Adjacent to public transportation; and
- Villages and Rural Nodes

The Development Plan outlines the following factors which may be considered in the determination of a planning application for a childcare facility:

## **DM OBJ 68**

Planning applications for childcare facilities shall be assessed for compliance with the following criteria:

- Suitability of the site for the type and size of facility proposed.
- Impact on residential amenity of surrounding residential development;
- Adequate availability of indoor and outdoor play space;
- Convenience to public transport nodes, pedestrian and cycling facilities;
- Local traffic conditions:
- Safe access and sufficient convenient off-street car parking and/or suitable drop-off and collection points for customers and staff; and
- Number of such facilities in the area. In this regard, the applicant shall submit a map showing the locations of childcare facilities within the vicinity of the subject site and demonstrate the need for an additional facility at that location.

Furthermore, the Meath County Development Plan 2021-2027 also recognises that childcare must be of suitably high quality.

The Council will seek to facilitate the provision of childcare facilities in appropriate locations throughout the County and may require their provision in large residential, public community, commercial and retail developments in accordance with the provisions of the *DoEHLG 'Childcare Facilities Guidelines for Planning Authorities'* (2001).

These guidelines identify appropriate locations for childcare facilities in Section 2.4 and provide the following guidance:

'Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments. For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate.'

The number of proposed dwellings (249) would trigger the need to have a stand-alone childcare facility within the development based on the Childcare Facilities Guidelines (2001).

The proposed childcare facility extends to 411sq.m and is considered sufficient to accommodate 58 no. children. It is considered that the proposed childcare facility has been designed to a high standard and is suitably positioned to ensure compliance with the standards and provisions of the Meath County Development Plan 2021-2027 and the Childcare Facilities Guidelines for Planning Authorities, June 2001.

## 6.10.11 Bicycle Parking

In addition, we note the Council will require an appropriate amount of cycle parking facilities to be provided with the proposed development.

**DM OBJ 96** To require the provision of cycle parking facilities in accordance with the Design Standards for New Apartments (March 2020) and Table 11.4 Cycle Parking Standards.

<b>Development Type</b>	Cycle Parking Standard
Apartments	1 no. space per bed space (resident) +1 no. space per two units (visitor
Other developments	1 no. space per car space, or 10% of employee numbers in general

Figure 66.0 Car parking standards as set by the Meath County Development Plan.

Notwithstanding the above, we note the following extract from SPPR No. 4 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024):

The following requirements for cycle parking and storage are recommended:

- (i) Quantity in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.
- (ii) Design cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.

Based on the above SPPR, wherein the proposed houses can accommodate bicycle parking within their private amenity space at ground level, bicycle parking has been provided for all apartments units within the scheme, at a ratio of 1 no. space per bedroom, with an extent of visitor parking also provided at ground level proximate to each apartment block.

## 6.10.12 Car Parking

Car parking standards provide a guide on the number of required off-street parking spaces acceptable for new developments. The purpose of parking standards is to ensure that a considered and appropriate level of parking is provided to serve new development. Section 11.9.1 'Parking Standards' of the County development plan has regard to car parking standards, according to this section the requirement for car parking is as follows:

Dwelling/Apartment/Building Type	No. of Car Parking Spaces Required
Dwellings	2 per Conventional Dwelling
Apartments	(Refer to the Design Standards for New Apartments)
Crèche	1 per employee & 1 per 4 children (drop-off)

Figure 67.0 Car parking standards as set by the Meath County Development Plan.

We would first note that the subject development provides 8 no. parking spaces for the creche facility thus providing a quantum of vehicular parking which is considered sufficient to serve this facility. We also note, per the above table, that the Meath County Development Plan defers to the Apartment Guidelines, for which we would note the 2025 Guidelines to be in effect. We would further note that the 2025 Apartment Guidelines defer, in turn, to the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) as to the appropriate quantum of vehicular parking for residential apartments. Accordingly, we note the following wording of SPPR No. 3 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) which requires that:

In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling. Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

SPPR No.3 permits a maximum parking provision of <u>2 no. spaces per dwelling. Accordingly, the proposed development can provide a maximum of 498 no. parking spaces for the residential element of the scheme. We would note that, ,generally, 2 no. parking spaces per house will be provided within the curtilage of the unit.</u>

There are however some narrow houses which will provide 1 no. parking space within curtilage with an additional space available off curtilage. Car parking for the apartments will be provided in close proximity to the various blocks and will be off curtilage in nearby bays. The scheme provides a total of 388 no. residential parking spaces, in addition to the 8 no. spaces dedicated for the creche facility, thus providing a ratio of over 1.5 parking spaces per dwelling.

The car parking provision for the proposal has been formulated by considering the suburban location of the subject site, which is served by an established public transport network. The subject site is located within a significant settlement, is well served by public transport (rail and bus services) and pedestrian and cyclist connectivity.

The development plan also includes policies and objectives to encourage the use of public transport and provides guidance to limit the proliferation of the private car and it is considered that the proposed development is consistent with these. The car parking provided does not dominate the layout of the development with any visual impact appropriately screened and softened using planting and landscape features to protect the public realm. Furthermore, we note that vehicular parking has been designed with in compliance with the below objective of the Development Plan.

## DM OBJ 94

All car parks shall include the provision of necessary wiring and ducting to be capable of accommodating future Electric Vehicle charging points, at a rate of 20% of total space numbers.

## 6.10.13 Plot Ratio & Site Coverage

Sections 11.5.4 and 11.5.5 of the Meath County Development Plan 2021-2027 relate to Plot Ratio and Site Coverage respectively. We would note and respond to the following objectives of the plan with regards to these standards for assessment:

#### DM OBJ 15

As a general rule, the indicative maximum plot ratio standard shall be 1.0 for housing at edge of town locations with an indicative maximum plot ratio of 2.0 in town centre/core locations.

The proposed development provides a plot ratio figure of 0.4 based on the area of land zoned for residential development (A2 zone – 6.92 hectares).

# DM OBJ 16

Site coverage shall generally not exceed 80%. Higher site coverage may be permissible in certain limited circumstances such as adjacent to public transport corridors; to facilitate areas identified for regeneration purposes; and areas where an appropriate mix of both residential and commercial uses is proposed.

The proposed development provides a site coverage figure of 20% based on the area of land zoned for residential development (A2 zone -6.92 hectares). As per the above figures, the proposed development is compliant with the plot ratio and site coverage figures guided by the Meath County Development Plan 2021-2027 for residential development.

# 6.10.14 Climate

Chapter 10 'Climate Change Strategy' of the Meath County Development Plan 2021-2027 outlines the approach to climate change adaptation and greenhouse gas mitigation, as required by the Planning and Development Act 2000, as amended, with the act highlighting the need to reduce the overall quantity of greenhouse gas emissions and to develop an adaptation strategy to manage anticipated future climate risks. The aforementioned chapter contains several policies and objectives relating to the mitigation of negative impacts which we note as follows:

#### INF POL 37

To seek to improve the energy efficiency of the County's existing building stock in line with good architectural conservation practice and to promote energy efficiency and conservation in the design and development of all new buildings in the County, in accordance with the Building Regulations Part L (Conservation of Fuel and Energy)

## INF POL 38

To encourage that new development proposals maximise energy efficiency through siting, layout, design and incorporate best practice in energy technologies, conservation and smart technology.

## INF POL 39

To encourage the attainment of high standards of energy efficiency and environmental sustainability in development and to support the development of sustainable buildings that achieve certification under the Home Performance Index.

The proposed development has been prepared with full cognisance for above policy guidance with the individual houses, duplex buildings, apartment blocks and creche all designed to maximise energy efficiency and reflect the principles of sustainable design.

We would note that the Climate Change Strategy of the Development Plan makes reference to the Climate Action Plan 2019, a plan which has since been superseded by the Climate Action Plan 2025. The CAP 2025 outlines Ireland's strategic framework for addressing climate change. Its focus and aim is to achieve net-zero carbon emissions by enhancing renewable energy adoption, improving energy efficiency, and transitioning to a low-carbon economy. The plan emphasises collaborative efforts across sectors, supported by robust policy measures, to drive sustainable development and innovation while ensuring equitable economic growth and resilience to climate impacts.

The Climate Action Plan 2025 places significant emphasis on the role of new developments in contributing to Ireland's climate goals. It acknowledges that the construction and operational phases of new developments can have substantial impacts on the environment and climate.

Therefore, the plan mandates that all new developments must integrate climate adaptation and mitigation strategies from the outset. Moreover, the plan calls for new developments to contribute to the broader goal of reducing emissions across all sectors. For example, in the built environment, new residential and commercial buildings must be designed to minimise their carbon footprint through energy efficiency measures and the use of sustainable materials.

The proposed residential scheme aligns with the aims and objectives of the Climate Action Plan 2025 by responding sensitively to the site's context to ensure sustainable development. Reflecting the Plan's focus on resilience and sustainability, the scheme promotes a compact residential layout with appropriate density, integrated transport options—including pedestrian and cycle routes—and high-quality green spaces. These green areas also incorporate SuDS and measures for rainwater attenuation and flood management. By supporting an appropriately scaled form of development within a suitably zoned location, the proposal upholds the principles of sustainability and resilience set out in the Framework, contributing meaningfully to Ireland's climate targets.

## 6.11 Planning Strategy for Greater Drogheda Area

The Planning Strategy for Greater Drogheda Area was published in 2007. It was jointly commissioned by Louth, Meath and Drogheda Borough Councils and had a 20-year timeframe. It sought to plan for the cohesive and integrated development of the town going forward. The Strategy provides a framework within which the future planning of the area will take place. It will inform the content and implementation of present and future statutory plans.

The Strategy presented a statement of objectives up to the year 2027 and recommended a process for the management of growth within the Study Area during that time. Map 6.1, included in Section 6.0 of the Strategy, illustrates an indicative roll out of residential development lands within the Drogheda area. The following is outlined in regard to Period 1:

'In the short term up to 2008, infrastructure (and associated permissions for development) to develop out the environs will likely be progressing through the planning system. In line with the principles of sustainable development it is appropriate to continue to support the established zoned landbank within the Core Area. The main locations of development would likely be around Scotch Hall, the quays, Duleek Road, Rathmullen Road Ballymakenny Road (in the vicinity of Castle Manor housing estate).'

Further to the above, the subject site falls within one of the 'core area residential growth areas' identified in Map 6.2. The proposed development is consistent with the direction provided in the above policy.

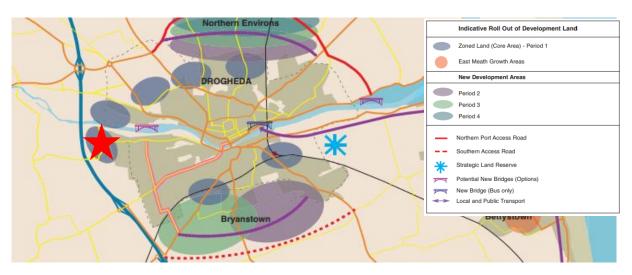


Figure 68.0 Map 6.1 indicating expected roll out of residential development lands (subject site marked with red star).

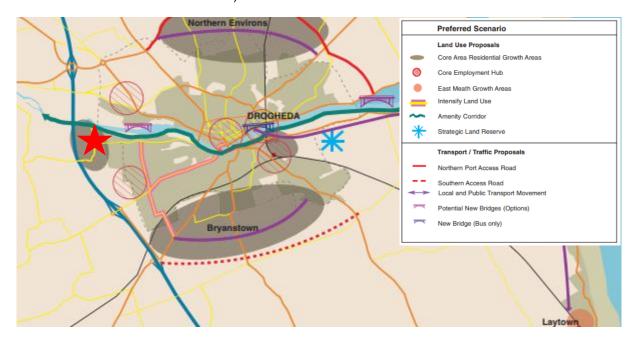


Figure 68.0 Map 6.2 - Preferred Scenario Map (subject site marked with red star).

As discussed above, the Meath County Development Plan 2021-2027 includes a Written Statement for the Southern Environs of Drogheda which provides a development management basis on the area until a Joint Urban Area Plan for the area has been completed by Meath and Louth County Councils.

# 6.12 South Drogheda Urban Area Plan (or Joint Urban Area Plan)

Volume 2 of the Meath County Development Plan 2021-2027 includes a written statement which provides a brief description and development strategy for the South Drogheda Environs.

As required by Regional Policy Objective 4.11 in the RSES1, a Joint Urban Area Plan (UAP) is to be prepared by Meath County Council and Louth County Council during the life of the County Development Plan 2021-2027.

Pending the completion of this Urban Area Plan, a written statement and land use zoning objectives map to establish a framework for inter alia the future UAP, to support economic development and to provide a basis for continued operation of the development management process pending the completion of the UAP has been included with the Meath County Development Plan 2021-2027.

'The Development Strategy for the area will focus on the creation of a sustainable settlement with improved links and connections to the town centre and where there is a balance between population growth and economic development.'

'This Plan will support the creation of sustainable communities in South Drogheda, with the development of residential lands being dependent on the provision of any necessary social and physical infrastructure.'

STH DRO POL 1 To support the continued development of Drogheda as an attractive, vibrant, and

accessible Regional Growth Centre that functions as a focal point for economic investment and population growth along the Dublin-Belfast Economic Corridor.

STH DRO OBJ 2

To support the sustainable development of existing zoned lands in the Southern Environs of Drogheda with a particular emphasis on the promotion of the IDA Business Park as a location for strategic economic investment and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs

The proposal will provide for a new residential community within the area, accommodating a significant number of families in a well serviced, growing location. The development will also provide for a childcare facility further enhancing the quality of living. It is contended that the proposal accords with the above.

# 7.0 Social and Affordable Housing

## 7.1 Part V, Section 96 of the Planning and Development Act

Part V, Section 96 of the Planning and Development Act 2000 (as amended), applies to applications for development in excess of 4 no. dwellings and development of dwellings on land of more than 0.1 hectare. Therefore, the proposed residential development would be required to comply with these provisions.

New provisions relating to Part V, under the Urban Regeneration and Housing Act 2015, were formally enacted on 1<sup>st</sup> September 2015. Since 31 August 2015, 2 guidance circulars have been issued by the Department and one Guideline under section 28 of the Planning and Development Act 2000:

'Circular Housing 33 of 2015 of 31 August 2015 - Urban Regeneration and Housing Act 2015 – amendments to the operation of Part V of the Planning and Development Act 2000.

Circular PL 10/2015 and Housing 36/2015 of 30 November 2015 - Part V - Implementation of Article 22(2)(e) of the Planning and Development Regulations 2001, as amended – Validation of Planning Applications.

Guidelines on Application of Part V of the Planning and Development Act 2000, after 1 September 2015, to developments granted permission prior to 1 September 2015, May 2016.'

The Planning and Development Act 2000 was issued on 28<sup>th</sup> August 2000. Section 96 of the Planning and Development Act 2000 (as amended) states that any development for residential use or for a mixture of residential and other uses shall provide a percentage of the proposed residential units for the purpose of social and affordable housing.

The current legislation regarding the transfer of residential units under Part V, as amended by the Residential Tenancies Act of 2014, requires a percentage of units to be transferred to the local authority.

## 7.2 Part V Proposal

The applicant proposes to fulfil their Part V obligations through entering into a lease agreement with the Planning Authority for the appropriate percentage of the housing units pursuant to Section 96(3) paragraph (b)(iv) of the Act. The applicant confirms their willingness to enter into an agreement with Meath County Council in respect of Part V (Social and Affordable Housing) should a grant of planning permission be forthcoming at the subject site, in accordance with the relevant provisions of the Planning and Development Act 2000 (as amended). Please refer to the Part V drawings prepared by NDBA Architects and the Part V Validation letter from Meath County Council for further details. The submitted layout provides for 11 no. one-bedroom apartments (all ground floor units), 10 no. two-bedroom midterrace houses and 4 no. three-bedroom mid-terrace houses for Part V purposes (25 no. units total).

# 8.0 Environmental/Appropriate Assessment

In accordance with Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended), an Environmental Impact Assessment Report (EIAR) is required for infrastructural projects comprising of:

- Construction of more than 500 dwelling units;
- Construction of a shopping centre with a gross floorspace exceeding 10,000 square metres; and
- Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up areas and 20 hectares elsewhere

Notwithstanding the fact that the proposed development of 249 no. residential units on a site of 9.2 hectares is sub-threshold with regards to the thresholds presented above, an Environmental Impact Assessment Report, as prepared by DNV, has been included to assess the potential effects of the proposed project on the receiving environment. The decision to prepare an EIAR is considered appropriate in the context of demonstrating that there are no apparent characteristics or elements of the design of the scheme that are likely to cause significant effects on the environment.

## 9.0 Conclusion

In conclusion, we submit that the proposal, which is comprised of the construction of 249 no. residential units and a creche facility at this site in Drogheda, is acceptable and compliant with the policies and objectives as set out in the applicable national, regional and local planning policy context.

At a national and regional level, this statement has demonstrated consistency with the following:

- Project Ireland 2040 National Planning Framework;
- National Development Plan 2021-2030;
- Urban Development and Building Heights Guidelines for Planning Authorities, December 2020;
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024);
- Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019);
- Housing For All A New Housing Plan for Ireland (2021);
- Smarter Travel: A Sustainable Transport Future A New Transport Policy for Ireland (2009):
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025);
- Quality Housing for Sustainable Communities Guidelines for Planning Authorities (2007);
- Planning Strategy for Greater Drogheda Area; and
- South Drogheda Urban Area Plan.

Consistency is also demonstrated with the policies and provisions of the Meath Development Plan 2021-2027 which is a key planning policy document at a local level. We submit that the proposed development represents an appropriately scaled residential scheme on residentially zoned land. The application site, being located within the environs of the growing town of Drogheda has the capacity to accommodate additional residential accommodation at the scale proposed.

The development has been designed to an exceptionally high standard to contribute to the area and it is considered that the proposal will not give rise to any undue impacts on the amenity of any adjacent properties. We are of the opinion that the development is generally compliant and in accordance with the qualitative and quantitative standards as set out in the relevant statutory development plans and other national guidance documents.

On the basis of the foregoing, we respectfully request that Meath County Council see fit to grant permission for the proposed development, subject to appropriate conditions.

Kevin Hughes MIPI MRTPI Director for HPDC Ltd. Appendix A Section 247 Pre-Planning Consultation Meeting Minutes as Issued by Meath County Council

# Comhairle Chontae na Mí

Roinn Pleanáil, Teach Buvinda, Bóthar Átha Cliath, An Uaimh, Contae na Mí, C15 Y291 **Fón: 046 – 9097500/Fax: 046 – 9097001** R-phost: planning@meathcoco.ie

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# **Meath County Council**

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## MINUTES OF SECTION 247 - PRE-PLANNING CONSULTATION

Pre-Application Reference Number	LRD0036 Earlsfort Developments Ltd		
Meeting Type	Section 247 Meeting		
Date	06/11/2024	Start Time	11.00
Location	Newgrange Meeting Room (In Person & MS Teams)	End Time	12.13
Chairperson	Deirdre Fallon		

Prospective Applicant	Earlsfort Developments Ltd (previously Trailford Ltd.)	
Proposed Development Address	Rathmullan Road, Oldbridge, Drogheda, Co. Meath	
Proposed Development Description	Large-scale Residential Development of 243 residential units	
Zoning	F1, WL, A2) Zoning (MCDP Variation) & Order of the High Court	
	made on 03/05/2023	
Density	35.1 dwellings per hectare (net site)	
Site Location Map	'Site Location Map' submitted.	
Interest in land	Trailford Ltd. are landowner	

## **Attendees:**

<u>Applicant (Online)</u>: Project Planning Consultant - Kevin Hughes (KH), Hughes Planning & Consulting; Project Planning Consultant - Gerard Harris (GH); Project Architect - Jude O'Loughlin (JOL), NDBA; Project Engineer - Joe Gibbons (JG), Waterman Moylan; Project Landscaper - Lucy Carey (LC), CSRL Landscaping; Chiara Ferrari (CF) - CSRL Landscaping; Applicant Representatives - Bartek Wytwskovski (BW), Earlsfort Developments Ltd.

Meath County Council (In Person): Deidre Fallon (DF) (Chair); Teresa O'Reilly (TOR) Joe McGarvey (JMG); Damien O'Brien (DOB), Alan Wall (AW), Triona Keating (TK) and Alison Condra (AC).

#### **Abbreviations:**

An Bord Pleanála (ABP)
Appropriate Assessment (AA)

Confirmation of feasibility (COF)

Design Manual for Urban Streets and Roads

(DMURS)

Environmental Impact Assessment Report

(EIAR) Flood Risk Assessment (FRA)

Land Development Agency (LDA)

Local Area Plan (LAP)

Large-Scale Residential Development (LRD)

Masterplan (MP)

Meath County Council (MCC)

Meath County Development Plan (MCDP)

Masterplan (MP)

National Planning Framework (NPF)

Natura Impact Statement (NIS)

Regional Spatial & Economic Strategies (RSES)

Roads Safety Audit (RSA)

Strategic Environmental Assessment (SEA) Social Infrastructure Assessment (SIA)

Statement of Design Acceptance (SODA)

Strategic Employment Site (SES)

Strategic Housing Development (SHD)
Surface Water (SW)
Sustainable Drainage System (SuDS)

Taking In Charge (TIC) Traffic & Transport Assessment (TTA) Traffic Impact Assessment (TIA) Uisce Éireann (UÉ)/ Irish Water (IW)

#### Disclaimer

**Please Note** that advice, feedback and opinion offered at consultation is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act 2000, as amended, and in accordance with the provisions of the Planning and Development (Amendment) (Large-Scale Residential Development) Act 2021.

#### 1. Introduction

DF welcomed all to the meeting and introduced the Meath Co. Co. team in attendance and advised on the nature of the meeting.

GH gave a brief history of the site and the previous two permissions on the lands, the last being in 2002 prior to a portion of the lands being de-zoned. The current proposal was for 243 units and crèche with a density of 35.1 units per hectare with the following breakdown:

22 x 1 bed units 9 % 86 x 2 bed units 35% 87 x 3 bed units 35% 24x 2 bed units 9.8%

The layout of the scheme is designed to enhance the focal points of the site and create a sense of place and character.

JO'L outlined that access would be from the Rathmullen Road as this was the only feasible location. The layout was designed to maximise the east- west orientation of the site and offered increase capacity due to the new density guidelines and apartment blocks would bookend both sides of the terraced homes. A curved entrance road would follow the existing site layout. The site was mid-density due to the domestic residential scale of the development.

JG commented on the Engineering Statement which highlighted the substantial level differences on the site which falls from south to north. A Pre-Connection enquiry was lodged with Irish Water for the 243 no. units. Previously a Confirmation of Feasibility was submitted for 2 no x 98 units and IW issued a COF with the request for the developer to provide a pumping station on the site as well as a c.240-metre upgrade of water pipeline and valve on the Rathmullen Road. An indicative FW drainage plan was included and will connect to the rising main at Marley's Lane.

Surface water drainage was divided into two sections – north & south. North is in green space and will incorporate suitable SUDS such as attenuation areas, grass swale, permeable paving and comply with the surface drainage guidelines. The southern section is at the heart of the development.

Roads layout includes a main access route which then branch to DMURS local streets at 5.5 metres width. Access to the development is via a signaled control junction on the Oldbridge Road and will be in

accordance with the cycling manual. Parking will be in accordance with the County Development Plan. Works are currently underway on the Greenway and once finished the design will be incorporated into the scheme.

Regarding Flooding, the CFRAM maps are under review by the OPW since the building of the M1 Motorway severed a drain which flowed onto the site. A full Flood Risk Assessment will be included for the site.

Landscaping: LC outlined the site and landscape contest of the developments which will protect the views of the Boyne Bridge and surrounding landscape. The plan will address creating a neighbourhood, protecting & improving the site edges, addressing noise from the motorway and well as creating pocket amenity spaces. Connection and linkages will be provided for a mix of pedestrian and cycle routes. There will be a central open space which will incorporate green swales for the SUDS system as well as a woodland ring around the site.

## 2. Zoning, Phasing, Core Strategy, Density provisions of the MCDP

TOR referred to the S.247 Minutes for LRD0022 which remain applicable, and the applicant is requested to consider these again.

Zoning of the site is F1, WL, A2 (MCDP Variation) & Order of the High Court made on 03/05/2023.

A Phasing plan to be provided for the LRD Meeting, which is sufficiently detailed, childcare in Phase 1, POS, etc.

Core Strategy has sufficient capacity at present to accommodate the proposed development.

Drogheda is a Regional Growth Centre and the density of 35 units/ ha is a the lowest range. The Section 28 Guidelines Compact Settlement Guidelines (January, 2024) Section 3.3.2 'Regional Growth Centres' and (ii) Suburban/ Urban Extension locations requires a range between 35 and 50 units per ha (net) and densities of up to 100 units/ ha (net) shall be open for consideration at accessible locations. This needs to be addressed in your Statement of Consistency and a revised layout.

## 3. Design, Unit Mix, Residential Amenity, Compliance with standards, Childcare, etc.

DF referred to the need to address/ give further attention to the feedback previously issued at the S.247 Meeting. The applicant is requested to review the interface with the adjoining White Lands (WL) to the south. The current layout shown of walls flanking the boundary is not considered acceptable.

There is an opportunity to provide greater architecture interest/ focal point at the entrance to the site.

Units to the south-west also require a focal point with filtered permeability to the location.

Public open space should offer greater residential amenity. Much of the public open space shown is very linear with large SuDS features.

Regarding the apartment blocks, there needs to be a differentiation between private, communal and public spaces. There is a narrow lane between units 16 and 50/51 and consideration should be given to either omitting it or widening it to provide greater security. Passive surveillance is particularly important and needs to be provided here.

There isn't a clear street hierarchy within the scheme. The applicant is requested to provide a map outlining the FI open space and what area is to be used for SUDS.

An inward noise assessment is required and noise mitigation measures should be included within the scheme given its proximity to the M1.

With reference to the Compact Settlement Guidelines and the Variation No. 3 of the Meath CDP, which is currently on display, the onus is on the applicant to demonstrate the quality of the scheme and the residential standards.

TOR advised that a full Housing Quality Assessment for all units within the scheme will need to be provided for the LRD Meeting/ Application with a full breakdown of all details for each unit, private open space, storage, room sizes, etc.

The applicant should demonstrate how the development would incorporate with other lands if they were to be developed and demonstrate inter-connectivity.

Currently the entrance area/ entrance to the site is overly suburban and requires a stronger architectural presence.

LC referred to the need to overlook units no. 16, 50 & 51 and it was indicated that this lane could be reviewed and widened.

JOL highlighted the difficulty presented by the changing levels at the entrance to the site, which are 5m below the site level.

LC agreed to review and would forward some concepts before Stage 2.

TOR noted that 16m separation distance has been applied. The internal design of dwellings must be carefully considered to avoid overlooking of adjoining private gardens (e.g. placing W.C. at FFL to the rear).

Private and public open spaces should be usable and functional. Public open space (P.O.S.) of 10.2% is above the minimum in the Compact Settlement Guidelines, however this has now been integrated into the MCDP Variation no. 3 and 15% is the minimum. F1 lands must not be included in the POS calculation. Private open space (minimum) requirements are set out at 5.3.2 in the Guidelines.

A detailed Design Statement (including CGIs, etc.) is required – please see S.247 Meeting comments and requirements of the Meath CDP Chapter 11 - DM OBJ 13, Section 11.5.17 'Apartments', etc.

The proposed/ revised location for apartments along the road should create a more formal entrance to the scheme, which is welcomed, however consideration must be given to the on-site levels.

Clear focal points are needed within the scheme. Structures should encapsulate a high-quality design and distinct character areas should be created. There appears to be limited differentiation. A mix of heights should impress the status and use of different components of the scheme. This needs to be considered in further design iterations as density is addressed.

A mix of building heights are required and SPPRs in the Building Height Guidelines are to be addressed. Note that Drogheda Environs identified under SPPR1 in the MCDP.

Connectivity and Permeability - illustrate very broadly (high level block plan) how the remainder of the lands could be developed. Consider other comments in S.247 in relation to permeability.

No community facilities are being provided in this iteration. Consider what could be provided alongside the creche e.g. retail. A Social Infrastructure Assessment must be submitted with any future planning application.

No duplexes proposed —a mix of unit types and tenures to meet the needs of the area must be demonstrated and there must be clear justification for the proposal (as per the Meath CDP). Policy DM POL 6 refers: To require that the unit typologies proposed provide a sufficient unit mix which addresses wider demographic and household formation trends.

The Design Statement required at DM OBJ 13 shall set out how the proposed scheme is compliant with same.

First block to houses the north-east of the apartments should front onto the road/ main route through the estate and around the open space (0.49 ha). Proposal should include buildings with a raised height (e.g. 3/4 storey or a mix with higher bookends, etc.).

Blank walls along the main route within the scheme and open space (0.49ha) should be avoided with active frontage provided which is particularly important for passive supervision as well as visual aesthetic.

Corner units within each cell must have dual facades/ frontage.

Consider putting apartments over a shop.

A Crèche should have sufficient outdoor play space. This is currently along the rear gardens of adjoining terraced houses. Consider the privacy of the children's play area and residences. It may be better to separate out the crèche into an area on its own, typically close to Public Open Space. Note that F1 zoning allows for a creche, provided no flood risk issues, etc. A reworking of this cell with houses, créche and shop is advised. The applicant should ensure there is a childcare provider on board to advise of their needs, ensure the design is suitable to have it operational quickly.

Bin/ bike structures to be included in the design. Full landscaping and boundary treatment details are required.

Refer to all other comments made during the S.247 meeting for LRD0022, the Meath Co. Development Plan (CDP) Chapter 11, Section 28 Guidelines (e.g. Compact Settlement, Apartment, Building Heights, etc.) and the policy and development management requirements therein.

TOR noted that the visual impacts of the development must be considered with CGIs and contiguous elevations to be provided.

# 4. Traffic and Transport, DMURS, Public Lighting, etc.

JMG stated that a full Traffic & Transport Assessment is required, and the application needs to consider how the various junctions are impacted. It must validate that they have capacity including that of Marley's Lane in Co. Louth.

The internal road networks should be DMURS compliant, show the key linkages and make provision for any future bus/ transport routes should any further lands be rezoned. Cycle paths should follow desire lines and link to schools and town centre. The housing units to the SW have no linkages and a DUMRS quality audit should be completed.

Regarding the proposed upgrade to the Oldbridge Road, due to width restrictions a setback will be required for the development to allow road widening, and any plans need to cater for a junction to the Greenway. The road width should be 5 meters wide plus a shared surface for pedestrians & cyclists. Provision should be made for a link between the site to the greenway. The Planning Authority would like to see more permeability between the site and the Oldbridge Road.

JMG said the NIS for the scheme was prepared. Works to determine the existing road width are underway with the scraping away of vegetation but there is reduced scope on the eastern side of the road. No details design has been carried out yet, a topographical survey is underway, and the final design will be shared with the applicant once completed.

Existing access points to the Oldbridge Roads should be used at locations of existing access.

Car & cycle parking should be provided in line with the MCDP. Attention was drawn to Variation 3 to the Meath County Development Plan in this regard. To encourage modal shift from cars, cycling storage should be provided. EV charging is also required and it is important to consult with ESB early in the design of a network for the housing estate.

JG confirmed the TTA would be submitted and confirmed that traffic counts have been completed. The plans for the entrance would be reviewed, however due to levels the area was hard to work with.

TOR referred to the parking considerations at the shop and crèche.

TOR referred to Public Lighting comments provided for the meeting. Public lighting was not designed and shall be provided to all public spaces within the confines of the development (including road frontage). The public lighting shall be designed and installed as per "Meath County Councils; Public

Lighting Technical Specification & Requirements" document. The applicant is requested to submit a public lighting design in accordance with above specification.

## 5. Flood Risk Assessment & Management & Surface Water Drainage

AW referred to the discharge was to an existing 1200mm culvert and the need for a survey of this to be conducted. All detention basins are to be positively drained and should not affect the open space. Details section of the pond is to be provided and a detailed topographical survey of the site is required.

DOB noted that the CFRAM map is currently being updated and the site is currently located in Flood Zone C. A commensuration flood risk is to be submitted. A detailed survey is to be included and include overland conveyance routes from the site. A Masterplan of the entire site is requested with a high-level detail of the other zonings to be included. A map should include the zoned green spaces and should ensure that they can be used for nature-based solutions.

JOL clarified that there was a gap between the red and green zones.

Clarification was required on the location of the pumping station and the separation distances to the houses, and it was recommended a Noise and Odour Assessment be carried out.

DF requested further details on the land take required for the pumping station, a visual of what it would look like over and underground.

DOB stated that surface water outfall cross sections are to be provided, details of the cross fall and the slope of embankments are required for maintenance purposes and should demonstrate where access can be provided for the tanker. Detail is required on the above ground infrastructure to assess its suitability.

## 6. Water Supply and Wastewater Treatment

TOR advised that Barry Kelly (UÉ) was unable to attend the meeting, but provided the following comments:

UÉ can confirm that two separate Confirmation of Feasibilities (COF) were issued for two separate phases of the site (each one amounting to 99 no. units). These COFs were issued on the 20<sup>th</sup> August, 2024.

In terms of the Water Connections, both COFs stated that connections are feasible subject to upgrades. Upgrades work include increases to the capacity of the existing UÉ watermain network, extensions to the existing watermain network and the provision of a Flow Control Valve to be laid as part of the network extensions. These works are not currently on the UÉ investment plan therefore, the applicant will be required to fund these local network upgrades. The fee will be calculated at connection application stage.

In terms of the Wastewater Connections, both COFs stated that connections are feasible subject to upgrades. The applicant is to provide for additional upsizing and storage at proposed Pumping Station (PS) to accommodate diversion of flows from Riverbank / Dale PS and Old Bridge Manor PS. These works

are not currently on the UÉ investment plan therefore, the applicant will be required to fund these local network upgrades and the decommissioning of the Dale/Riverbank PS. The applicant could utilize the existing rising main from the Dale / Riverbank PS for approximately 300 no. units from the proposed site after which the rising main will need to be upgraded. The number of units will be again assessed at connection application stage. It is important to note the UÉ does not have funding to support any of the works noted above'

Given the current proposal has increased the number of proposed residential units to 240. no. residential units, a new Pre – Connection Enquiry will have to be submitted to UÉ for an updated assessment. There is an average period of about 16 no. weeks to assess any given Pre-Connection Enquiry application. It is important that the outcomes of the Pre-Connection Enquiry application (i.e. Confirmation of Feasibility letter) has been obtained by the applicant prior to the lodgement of the formal planning application.

It is recommended that a SODA be in place and submitted at full planning application stage.

EIAR-If the proposed development is required to submit an Environmental Impact Assessment Report, then the applicant is required to submit an EIAR Scoping document to UÉ in order for us to have an opportunity to provide our feedback on areas pertaining to UÉ infrastructure etc. All EIAR Scoping requests can be forwarded to <a href="mailto:planning@water.ie">planning@water.ie</a>

UÉ will have the opportunity to provide further observations pending the outcomes of the Pre-Connection Enquiry application and at the formal planning application lodgement stage.

# 7. EIA, AA & other Environmental Assessments

EcIA or EIAR & AA Screening and NIS (River Boyne SAC and SPA) to be submitted and all relevant survey to be carried out at the appropriate time by personnel with requisite qualifications and experience.

## 8. Landscape Strategy & Management, Amenity Space, etc.

Landscape statement to demonstrate the required open space and the delivery and functionality/amenity value for the span of age groups.

A full arboricultural assessment, boundary treatment details. Mapping to identify street planting and the location of services throughout the scheme.

## 9. Housing Part V/LDA (Part 9), Universal Design

The applicant stated that a full proposal will be provided with Stage 2 consultation. The percentage provision is to be calculated once the supporting information is provided to the Housing Dept. The applicant was advised to contact Mr. Gerard Soady in relation to confirming what MCC's demand is and what the most suitable type of units were required. Contact details are gerard.soady@meathcoco.ie.

The Part V obligation of 10% or 20% must first be established. To establish the 10% or 20% obligation it must be confirmed by written verification from legal representatives of the owners setting the date of land purchase. It must be noted that that the 10% or 20% requirement does **not** directly relate to the number of units on a development, it relates to the acquisition 10% or 20% of this land at existing use value and 10% or 20% equivalent of the plot size of all the residential properties. Part of the evaluation process will

include the Part V property type and location within the development, which compliments the housing needs of Meath County Council. No proposal has been submitted so cannot comment on same. If a 20% obligation is determined, a minimum of 10% is required to be made available for social housing and the remainder will be made available as affordable units to be purchased by persons nominated by Meath County Council directly from the developer. Further information will issue once the Part V obligation is clarified. The Applicant will be required to submit a complete Part V proposal prior to commencement (if planning permission is granted) to be considered by Meath County Council.

A minimum of 5% universal design units are to be supplied in the development. The applicant is referred to *Secure by Design* Guidance in the design and layout of the scheme.

## 10. Cultural Heritage - Archaeology

Cultural Heritage to be addressed in the application indicating the close proximity to Brú na Bóinne. MCC's Archaeologist has advised that

- 1. The referenced Archaeology and Built Heritage report should be included in the Planning documents. This report should contain a plan and detailed results of the 07R0190 and follow-up testing 08E0506 report, which should now be available from archaeology.ie Reports portal.
- 2. The Archaeology and Built Heritage should include proposed mitigations that may comprise:
  - (a) Metal detection survey of ploughed topsoil in regular transects to determine if there are any artefacts from the Battle of the Boyne 1690.
  - (b) Increase the area of trial trench testing across the site to a level of 12%, present the results and propose mitigation in the form of an Archaeological Impact Assessment, copied to the Local Authority. This mitigation (typically preservation in situ or rescue excavations) should then be completed before construction starts. With this approach, those areas without archaeological remains can usually be left for construction without monitoring, with the agreement of the National Monuments Service.
  - (c) Clarify the location, date nature and extent of SMR Enclosure ME020-072. This seems to have been partly tested in 08E0506 and additional testing is required for further information to determine the mitigation.
  - (d) The area of Enclosure ME020-088 and its Notification Zone adjacent to the development is a vulnerable monument located under 0.30m topsoil. How is this due to be preserved during construction of the present proposed scheme and potentially into the future?
  - (e) A build heritage survey of the derelict farm buildings and Rathmullan Road roadside boundary wall is required to determine if any further mitigation is required.
  - (f) The location and extent of the heritage 'demesne landscape' woodland on the site should be preserved where feasible.

This large-scale residential development is on a site that contains and is adjacent to known archaeological remains. Therefore, a comprehensive mitigation strategy – suitable staged as appropriate – is required to be presented by the developer to ensure the preservation in situ or by record of archaeological, architectural and cultural heritage remains.

# 12. Any Other Issues

DF advised that the Broadband Officer has noted that no Broadband Plans were supplied with this application. These will need to be provided, and new regulations require plans for in-building telecommunications networks to be designed and submitted prior to construction.

DF said a Social Infrastructure Assessment is required as part of the application, outlining the schools, childcare, retailing offering and provision of other services in the area.

#### 13. A.O.B.

JOL sought a comment on the unit mix stating that they could increase the 3 bed numbers if required.

GH queried if there was any update on the Joint Drogheda Local Area Plan. MCC to revert following consultation with the with the Forward Planning Team.

The Meeting ended at 12.13pm.

Deirdre Fallon

Senior Executive Planner

1400an

Alison Condra

Administrative Officer

al. S. Carolia.

Section 32 LRD Consultation Meeting Minutes as Issued by Meath County Council Appendix B

# Comhairle Chontae na Mí

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Teach Buvinda, Bóthar Átha Cliath,

An Uaimh, Contae na Mí, C15 Y291 **Fón: 046 – 9097500/Fax: 046 – 9097001**R-phost: planning@meathcoco.ie



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# MINUTES OF LRD MEETING – PREPLANNING CONSULTATION

Pre-Application Reference	LRD0036			
Number				
Meeting Type	LRD Meeting (Section	LRD Meeting (Section 32)		
Date	05 March 2025	Start Time	11:02	
Location	In Person & MS	End Time	12:25	
	Teams			
Chairperson	Teresa O'Reilly			

Prospective Applicant	Earlsfort Development Drogheda Ltd	
• • • • • • • • • • • • • • • • • • • •		
Proposed Development Address	Rathmullen Road, Oldbridge, Drogheda	
Proposed Development	The development will consist of 244 no. residential units and a	
Description	crèche facility, as follows:	
	(i) demolition/removal of all existing farm buildings/structures, existing vehicular entrance off Rathmullen Road and associated hard standing on site;	
	(ii) construction of a residential development comprising 180 no. houses (including 32 no. two-bedroom houses, 121 no. three-bedroom houses and 25 no. four-bedroom houses) and 32 no. duplex buildings (accommodating 16 no. one-bedroom and 16 no. two-bedroom units) and 8 no. three storey apartments blocks each accommodating 2 no. one-bedroom apartments and 2 no. two-bedroom apartments (for a total of 16 no. one-bedroom and 16 no. two-bedroom apartments);	
	(iii) construction of a new vehicular entrance and access road off Rathmullen Road with associated junction works and associated in ternal access road network with pedestrian and cyclist infrastructure;	
	(iv) provision of a creche facility with external play area; and,	
	(v) all ancillary site and infrastructural works, inclusive of removal of existing vehicular entrances, provision of landscaped public open space area to the north of the site to	

	be subsequently ceded to Meath County Council, general landscaping and public open space provision, boundary treatments, foul/surface water drainage, attenuation areas and provision of pumping station, as necessary to facilitate the proposed development.
	Each house will be served by vehicular parking to the front and private amenity space in the form of a rear garden. Each duplex building will be served by vehicular parking to the front and private amenity space in the form of the form of balcony/terrace spaces to the rear. Each apartment block will have shared access to adjoining bin stores, car parking bays and bicycle parking bays and each apartment will be provided with private amenity space in the form of a balcony or terrace.
Zoning	A2, F1
Density	35.2 dwellings/ha
Site Location Map	Drawing: 'PL-SP-01 Site Location Plan'
Interest in land	Landowner

### **Attendees**

<u>Applicant (Online)</u>: David Fitzpatrick (DF) & Conor Gallagher (CG) - Applicant representatives; Gerard Harris (GH)- HPDC - Project Planner; Jude O'Loughlin (JOL) - NDBA Architects - Project Architect, Bartek Wytykowski (BW) - NDBA Architects - Project Architect; Joe Gibbons (JG) - Waterman Moylan - Project Engineer; Lucy Carey (LC) - CSR Landscaping - Project Landscaper; Chiarra Ferrari (CF) - CSR Landscaping - Project Landscaper; Kevin Cleary (KC) - Verde Environmental - Project Ecologist; David Casey (DC) - JBA Consulting - Appointed Flood Risk Consultant; Michelle Gaffney (MG) and Catherine Keogan (CK) – Enviroguide; and Jason McLoughlin.

Meath County Council (In Person): Alan Russell (AR); Teresa O'Reilly (TOR); David Keyes (DK); Adrian Santry (AS); Damien O'Brien (DOB); Jinya Qu (JQ); John McGearty (JM).

<u>Uisce Éireann</u>: *Apologies*: Barry Kelly (UÉ).

### **Abbreviations:**

- An Bord Pleanála (ABP)
- Appropriate Assessment (AA)
- Confirmation of feasibility (COF)
- Design Manual for Urban Streets and Roads (DMURS)
- Environmental Impact Assessment Report (EIAR) Flood Risk Assessment (FRA)
- Land Development Agency (LDA)

- Local Area Plan (LAP)
- Large-Scale Residential Development (LRD)
- Masterplan (MP)
- Meath County Council (MCC)
- Meath County Development Plan (MCDP)
- Masterplan (MP)
- National Planning Framework (NPF)

- Natura Impact Statement (NIS)
- Regional Spatial & Economic Strategies (RSES)
- Roads Safety Audit (RSA)
- Strategic Environmental Assessment (SEA)
- Social Infrastructure Assessment (SIA)
- Statement of Design Acceptance (SODA)
- Strategic Employment Site (SES)

- Strategic Housing Development (SHD)
- Surface Water (SW)
- Sustainable Drainage System (SuDS)
- Taking In Charge (TIC) Traffic & Transport Assessment (TTA)
- Traffic Impact Assessment (TIA)
- Uisce Éireann (UÉ)/ Irish Water (IW)

### Disclaimer

**Please Note** that advice, feedback and opinion offered at consultation is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act 2000, as amended, and in accordance with the provisions of the Planning and Development (Amendment) (Large-Scale Residential Development) Act 2021.

#### 1. Introduction

TOR welcomed all present and introduced the Meath County Council representatives. TOR confirmed that the meeting was an LRD Meeting (Section 32), referred to in the LRD legislation with the aim to give feedback on the proposal to progress the proposed development to a formal application, following the publication of the LRD Opinion.

TOR invited the applicant to give a brief outline on the proposal if they so wished and confirmed that minutes of the meeting will be made available when compiled. She noted the proposal for:

- 180 no. houses (32 no. 2-Bed units; 121 no. 3-Bed units; 25 no. 4-Bed units)
- 32 no. duplex buildings (16 no. 1-Bed and 16 no. 2-Bed units)
- 8 no. 3-storey apartments blocks (2 no. 1-Bed apartments and 2 no. 2-Bed apartments (total of 16 no. 1-Bed and 16 no. 2-Bed apartments))
- Crèche

GH confirmed that the team were happy to continue with the meeting without making any presentation.

## 2. Site Zoning, Phasing, Core Strategy & Density provisions of the MCDP

Zoning - TOR referred to the role of Drogheda as a Regional Growth Centre and the site located within the Southern Environs of Drogheda. She invited AR to discuss the zoning of the application site and area.

AR referred to recent Variations in the MCDP and the Joint Drogheda LAP which is to be developed for the area between Meath and Louth County Councils. In the Protect East Meath Court Case which challenged the MCDP, the Court ruled that there was a significant amount of over zoning of A2 residential lands, and a Settlement Capacity/ Infrastructure Audit was not published to support same. Circa 120 ha of A2 was dezoned.

AR stated that it was the intention of the Planning Authority to proceed with Variation No. 4 to the MCDP, which would be expected to go on public display circa April 2025. Some White Lands (WL) are being examined (not all 120 ha) and a limited amount would be identified for the remaining MCDP 2021-2027. The 4-year review of the MCDP is also proposed to commence in 2025 (Q2/Q3) when the Forward Planning provisions of the new Act are implemented.

The Forward Planning provisions of the New Planning & Development Act 2024 requires the preparation of a Coordinated Area Plan. The new CDP will be for a duration of 10 years, with a predraft consultation (Strategic Issues Paper) envisaged in May/June and a draft CDP expected to be ready for June '26. New zoning will be identified for all settlements in the Draft next MCDP and the new Act will then require a Coordinated Area Plan to be prepared for Drogheda. In the new CDP more lands will need to be zoned to accommodate a 10-year cycle.

GH queried if there was a standard consultation process, which AR confirmed.

GH requested further information regarding the status of the Joint LAP.

AR stated that there were 153 no. submissions on the Pre-Draft Issues Paper, and it was envisaged that a report would be finalised by the end of March 2025. Responses to submissions would be published. A date for the publication of a Draft UAP/Coordinated Area Plan is to be determined in consultation with Louth County Council.

TOR stated the LRD Opinion would issue within 4 weeks, and relevant advice would be included with same, should the Variation be public at that time.

TOR referred to A2 zoning, F1 Zoned lands including open space to the north of the site and adjoining White Lands (WL) which are not currently available for development.

AR requested a zoning overlay to be provided as part of the application.

TOR advised the applicant to ensure there was no encroachment on WLs; and F1 zoning cannot be used for P.O.S. calculation. The 15% requirement must be provided separately. The applicant's Statement of Consistency must address the capacity within the existing Core Strategy for the Southern Environs of Drogheda, noting that Variation no. 3 to the MCDP included text to address the role of Settlements. The applicant is advised to consider and provide details on any recent planning applications in the area. All Section 28 Guidelines to be considered including 2024 Compact Settlement, Apartment Guidelines, Building Height Guidelines, etc.

Density was confirmed to be at 35 by GH.

TOR stated density must remain at this level (or higher) with any amendments to the development prior to lodging an application. The applicant should explore any opportunity to increase same. Suburban/ Urban Extension locations require a range between 35 and 50 units per ha (net) as per the

Compact Settlement Guidelines. She noted that the Design Statement indicated a proposal of 40 units/ha, which may be in error.

Phasing of Development – TOR stated that phasing proposals should be submitted with any application as no details were provided for the LRD Meeting. This should include the delivery of a mix of units, new road infrastructure, open space and creche in the first phase of development with key infrastructure provided prior to the occupation of development.

### 3. Design, Unit Mix, Residential Amenity, Compliance with standards, Childcare, etc.

Connectivity to the Surrounding Area - TOR discussed the importance of the proposal being well connected to the surrounding area. Access to the greenway should be clearly provided as well as connections to the remainder of the landholding and externally to the surrounding area.

Architectural Design Statement - A Design Statement should be submitted and address the Urban Design Manual. Units must feature a high-quality design. The applicant was requested to provide CGIs and Contiguous Elevations within the application.

Layout - TOR referred to the visuals provided and the proposed viewpoints which are useful, though only provided from the entrance thus far. It is recommended that views are provided from the NE/SE & SW of the site, from within the Boulevard and Central P.O.S. and the same locations (as per photos) identified with the Planning Report lodged for the LRD Meeting. This will facilitate public consultation.

Enhancements to the entrance are required, with House Types 3.1 and 4.1 and there should not be any blank walls at this location. The finish to the house types at the entrance to the site are the only red brick within the development, and the applicant was urged to provide more variety in appearance throughout the development, with some of the dwellings being replaced by apartments. A modified apartment could replace unit 3.1 (RHS) and more animation/ activation is required at 4.1 (LHS). The entrance to the housing estate should be given greater emphasis.

The length of the units alongside the Boulevard is excessive and smaller cells need to be introduced. There are limited changes between unit types 3.7 and 3.8. The alley way proposal should be omitted from the final design.

Focal points - Apartments are used as focal points and can be further used in the development. The design of the apartments is acceptable; however, the privacy of balconies must be enhanced with activated corners.

The prominence of the Pumping Station is a concern, in terms of its size and suitable screening, as well as separation distance to dwellings. The usability of Public Open Space must be clearly demonstrated as part of any future planning application. The crèche is also a focal point and it must have nearby access to open space.

Character Areas – this has not been stated and there is a clear need for distinctiveness within the development. The applicant is requested to provide for a sense of place and variety within the development, a description of the character areas must be provided and the applicant needs to show greater changes throughout the development, e.g. there are only red brick units at the entrance.

Statement of Residential Amenity — This should demonstrate how the proposal meets the requirements of the 2024 Compact Settlement Guidelines and Apartment Guidelines 2023. Overlooking to be considered in any re-design. Separation distances between the units should be reexamined in the context of the 2024 Compact Settlement requirements. Some are at 8m, with a minimum of 16m required. Bedroom windows (first floor, rear elevation) which overlook rear gardens of other dwellings, could be replaced with bathrooms to increase privacy of adjoining properties.

All housing/ apartment/ duplex unit drawings to show left and right entry structures. This must be submitted with the application.

Bin/ cycle storage must feature robust finishes (i.e. brick surrounds), and this should be addressed in the Building Lifecycle Report which must be provided for the development. The applicant was urged to focus on robust materials in the main public facing areas of the development, focal points, etc. which require little maintenance.

*Passive supervision* must be achieved throughout the development with greater activation of corners/ frontage.

*Building Heights* are to be varied with only two-three storey height currently proposed across the scheme. SPPR1 of the Building Height Guidelines (and MCDP) identifies Drogheda as a location suitable for increased height. This must be addressed by the applicant.

*Unit mix* must be outlined in the LRD Application. Different types of units must be provided with the importance of variety of choice being delivered. The current proposal suggests a reasonable mix at 13% 1-bed, 27% 2-Bed, 50% 3-Bed and 10.2% 4-Bed, however, the MCDP requires any application to provide justification for the proposed unit mix. Please consider what is constructed in the area, demographics, etc.

*HQA* – any issues identified would be explored further in the LRD Opinion. TOR stressed the importance of ensuring structures are dual aspect, that the proposal includes for the provision of bulky storage, GFL – Floor to Ceiling Heights of 3m should be considered as is currently at the minimum of 2.7 metres.

*P.O.S.* – requirement of 15% applies (as per MCDP varied to incorporate 2024 S. 28 Guidelines). The applicant indicates that this is 16.77%, however F1 cannot be included in this calculation and a Statement regarding the <u>usability</u> and <u>functionality</u> of each space for the occupants of the new development is required. This must include active and passive space.

*Private Amenity* – This should be consistent with the requirements of the Compact Settlement Guidelines and Apartment Guidelines.

Daylight and Sunlight Assessment – is required, though it is noted that the applicant indicates that most units benefit from dual or triple aspects.

Plot ratio/ site coverage – details will need to be provided in accordance with the MCDP.

Childcare Facility – the applicant proposes a standalone unit in the north-east of the site adjoining some POS, stated as accommodating 50 no. children within 500sq.m. The applicant will need to demonstrate the minimum clear floorspace requirements and ensure that ancillary areas separate. Under provision will <u>not</u> be accepted. All requirements as per the 2001 Guidelines + 2016 Child Care Regulations are required. The applicant must consider the provision of outdoor space and the privacy of the outdoor space, and potential overlooking from apartments. In addition, the following must be addressed - boundary treatment, robust material finishes, bicycle and car parking spaces and waste storage, etc.

### 4.Traffic and Transport, Access, DMURS, Public Lighting, Car-parking, etc.

AS stated that the gradient of the cycle way at the main access point to the North is not acceptable.

There should be some access to the NE included in the design as the NW may not get the required sightlines and there is no access point to the Greenway at the NW.

JG referred to a lot of embankments which would need to be removed to provide this. The existing hedge is tight to the road and there is no crossing point to the north-east.

LC stated that barriers could be added to stop/ slow pedestrians at the crossing point, but the proposal could not work. She referred to the embankment, differences in levels and the need to retain the trees and limit the impact on these existing ecological features. The proposed pathway was to be 1:20, which can act as a cycleway as well. She referred to the desire lines within the F1 and POS area which are illustrated as shown, due to difference in levels.

AS referred to the footpath on the north side of the entrance and noted that a 2-way cycleway is a requirement in the Cycle Design Manual. The applicant must demonstrate that a bus can access the link street and exit onto the Sheephouse Rd. (Masterplan to be shown). At the access junction, a width of 6 metre and a footpath on either side is required. There must be sufficient width to access further/future development to the west.

He referred to the proposed alleyway which should be omitted, and the proposed retained wall.

He noted the corner radii and the requirements as per DMURS.

The applicant must provide the required amount of EV Charging at the proposed Apartments. The cycle storage should be in accordance with the Design Standards for New Apartments (2023) - located internally within the footprint of the apartment and comprise solid construction (brick and block). It must be able to accommodate cargo bikes and bikes with trailers.

To the west of the site, the applicant must demonstrate there is sufficient car-parking spaces. A max of 6 no. car-parking spaces together is required as per DMURS. Footpaths shall be at least 1.8 metres in width and include an additional verge of at least 0.3 metres where there is adjacent perpendicular car parking to cater for vehicle overhang, provide accessible parking spaces (comply with Part M) and cycle-parking at the crèche must also be addressed with space included for cargo bikes.

DMURS Statement – Road hierarchy does not match drawings submitted. All documents should be mutually explanatory and revised as necessary. The shared surface areas must be of sufficient width.

JG noted same and will contact the Transport Section before any proposal is submitted.

## 5. Surface Water/ Flood Risk Water/ Wastewater

TOR queried how would the pumping station be screened, noting concern with its prominence.

Flooding

TOR invited DOB for comment regarding flooding.

DOB stated that the FRA and other reports all showed a different red line boundary and queried whether the red line boundary (RLB) would include the Rathmullen Road. Road upgrades were not included on the development description. He stated that the red line boundary must be consistent across the development application documents. Similarly, the description of the proposal must be clear and consistent. If the Rathmullen Rd. is included in the boundary, this must be subject to Flood Risk Assessment. A 2-metre-wide footpath has been constructed by MCC.

JG confirmed that the Rathmullen Road was not inside the RLB, and showed the shared surface area constructed by MCC, currently a 2m wide footpath. The RLB can be amended if necessary. JG stated that this will be clarified for the application.

DOB confirmed the SSFRA should include the updated RLB. A 1200mm culvert has already been built.

JG confirmed the culvert was completed already and updated drawings will include same. JG stated that a headwall has already been constructed across the culvert and showed images of works completed recently on same.

DOB stated that a detailed topographical survey should be submitted for the entire site.

DK referred to the catchment in the area and capacity of same which should be assessed and results submitted as part of the assessment. The capacity in the 1200mm culvert to accommodate critical flows must be demonstrated.

Flooding on part of the site must be considered. The Flood Zones extend into the RLB and if the road is flooded, this needs to be taken into assessed in the SSFRA. The applicant was requested to apply the Justification Test. It is particularly important that there is a Flood Management Plan, if flooding should occur, particularly if the Rathmullen Rd. is inside the RLB.

DC advised that he would be preparing same.

DK stated that this should be discussed with MCC.

Surface Water

DOB requested that the applicant clarify the Soil Index Classification values for the site.

The location of the attenuation system in the north catchment is to be reviewed. There are steep banks so the attenuation type may need to be changed to suit site conditions and maintenance requirements.

There is a clash with the foul pumping station. This is not acceptable. Petrol interceptors must be placed upstream. The applicant must demonstrate the functionality of the Public Open Space and ensure that the proposals for SW won't affect this.

Storage tanks should be avoided, and SUDS features are to be agreed with Environment Section, as there is potential for more NBs (i.e. nature-based solutions).

JG stated that this will be addressed, noting that the attenuation to the north is challenging but they will come up with solutions.

## Wastewater

TOR stated that a representative from UÉ was not in attendance, but any comments provided would be included in the LRD Opinion.

# 6. Environmental Impact Assessment (EIA), Appropriate Assessment (AA) & Environmental Assessments

TOR stated that Environmental Assessments must inform the design/ location of the development. All reports shall clearly identify the author and their requisite qualifications and experience. All surveys should be carried out at the appropriate time of year.

An EIAR and AA Screening and NIS will be submitted with the application. It is noted that the EIAR addresses a site area of 9.15ha site and the applicant has indicated that a Scoping is being prepared and will be issued to UÉ in advance of planning application.

With regard to AA Screening and NIS - these should inform the proposed development. The site is 40-50 metres from the southern bank of the River Boyne, with the site elevated c. 10 metres above the riverbank. The applicant must carefully consider and assess the full extent of the red line boundary within the AA documents, the ZOI associated with the proposed development, provide a Method Statement for any works in Watercourses, assess all surface water, flood risk issues, public lighting, landscaping and any likely significant effects on the River Boyne European Sites, or other relevant Sites.

The applicant is urged to address the issues specifically raised in the J.R., namely silt and pollutants mobilised from the development site and significant impacts on avi-fauna QI in respect of ex-situ impacts on the Boyne Estuary SPA.

## 7. Landscape Strategy & Management, Amenity Space, etc.

TOR referred to the Landscaping Strategy and Design Report, Landscape Masterplan, areas 1-3 and sections submitted for the LRD Meeting. <u>15% Public Open Space</u> is now required as per Variation to the MCDP with an accompanying statement. This cannot include lands that are zoned as F1. This must be <u>usable and functional open space</u>. A hierarchy of active and passive uses, and a detailed breakdown should be provided. The applicant must demonstrate the usability of the spaces. SUDs in public open space should not affect the use of the POS. Details of play equipment and natural play spaces to be provided.

She noted that the applicant intends to provide an Arboricultural Assessment at the application stage, boundary treatment, street planting and location of services, etc. A Hedgerow Survey should also be provided.

Regarding Boundary Treatment, the applicant was advised that timber panelling is <u>not</u> permitted in rear gardens and must comply with the requirements of Chapter 11 of the MCDP (DM Standards).

Public Art is required and can be provided by way of payment or proposal with Arts Officer. It is recommended that this features in the public open space.

The Landscaping Strategy and detailed, site-specific Planting Schedule should be guided by the All-Ireland Pollinator Plan and contain native species, indigenous to the area and retain existing hedgerows and trees wherever possible.

A detailed breakdown of Private and Communal Spaces to be provided in accordance with the MCDP (as varied). Separation distances to be addressed (as discussed above).

## 8. Housing Part V/LDA (Part 9) Requirements/ Universal Design

TOR stated that comments from the Housing Dept. and relevant changes will be highlighted in the LRD Opinion. She noted the location of the Part V units shown, which are dispersed through development to satisfy requirements. The applicant was advised to liaise with the Housing Dept. regarding any amendments.

She noted that Variation no. 3 to MCDP introduced a requirement for Universal Design units within the scheme (an increase to) 15-30% of units and the applicant must provide a UD Statement. Units should be in accordance with 'Universal Design Guidelines for Homes in Ireland' (NDA) as per SH OBJ 22 and details are to be provided in a summary table by the applicant.

Variation no. 3 to the MCDP also included the requirement for a Community Safety Statement. This relates to the in-built safety design elements of the development, including defensible spaces in front of apartments/ houses, public lighting, which is appropriately placed and not affected by landscaping, active street frontage to promote passive supervision, etc.

# 9. Social Infrastructure Assessment (SIA)

TOR confirmed that a Social Infrastructure Assessment must form part of any application, taking account taken of the capacity of local schools, healthcare facilities, childcare facilities, community facilities, recreational facilities, retail and other services, etc. (typically within 2km). She noted that the applicant intends to provide this for the application. Access to healthcare facilities, other community facilities should be addressed including the connectivity to same.

The childcare assessment should be consistent with the SIA for the provision of adequate facilities including sufficient internal space and external play area. The developer is urged to consult with childcare operators who may be interested in the site and ensure the design is appropriate to their requirements and uptake. The applicant should consult the Meath County Childcare Committee.

A Schools Assessment should be undertaken and consider Dept. of Education guidance and publications, noting that there were proposals regarding schools' provision on this site in the past.

# 10. Cultural Heritage

The Conservation Officer has referred to several monuments in the vicinity of the development and the potential visibility from Oldbridge Estate and the Battle of the Boyne Site and Brú na Bóinne World Heritage site, therefore a <u>Visual Impact Assessment</u> needs to be provided with the application to rule out any visual interference or negative impact that this proposal would have on the setting and context of this historic protected sites. Further information regarding the VIA would be included in the LRD Opinion.

MCC's Archaeologist notes the site adjoins a buffer zone which protects the monuments of Newgrange, Knowth and Dowth and the documentation submitted - Archaeological Impact

Assessment and Method Statement. It is considered that this document provided gives good background information and mitigation, however there are untested areas, and specific issues will be highlighted in more detail in the LRD Opinion.

### 11. Other Environmental Issues

TOR advised applicant to consult with the Environment Section regarding the Construction Environment Management Plan (CEMP), C&D WMP, Operational WMP, Article 27 requirements, etc. The CEMP should address pest control, and an Ecological Clerk of Work should be employed to oversee implementation of mitigation measures. Bin storage must be easily accessed, comprise solid screening (i.e. brick or similar) and methods of cleaning down.

The development will be susceptible to noise from the Motorway (200m to the M1) to the west – EPA Noise Mapping/ MCC Noise Plan are to be reviewed, and the applicant is required to submit a Noise Impact Assessment. The location of the crèche and outdoor space should be considered in this assessment. Noise insultation requirements and other design requirements including noise mitigation measures should be addressed in the proposal with revisions made as necessary.

The Sustainability and Energy Efficiency design proposals (and a Statement) must be provided for the development.

# 12.Other Services/ Any Other Issues

Taking in Charge & Management Company - TOR stated that the applicant must outline the proposed areas which are to be Taken in Charge (TIC) and a Management Company is required. A TIC map must consider the Public Lighting requirements.

Public Lighting – the applicant has stated that this will be provided for the LRD Application. As per the details submitted, the site is elevated c. 10 metres above the riverbank. Therefore, the impact of lighting on bats and landscaping must be considered, together with the potential impact on the SAC, SPA, River Boyne + Boyne Estuary, etc.

*Telecoms/ Electrical* – The requirements of ESB must be considered with any electrical infrastructure crossing the site. To develop an appropriate EV Charging Strategy, the applicant is <u>urged</u> to consult with ESB early in the process.

Broadband Officer - Broadband and telecommunication networks have not been designed for this development. All units must be serviced in compliance with the Meath County Development Plan guidance and the EU Gigabit Infrastructure Act. In the event of a grant of permission, plans should be provided to MCC prior to commencement.

Estate Names – 'Boyne Ridge' is the proposal on the CGIs. The applicant is referred to Chapter 11 of the MCDP regarding requirements for Estate Names and the details to be submitted.

Fire Safety – The applicant should address all the requirements of the Fire Safety regulations.

Statement of Consistency - to be provided as part of the application.

## Other -

- 1 Hard Copy of all documents (including drawings) to be submitted as part of the application, even if this is an electronic submission.
- Public notices must reference that this is a 'LRD Application' as per Regulations particularly procedures in terms of notification of Cllrs, PA weekly lists, etc.
- Referral of application to Louth Co. Council, DAU (DAU, NPWS), etc.

Meeting concluded at 12:25pm

Teresa S Reiller

Teresa O'Reilly

Senior Executive Planner

29/03/2025

Alison Condra

Administrative Officer

Plion S. Carles

01/04/2025