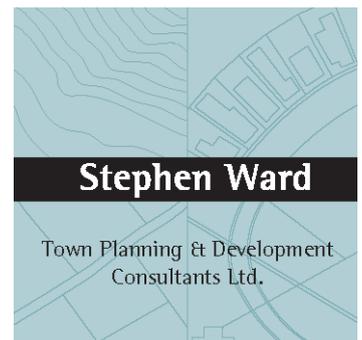


Planning Report and Statement of Consistency

**Proposed Strategic Housing Development at Clonminch Road,
Clonminch/Gayfield, Tullamore, Co.Offaly**



Prepared on behalf of
Steinfort Investments Fund



Stephen Ward

Town Planning & Development
Consultants Ltd.

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STRATEGIC HOUSING DEVELOPMENT – STATUTORY COMPLIANCE

This Statement of Consistency accompanies a planning application under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016 for a strategic housing development comprising of 349no. dwellings, crèche and two neighbourhood buildings on a site located to the east of the Clonminch Road (R443), in the townlands of Gayfield and Clonminch, Tullamore, Co. Offlay. The development also provides for cycle tracks and two new bus stops on Clonminch Road.

Table 1 below illustrates the proposed Strategic Housing Development in terms of its principle figures to provide a clear reference and to demonstrate in basic terms the characteristics of the proposed development.

Principle Figures		
Gross Site Area	14.28 hectares	
Net Development Area	11.45 hectare	
Net Residential Area	10.07ha	
Neighbourhood Centre lands	0.65ha	
Clonminch Road – Cycle Scheme	2.83ha	
Lands required for services infrastructure	0.73ha	
Public Open Space	16,207sq.m (16%)	
Building Height	1-4 storeys	
Residential Density	35 units per hectare ¹	
Total Residential Units	349	
Residential GFA	35,653.70sq.m	
Houses	196	
Apartments	153	
Residential Mix	41	1-bed
	103	2-bed
	155	3-bed
	50	4-bed
Crèche GFA	1,299sq.m	
Local Shop	56sq.m	
Neighbourhood Building 1	1,274sq.m	
Neighbourhood Building 2	1,733sq.m	
Non-residential GFA	4,362sq.m (max. 4,500sq.m)	
Total GFA of development proposed	40,015.70sq.m	
Car Parking	695	
Cycle Parking	315	

Table A: Principle Figures

¹ Density calculated on the basis of net residential development area of 10.07hectares

DEFINITION OF PROPOSAL AS A STRATEGIC HOUSING DEVELOPMENT

It is submitted that the proposed development meets with the definition of a Strategic Housing Development as provided by Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) as follows-

- The development is for 100 or more houses on land zoned for residential use or for a mixture of residential and other use – **The proposed development is for 349no. dwellings on lands zoned ‘Residential’ by the Tullamore Town and Environs Development Plan 2010-2016 (as varied and extended).** The area of land zoned Neighbourhood Centre is not defined by any field boundaries and the layout has sought to reflect the allocated within the TTEDP. Two neighbourhood buildings are proposed on lands zoned ‘Neighbourhood Centre’. Residential is a use that is considered ‘open for consideration’ on lands zoned Neighbourhood Centre.
- The cumulative gross floor area of the dwellings proposed comprise not less than 85% of the gross floor space of the proposed development – **residential development comprises 89% of the gross floor space proposed.**
- The other uses proposed cumulatively do not exceed 15sq.m gross floor space for each house subject to a maximum of 4,500sq.m - **the ‘other’ uses proposed include a childcare facility (1,299sq.m), local shop (56sq.m) and two neighbourhood centre buildings (3,007sq.m). The total gross floor space of non-residential uses 4,362sq.m represents 10% of the total gross floor space.**

COMPLIANCE WITH PART V

The applicant proposes to transfer 35no units in order to comply with Part V and create a mixed tenure within the proposed neighbourhood. A layout plan is included as part of this consultation request which identifies units proposed to be transferred (architect drawing no. 1757-PA-024). The applicant is willing to enter into an agreement should the proposed development be granted planning permission.

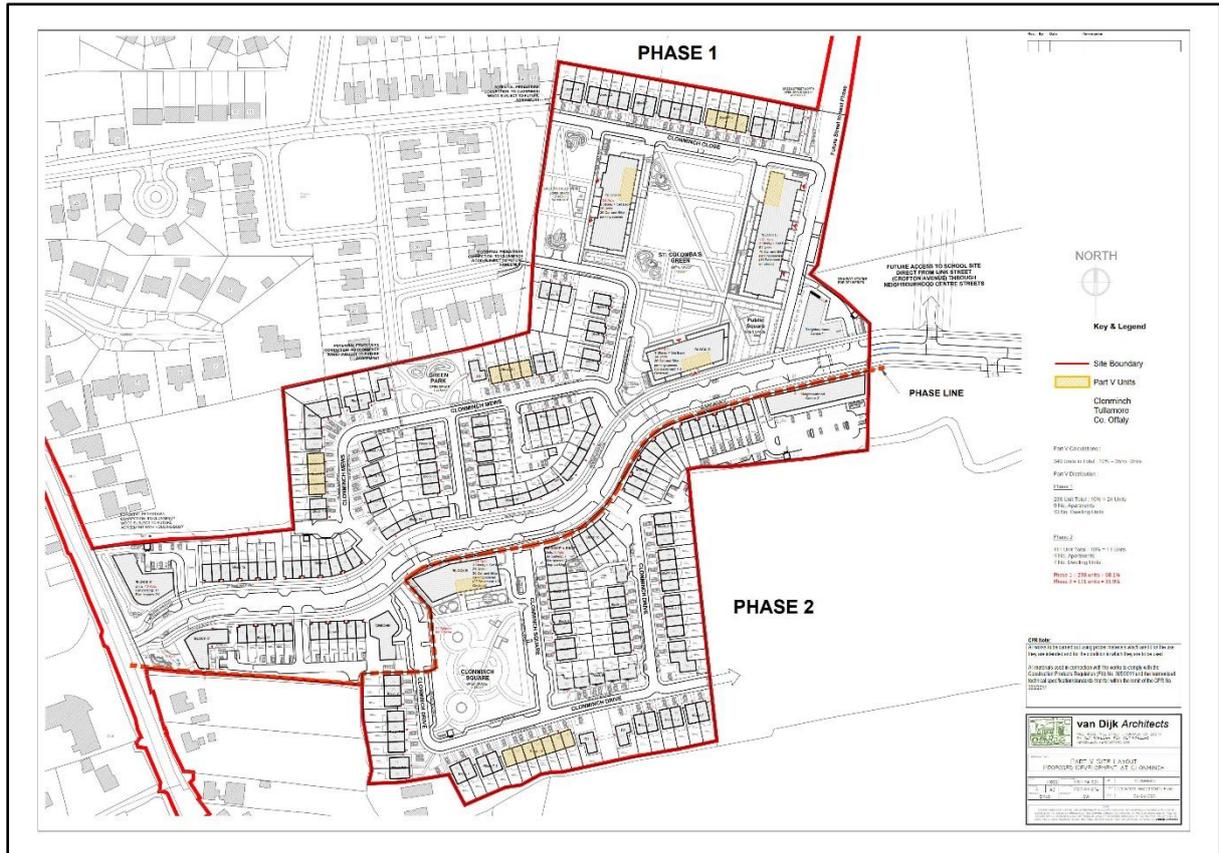


Figure B: Part V proposed distribution

STATEMENT FORMAT

Section One of this statement contains details of the planning history of the application site.

Section Two contains a description of the application site, its context and outlines the proposed development.

Section Three outlines the site's context within the national and regional planning policy framework.

Section Four states how the proposal is consistent with the following local planning policy documents -

- Offaly County Development Plan 2014-2020 (as varied)
- Tullamore Town & Environs Development Plan (as varied and extended until 2020).

Consistency with the Guidelines issued by the Minister under Section 28 of the Act of 2000 and other relevant Guidelines listed below are detailed at **Section Five** of this Statement-

- Sustainable Residential Development in Urban Area, Guidelines for Planning Authorities (2009) with the associated 'Best Practice Urban Design Manual',
- Sustainable Urban Housing: Design Standards for New Apartments (2020).
- Urban Development and Building Heights, Guidelines for Planning Authorities (December, 2018)
- The Design Manual for Urban Roads and Streets (2013)
- Childcare Facilities, Guidelines for Planning Authorities (2001)
- Appropriate Assessment of Plans and Projects – Guidance for Planning Authorities (2009)
- The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)

1.0 INTRODUCTION TO SITE AND PROJECT

1.1 PLANNING HISTORY

A Strategic Housing Planning Application was submitted to An Bord Pleanála relating to the subject lands on the 7th of August 2020 (Ref. ABP-307832). A decision to refuse permission was issued by An Bord Pleanála on the 25th of November 2020 for two reasons. This section of the statement summarises how the proposed development overcomes the stated reasons for refusal.

1.1.1 REASON FOR REFUSAL NO.1:

The design of the proposed Link Street, which is identified as an objective of the development plan for these Masterplan lands, linking Clonminch Road/R443 to the west and Chancery Lane to the north, is substandard in terms of its horizontal alignment and fails to have adequate regard to its strategic function and to the provisions of the Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport and the Department of the Environment, Community and Local Government in March 2019, as amended, in relation to such routes. The proposed development would, therefore, result in an unsatisfactory standard of development and would, therefore, be contrary to the proper planning and sustainable development of the area.

Applicants Response:

The horizontal alignment of the Link Street through the application site and the Eastern Node to where it crosses the railway tracks and meets with Chancery Lane has been reviewed by the design team and the site layout revised. The horizontal alignment of the proposed Link Street has full regard to its strategic function and to the provisions of the Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport and the Department of the Environment, Community and Local Government in March 2019, as amended. There are subtle changes of direction (never more than 45 degrees) and provision of parallel parking in bays along both sides of the vehicular carriageway add a traffic calming effect as envisaged in DMURS. The Link Street can cater for a public bus service and bus stops are proposed to be provided at the Neighbourhood Centre as part of the proposed development.

As recommended by the NTA in their submission to ABP-307832, the Link Street has been redesigned to provide for fully segregated cycle facilities on both sides and in a manner which maintains cyclist priority through side roads taking full account of the principles and templates set out in the National Cycle Manual.

The point where the Link Street ends after crossing the application site has been altered so that it is more closely aligns to the School Site. Access to the School site is now directly from the Link Street to the east of the application site. We envisage the neighbourhood centre lands becoming a village centre with the Link Street being the “main” street for the area with direct access to the neighbourhood centre buildings from the Link Street and dedicated car parking provided to the rear of the building line to maintain a strong urban street frontage. The crèche has been relocated into phase 1 as a standalone building. A local shop which can be accessed from the Link Street is proposed within Block F at the north east corner of Clonminch Square.

1.1.2 REASON FOR REFUSAL NO. 2:

The Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual, A Best Practice Guide, issued by the Department of the Environment, Heritage and Local Government in May 2009, includes key criteria for such development, including context, connections, layout, public realm and distinctiveness. The Design Manual for Urban Roads and Streets (DMURS) provides further guidance on the design and layout of streets in terms of the creation of sense of place.

It is considered that the proposed development is dominated by roads and surface car parking and results in a poor design concept for the site that is substandard in its form and layout, fails to establish a sense of place, and includes a poor quality of urban and architectural design. The development would, therefore, be injurious to the residential amenities of future occupants and would be contrary to the provisions of the Urban Design Manual – a Best Practice Guide, in particular criteria number 2 Connections and number 7 Layout, and provisions 2.2.1 of the Design Manual for Urban Roads and Streets. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Applicant's Response:

The realignment of the Link Street named Crofton Avenue as detailed above and the corresponding redesign of the road network throughout the application site provides a well-defined hierarchy based on a strategic function of the Link Street which will serve all community services and facilities and local streets that serve only residents.

Entrance to the development from Clonminch Road is clearly indicated by way of two apartment buildings. Housing either side of Crofton Avenue is three storey fronting the street and car parking courtyards have been introduced to allow buildings to front onto the Link Street providing an active edge and sense of enclosure as envisaged by DMURS section 2.2.1. This section of Crofton Avenue focuses ends with the three storey crèche building and Block B rising to 4 storeys punctuating the view from the entrance with glimpsed views of Clonminch Square to the south. The combination of increased height and strong urban provided by Block B and the turn of the Link Street northwards indicates the move into another area of the neighbourhood. The position of Block G to the north of the Link Street mimics Block B using the increased height to signify arrival with glimpsed views of St.Columba's Green. The use of building height and form in this way will provide orientation for pedestrians entering the new neighbourhood. The neighbourhood centre buildings are three storey in height and flank either side of the Link Street to give a focus to the commercial core and 'main street' for the neighbourhood. Car parking for the Neighbourhood Centre is provided to the south of the Link Street behind the Neighbourhood Centre Building to maintain the strong urban frontage. Additional car parking is provide on street. The link street is aligned to provide direct access to the school site to the east in the future. The link street will be brought to the site boundary as part of the proposed development.

Re-orientating housing to the north of Crofton Avenue provides greater permeability and facilitates improved connectivity for pedestrians with direct access to Local Streets from the Link Street and a visual link from the future pedestrian link to the north and Green Park towards Block B, the Link Street and Clonminch Square.

The previous proposal was identified as being dominated by roads and surface car parking. The revised proposal addresses this issue by the changes outlined above in terms of the road hierarchy and layout, a reduction in overall car parking provision but also by the introduction of basement car parks beneath apartment buildings B, D, E and G. 24% of car parking provided for residents within the proposed development is provided at basement level and a further 43% is in-curtilage. The inclusion of basement car parks below buildings D, E and G have also had a substantial impact on the layout at the northern part of the site by enabling the removal of streets and redesign of St.Columba's Green.

The previous proposal included a vehicular link to Clonminch Wood. While this was introduced in the interest of creating a more permeable neighbourhood and integrating existing residential areas, it is acknowledged that this would have extended an existing long straight residential access roads which would not adhere to the principles set out in DMURS. There is no vehicular access proposed from the application site to Clonminch Woods as part of this application, nor any other existing residential area. The layout has been designed to allow for pedestrian connectivity to Clonminch Woods and the Part 8 Oaklee development as well as surrounding development lands in the future. The internal road proposed called Clonminch Close has been aligned to the existing street in Clonminch Woods should there be any need for them to be joined in the future once taken in charge. As illustrate by the Nodal Masterplan drawing submitted with this application, Green Street West has been positioned so that it could be joined to the existing green space in Clonminch Woods in the future once taken in charge. This would provide the residents of Clonminch Woods with a much more usable area of public open space.

1.1.3 RECOMMENDED REASONS FOR REFUSAL AND BOARD DIRECTION

The Inspector in the case of ABP-307832 recommended five reasons for refusal. The Board Direction for this case provides reasons for not accepting three of the Inspector's reasons for refusal.

Board Direction - Note 2 states:

The Board did not accept the Inspectors recommendation to refuse permission for the recommended reasons set out in 1 & 2 of the report. The Board noted that the proposed development includes lands identified as Phase 3 residential lands but noted that the plan allowed for flexibility and was satisfied that it would not contravene the provisions of the core strategy and would not materially contravene the development plan.

Furthermore, the Board was satisfied that the submitted statement of Material Contravention was sufficiently detailed to allow the Board to rely upon it had it decided to grant permission.

The proposed SHD maintains the application site boundary of ABP-307832 which extends into phase 3 lands in acknowledgement of the Board Direction and to complete development of the landholding south of the Link Street. Detailed justification was provided for the inclusion of the phase 3 lands as part of the Nodal Masterplan for the Eastern Node relating to urban design principles and achieving a successful and attractive neighbourhood. Notwithstanding the statement of An Bord Pleanála at Note 2, a statement of material contravention has been prepared to accompany this planning application under separate cover. The statement of material contravention addresses the how the proposed development is justified under the specific criteria contained at section 37(2)(b) of the Planning and Development Act (as amended) allowing section 9(6) (c) of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) to be invoked in this case.

Board Direction - Note 1 addresses recommended reason no.5 stating:

The proposed development provides for interim arrangements to address existing constraints on the wastewater sewerage network serving these lands, including the temporary on-site storage of wastewater. Having regard to the substantive reasons for refusal above, the Board considers that the matter of temporary stage will not arise given the projected timelines for the delivery of new municipal facilities in Tullamore.

Confirmation of feasibility for the proposed development has been issued by Irish Water (letter dated 01-09-21). It is submitted that Irish Water are confident that servicing of the proposed development can be achieved and that the interim measures are appropriate.

An appropriate assessment screening report and Natura Impact Statement has been prepared by Doherty Environmental and accompanies this planning application under separate cover. This assessment includes any potential impact on European sites as a result of the proposed interim measures.

2.0 DESCRIPTION OF SITE AND PROPOSED DEVELOPMENT

2.1 SITE CONTEXT

The application site is located to the south east of Tullamore Town Centre to the east of the Clonminch Road (R443). The immediate area is characterised by linear residential development along the Clonminch Road with low density housing developments to the east of Clonminch Road including Limefield and Clonminch Wood. A Part 8 housing development has approval on lands to the immediate north of the application site entrance which has been designed for housing the elderly. Opposite the site entrance is a large and imposing commercial building of modern design which acts as a gateway building on entrance to Tullamore from the south via the N52 junction to the south of the application site. Developments to the west of the Clonminch Road behind residential dwellings fronting onto the R443 consist of employment uses within the Central Business Park where the Department of Education and Skills, Department of Agriculture, Food and Marine and Revenue Irish Tax and Customs offices are located together with the Department of Finance offices in addition to Teagasc. This is a significant centre of employment for Tullamore.

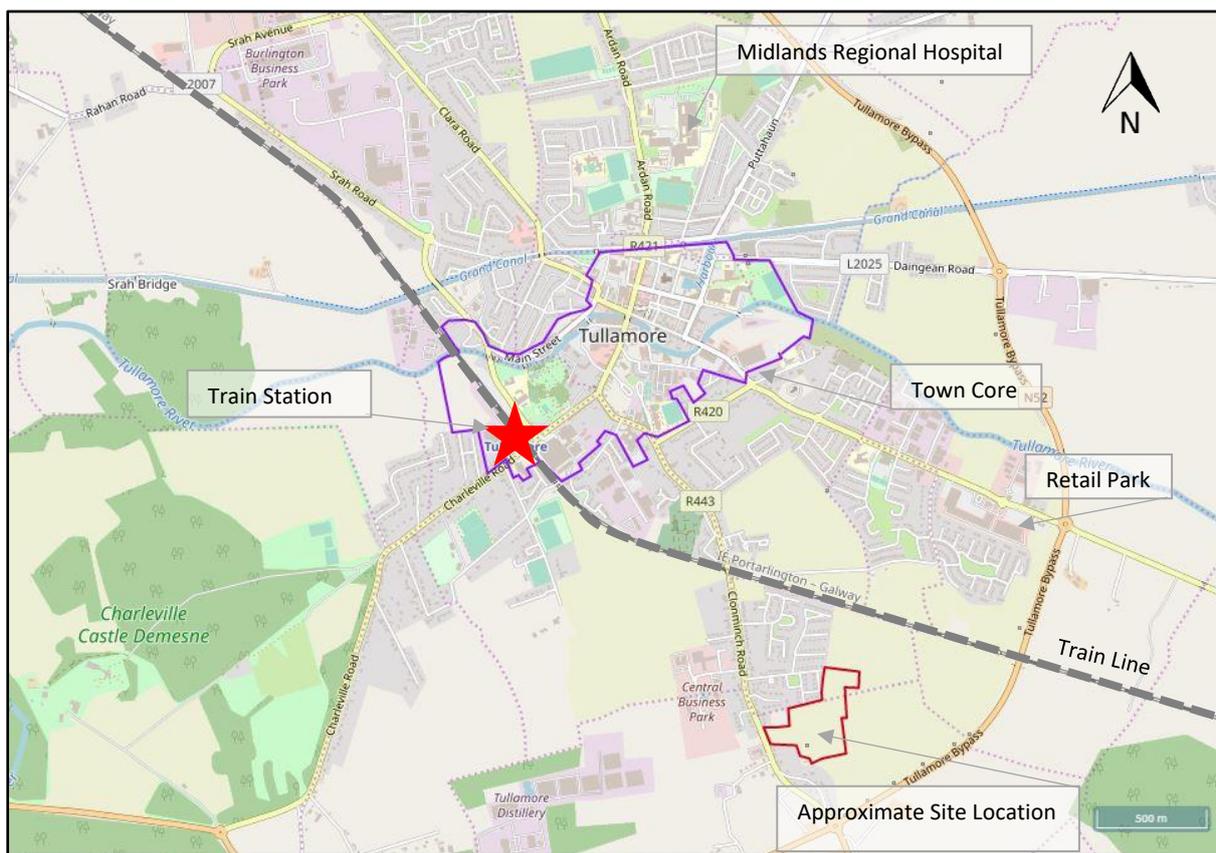
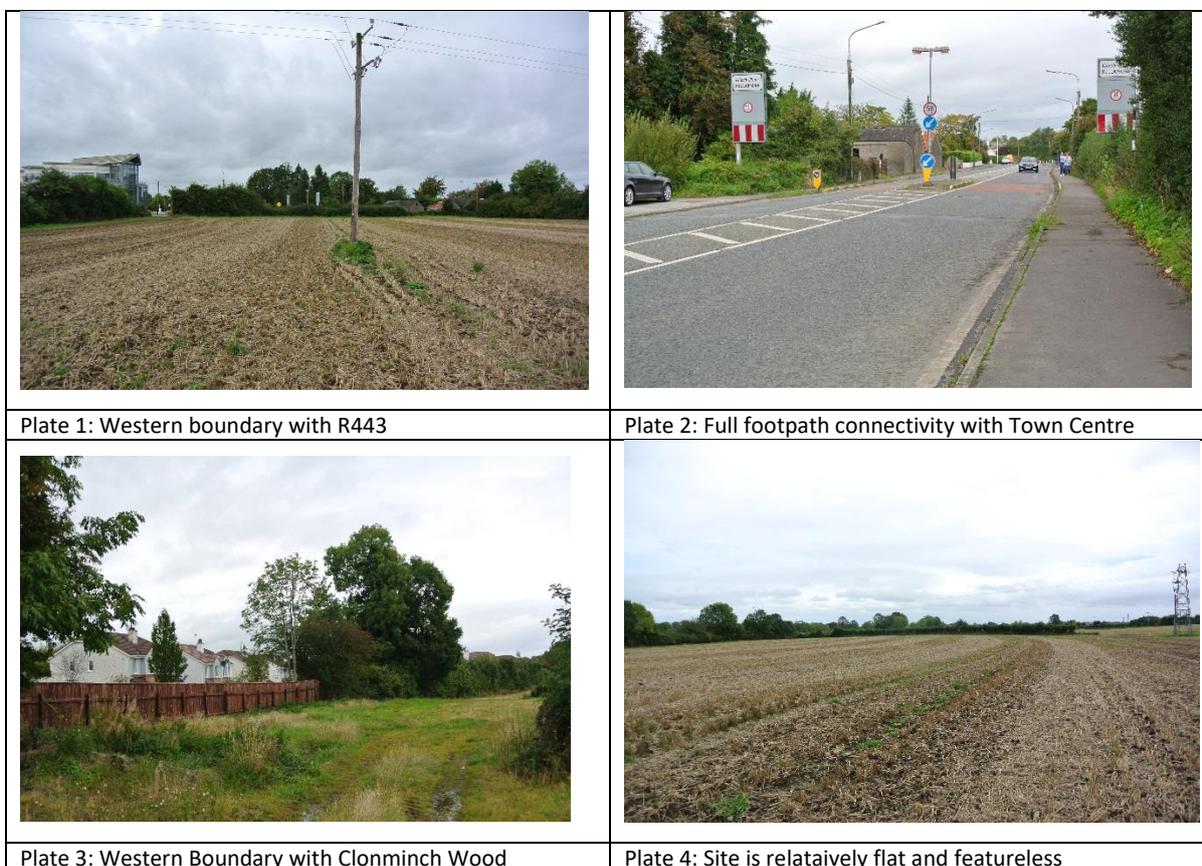


Figure 2.1: Site Context

The wider area within which the application site is located is characterised and largely defined by infrastructure routes with the Dublin-Galway train line to the north and N52 orbital route forming a physical barrier surrounding the settlement of Tullamore and marking a transition to more rural landscape beyond. There is full footpath connectivity from the application site into Tullamore Town Centre and a regular bus service (835) provides easy access to services in the town including the train station and retail services to the east. Currently on the Clonminch Road cyclists must share the road with vehicular traffic. The Clonminch Road has been assessed by DBFL Consulting Engineers and is of sufficient width to accommodate segregated cycle tracks from the site to the Town Centre through the revision of road markings. Further detail is provided at Section 2.3.9 below and the Traffic and Transport Assessment undertaken by DBFL under separate cover. The undertaking of these works is included as part of the proposed Strategic Housing Development and the necessary letter of consent from Offaly County Council is provided. All works will be carried out within the existing public highway and do not involve third party lands.



The net development area site extends to 11.45 hectares and consists of agricultural fields and associated field boundaries with an existing agricultural entrance onto Clonminch Road (R443). There is an agricultural laneway to the south serving agricultural buildings which is not part of this application. The landscape is relatively flat and featureless with a number of ESB cables traversing the site. Boundaries to the south consist of field hedgerows and rear gardens of housing fronting onto Clonminch Road. The western boundary adjoins the existing residential developments fronting Clonminch Road, Clonminch Wood and Limefield with boundary treatment mainly consisting of wooden garden fences and hedges. The northern and western site boundaries

do not have a definite physical boundary but extend into agricultural lands before meeting with the Dublin-Galway train line to the north and N52 orbital route to the west.

2.1.1.1 ARCHAEOLOGY

The application site is not located in a National Monuments Service Zone of Notification nor does it contain any recorded monuments.

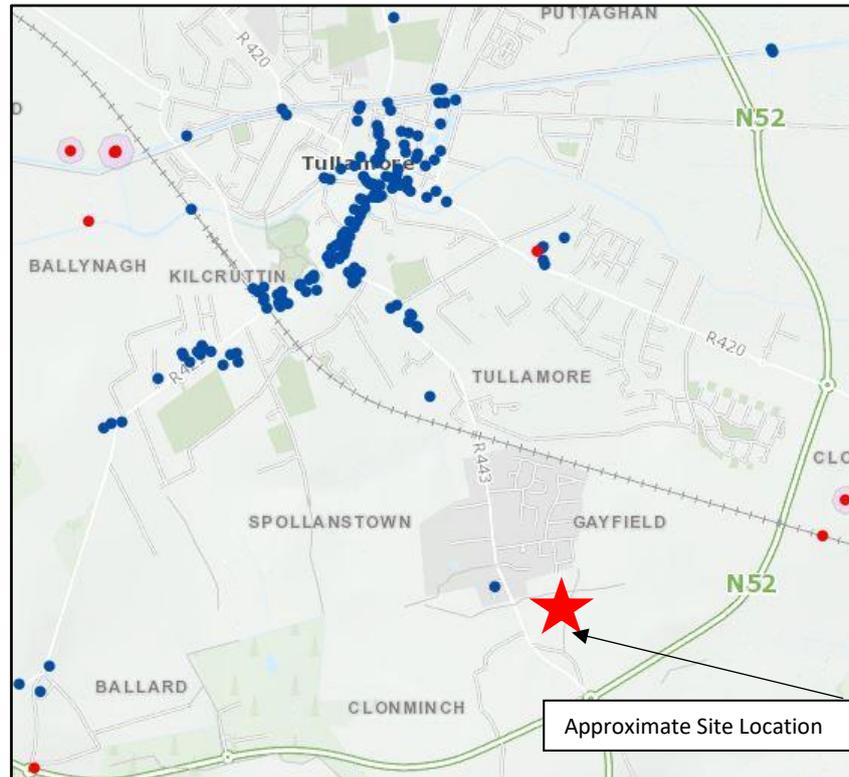


Figure 2.2: Historic Environment Viewer with approximate site location

Notwithstanding the above a desktop archaeological assessment was carried out by Archer Heritage Planning followed by geophysical testing and test trenching under licence during 2019 and 2020. A submission by the Department of Culture, Heritage and the Gaeltacht dated 10th of September 2020 in relation to ABP-307832 acknowledges these reports and testing undertaken in which two fulacht fia were discovered. It is recommended that excavation be undertaken under licence and that groundworks across the remainder of the site be monitored by a suitably qualified archaeologist.

2.1.2 ENVIRONMENTAL DESIGNATIONS AND PROTECTED AREAS

A screening report for Appropriate Assessment was prepared by Mr. P.Doherty of Doherty Environmental. This report identified a hydrological pathway linking the application site to the Charleville Wood SAC and considers that the potential for likely significant effects to European Sites cannot be ruled out at the screening stage and that an Appropriate Assessment of the project is required. Based on this conclusion a Natura Impact Statement has been prepared to accompany this planning application to inform An Bord Pleanála during its AA of the project.

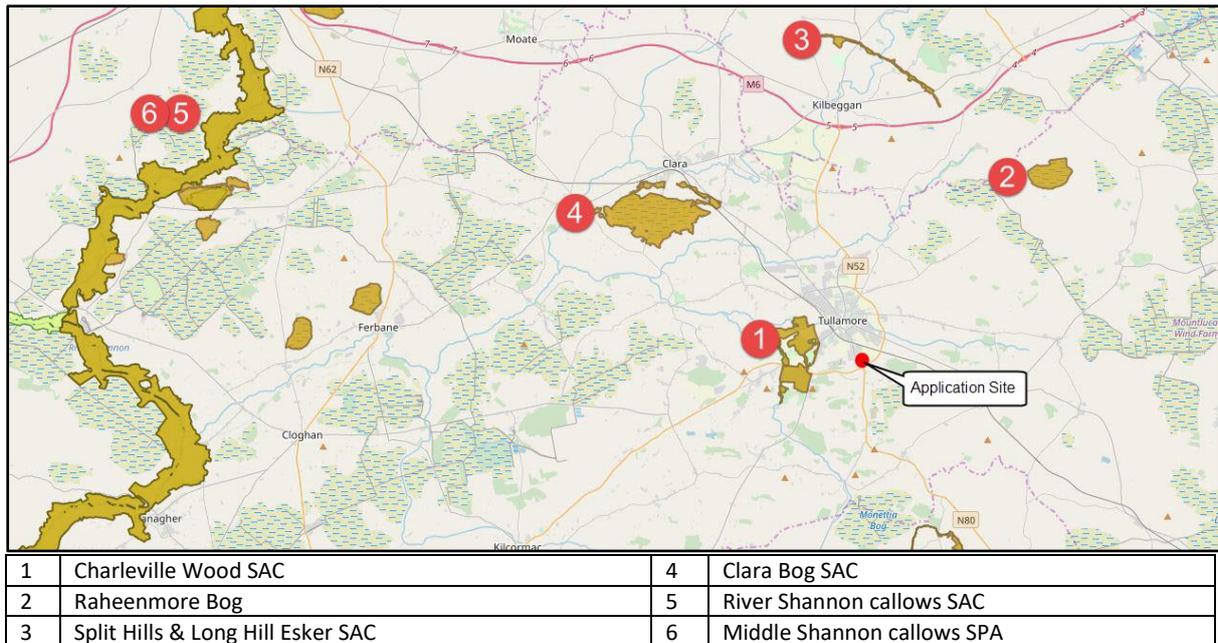


Figure 2.3: Natura Network in proximity to the application site
(Please refer to Screening Report and NIS under separate cover for detailed assessment)

2.1.3 PROXIMITY TO A LOWER TIER COMAH ESTABLISHMENT

At its closest point, the application site is 490 metres north east of the William Grant & Sons Whiskey Distillery and warehouse maturation facility. This is a Lower Tier COMAH establishment. A Land Use Planning Assessment was completed for SHD Ref. ABP307832-20 by AWN Consulting in accordance with guidance published by the Health and Safety Authority. The records for this facility were reviewed by AWN Consulting in January 2021. There have been no changes to the inventory at William Grant & Sons and the application site boundary has not changed. Therefore the outcome of this report remains the same. The major accident scenarios assessed have no expected impact on the proposed development.



Figure 2.4: Site location in relation to William Grant & Sons Whiskey Distillery

2.2 SOCIAL INFRASTRUCTURE AUDIT

2.2.1 COMMUNITY SERVICES AND FACILITIES

In keeping with the policy of the Offaly County Development Plan 2014-2020 (para. 6.20) and in the interest of sustainable and orderly development, an audit of existing community facilities in the locality has been undertaken.

The OCDP recognises the term ‘community services’ potentially covers a very broad range of infrastructure and service provision to meet the needs of residents within the Planning Authority’s area (para. 6.2). The emphasis in the Planning and Development Act, 2000 (as amended), is placed on childcare and educational facilities, including the services such as pre-schools, Naionraí (Irish language playgroups), day-care services, crèches, Montessori schools, playgroups, childminding, after-school groups, primary, secondary and special needs schools. Other community facilities mentioned by the OCDP include “*places of worship, burial grounds, hospital and health centres, facilities for the elderly and persons with disabilities, libraries and community halls*”.

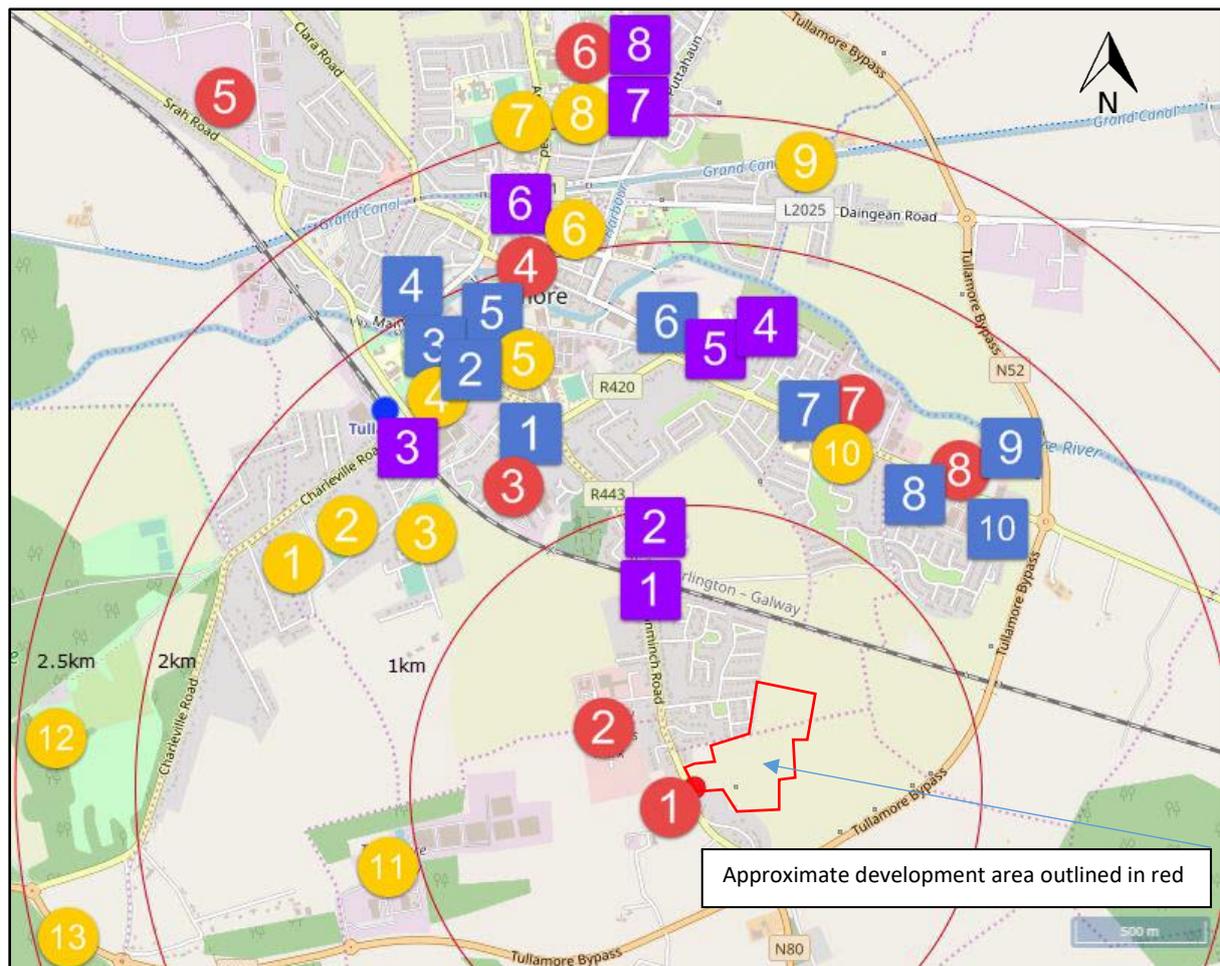


Figure 2.5: Community Audit

Retail and Services			
1	Tullamore Court Hotel	8	Tullamore Retail Park- <ul style="list-style-type: none"> ▫ Woodies ▫ EZ Living Furniture ▫ Argos ▫ Sports Direct/Heatons ▫ DID Electrical ▫ Harry Corry
2	The Bridge Centre		
3	Central Hotel		
4	Lidl	9	Riverview Commercial Park <ul style="list-style-type: none"> ▫ Costa Coffee ▫ Aldi ▫ Dealz ▫ NCT Centre
5	Bridge House Hotel		
6	Dunnes Stores		
7	Spar		
		10	Tesco Extra
Enterprise and Employment			
1	Clonminch House- <ul style="list-style-type: none"> ▫ Ace Braces ▫ BCA Accounting ▫ Townmore Construction 	5	Srah (IDA) Industrial Estate- <ul style="list-style-type: none"> ▫ Zoeties ▫ Kelpac Medical ▫ Synergy Health Ireland ▫ Integra Lime Sciences ▫ Cardinal Health Work ▫ ACETECH Solutions (ATSR Ltd) ▫ Sigmoid Pharma

Enterprise and Employment continued			
2.	Central Business Park- <ul style="list-style-type: none"> ▫ Kenny Lyons + Associates ▫ Department of Education & Skills ▫ Department of Agriculture & Food ▫ Department of Finance 	6	Midlands Regional Hospital
3	Spollenstown Industrial Estate	7	Cloncollig Industrial Estate
4	Town Centre with associated offices, retail and service industry employment.	8	Tullamore Retail Park
Sports, Recreation and Leisure			
1	Tullamore Harriers Athletics	8	O'ConnorPark
2	Astroturf Pitches	9	Grand Canal Walk
3	Tullamore Rugby Club	10	Aura Tullamore Leisure Centre&Tennis
4	Lloyd Town Park	11	Tullamore Dew Visitors Centre
5	IMC Cinema	12	Charville Forest & Castle
6	Library	13	Tullamore Golf Club
7	Tullamore GAA		
Community/Health Services			
1	Community Pharmacy	5	Charville Community Centre
2	Offaly Centre for Independent Living	6	HSE Community Health Centre
3	Offlay County Council	7	The Health Centre
4	Tullamore Primary Care Centre	8	Midland Regional Hospital Tullamore
T	Transport – Train Station and Bus Station		

Table 2.1: Community Audit

The proposed development is well catered for with shopping, sports and health facilities within a 2.5km radius.

2.2.2 SCHOOLS AND CHILDCARE

An audit of existing childcare facilities and schools has been undertaken and illustrated by figure 2.6 below. Information was obtained from Pobal and Tulsa online services as well as the Department of Education and Skills online data. A school demand and concentration report has been prepared and is submitted under separate cover. A childcare facility is provided as part of the proposed development that can cater for approximately 100no. children with dedicated car parking, drop off area and outside play space. The location of this play space has been assessed as part of the EIAR in terms of potential noise to neighbouring dwellings and positioned accordingly.

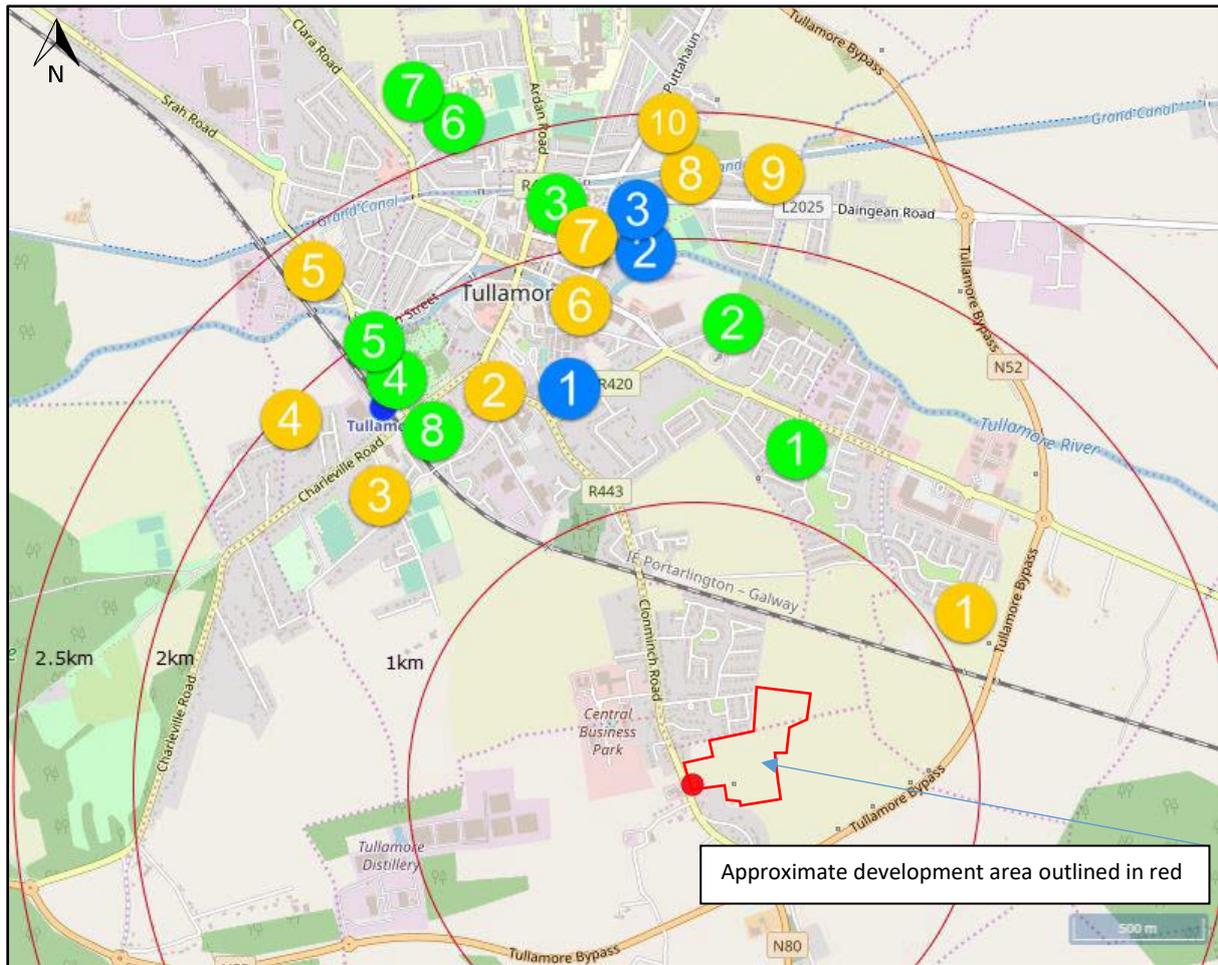


Figure 2.6: Schools and Preschools in Tullamore

Primary Schools Enrolment (2020-2021)				Secondary Schools Enrolment (2020-2021)			
No.	School	Boys	Girls	No.	School	Boys	Girls
1	Gaelscoil an Eiscir Riada	99	113	1	Colaiste Choilm	619	N/A
2	Charleville National School	50	50	2	Tullamore College	296	384
3	St. Philomena’s National School	N/A	178	3	Sacred Heart Secondary School	N/A	543
4	Scoil Mhuire	80	220				
5	Scoil Bhríde	155	N/A				
6	St. Joseph’s National School	222	177				
7	Arden Boys	202	N/A				
	Sub-Total	808	738		Sub-Total	915	927
8	Offaly School of Special Education		34				
	Total		1,580		Total		1,842
Childcare Facilities							
No.	Facility	Capacity	No.	Facility	Capacity		
1	Little Caterpillars	22	6	ABC Nursery & Playschool	32		
2	Early Years Childcare	27	7	Naíonra Gaelach An Tulach Mhór	24		
3	A Little Treasures Montessori Preschool	22	8	Re Scoil Isoagain	22		
4	Little Acorns Pre-School	28	9	Happy Hours	31		
5	Castlevieview Pre-School	10	10	Little Trinity Montessori	52		
				Total	270		

Table 2.2: Audit of Schools and Childcare



Figure 2.7: Application site in relation to reserved school site within the Eastern Node

A Nodal Masterplan for the Eastern Node of the Southern Environs Masterplan area accompanied the planning application assessed under ABP-307832-20. The nodal masterplan layout drawing has been amended following the decision of An Bord Pleanála to illustrate how the realignment of the link street has been incorporated into the Eastern Node as a whole. The principles on which the Nodal Masterplan was prepared remain and the school site is in the same location within the Eastern Node. The layout of the school site has been amended to provide direct access to the site from the Link Street. Figure 2.7 illustrates the position of the school site in relation to the proposed SHD. As part of the preparation process for the Nodal Masterplan for the Eastern the Department of Education were contacted for their opinion on the selected school site and for information relating to its future need. By correspondence dated 18th of June 2020 the Department confirms that they do not require a school in this area at present but requests the site is reserved. The changes proposed to the SHD site under the subject planning application do not affect the reserved school site in terms of its size or position within the Eastern Node. The Department has confirms the proposed site is deemed sufficient for a 16-24 room primary school (see Nodal Masterplan under separate cover).

2.3 THE PROPOSED DEVELOPMENT

The proposed development is of a residential nature with supporting neighbourhood services comprising:

- 196 houses
- 153 apartments
- 4,362m² of neighbourhood and employment floor space (e.g. local shops, business hub, medical centre and crèche)

2.3.1 CALCULATION OF SITE AREA AND RESIDENTIAL DENSITY

The application site measures 14.28 hectares. The net development area measures 11.45 hectares. Figure 2.8 below illustrates the areas excluded from the gross site area which correspond with-

- Proposed works on the Clonminch Road to facilitate segregated cycle tracks from the application site to the Town Centre (2.83ha) (coloured purple).
- The additional area of land required for services (pipes/pumping station) running north of the development area (0.73ha) (coloured green).

The net development area can be further broken down between the zoning objectives that apply under the Tullamore Town and Environs Development Plan 2010-2016 (as varied and extended) and land-use proposed.

- 10.07hectares is 'Residential Use' (coloured orange).
- 0.65 hectares is part of the 'Neighbourhood Centre' (coloured yellow).

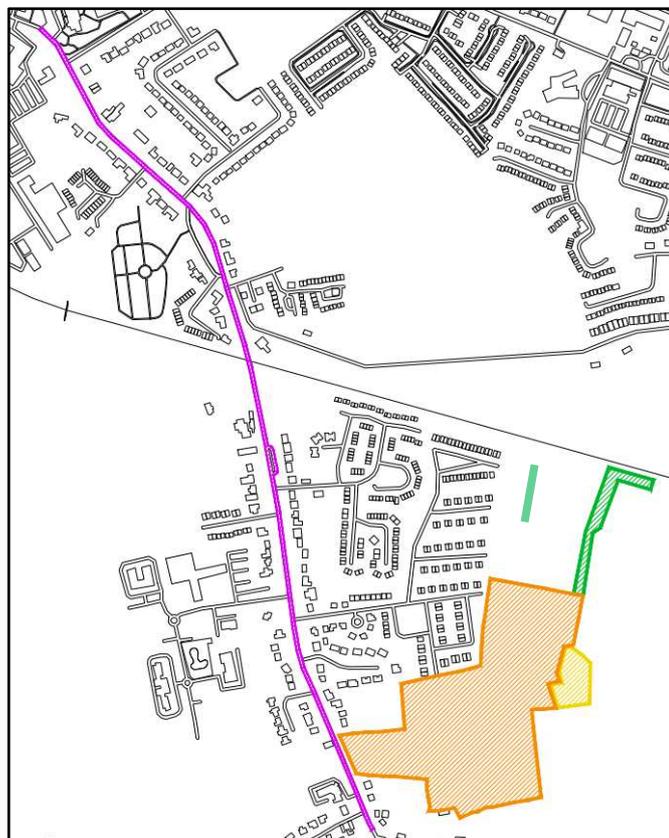


Figure2.8: Breakdown of application site areas

2.3.2 DESCRIPTION OF DEVELOPMENT

The proposed development has a combined gross floor area (GFA) of 40,015.70m² over a development area of 11.45hectares. The total number of 349no. dwellings (35,653.70sq.m) will be provided across 10.07 hectares of the net development area at a density of 35 dwellings per hectare. The two neighbourhood centre buildings (3,007sq.m) will be provided on lands zoned Neighbourhood Centre which extend to c.0.65hectares within the application site. The local shop in Block F (56sq.m) and crèche (1,299sq.m) are on lands zoned Residential which provided for these land uses. The project has been designed as a new urban neighbourhood within a parkland setting and adheres to the principles of the Urban Design Manual. The DMURS compliant road hierarchy and generous public open space areas will create a calm and pleasant environment. High quality materials and finishes are proposed through the scheme as detailed in the Architects Design Statement under separate cover.

Proposed buildings on the site will range between 1 – 4 storeys in height. Neighbourhood uses are contained in 2no. three storey buildings. Neighbourhood centre building no.1 (1,274sq.m) provides for three local shops at ground floor level with the first and second floor proposed as a business hub. Neighbourhood centre building no.2 (1,733sq.m) sq.m is divided into four shops and a medical centre at ground floor level. The medical centre extends into the first floor while the second floor is proposed as a gym. The crèche is a stand-alone three storey building with outdoor play area and dedicated set down/parking area.

All buildings will have provision for photovoltaic/solar panels. The final position of these panels will depend on orientation. Parking to serve the proposed development is provided in-curtilage and at surface level for housing and a mix of basement and surface level parking for apartments. Where on street car parking is provided it is softened with landscaping to reduce its visual impact. Parking courtyards are also proposed to take cars 'off-street'. Dedicated car parking is provided for the neighbourhood centre and crèche and is located so it is not visually intrusive. Bicycle parking spaces are proposed across the site at surface level with addition bicycle storage rooms in the basement of apartment buildings B and G.

Public open spaces will be provided throughout the development including two large public parks named Clonminch Square and St.Columba's Green and two smaller parks named Green Street West and Green Park in addition to a tree lined cycle path through the site. Green Street West offers the opportunity to join the new neighbourhood with open space within the existing development of Clonminch Wood in the future. It is envisaged that the civic square proposed will relate closely to the Neighbourhood Centre buildings creating a focal point as residents enter the commercial core of the Eastern Node.

2.3.3 RESIDENTIAL ACCOMMODATION

The proposed dwelling types have been designed by a team of qualified and experienced architects with an emphasis on variety and the creation of attractive and pedestrian friendly streetscapes. At all times the proposed development has regard for and references the Nodal Masterplan for the Eastern Node to ensure consistency with the principles and vision set out in the nodal masterplan, the interface with neighbouring lands and the delivery of the specific objectives contained in Chapter 5 of the Tullamore Town and Environs Development Plan 2010-2016 (as varied and extended).

The proposed development provides a mix of dwelling types to include detached, semi-detached and terraced dwellings and 153 apartments. This mix avoids the creation of a homogenous residential development. Rather the mix enables the creation of a more diverse population profile that assists the development of an integrated community. Households can move within the development as families expand and contract.

The breakdown across the 349no units is-

Proposed Mix of Residential Units		
1-Bed	41	12%
2-Bed	103	30%
3-Bed	155	44%
4-bed	50	14%
<i>Total</i>	349	100%

Table 2.3: Proposed Development – Mix of Dwelling Size

Unit Type	Number of Units	Percentage of Development	
Apartments	153	44%	
Detached House	5	1%	56%
Semi-Detached House	48	14%	
Terrace Houses	143	41%	
<i>Total</i>	349	100%	

Table 2.4: Breakdown of Residential Accommodation Type

Phase One	Phase 2	Total
114no. dwellings	82no. dwellings	196no. dwellings
124no. apartments	29no. apartments	153no. apartments
238no units	111no. units	349no. units

Table 2.5: Phased delivery of residential units

2.3.3.1 HOUSING

The proposed site layout provides a perimeter of two and three storey houses along the boundaries of the residential area respectful of existing adjoining residential development and providing the first element of the new urban structure. The central layout is focused on the creation of a strong urban street along the Link Street with a sense of enclosure. The majority of housing along the Link Street is three storey in height with interest added by alternating height, design and roofscape. Detached house types D1 and D2 are single storey and have been designed to respond to the pedestrian links in these locations. All detached, terraced and semi-detached housing have rear gardens for private amenity use.

As illustrated by architect drawing no. 1757-PA-008 there are a variety of house designs proposed. In addition to the various unit types and finishes, house types vary in height to increase variety and provide a strong urban edge and orientation within the development. The housing mix is as follows-

House Size	Number Proposed
2-bedroom	4
3-Bedroom	142
4-bedroom	50
Total	196

Table 2.6: Housing Mix



Figure 2.9: Block 7 4-bed semi

Figure 2.10: Block 7.4 4-bed semi



Figure 2.11: Extract from Crofton Avenue Street Elevation



Figure 2.12: Block 12- Designed as three storey fronting Crofton Avenue and two storey to rear in acknowledgement of lower density development to the west.

2.3.3.2 APARTMENTS

Details of apartments are provided in the Architects Schedule that accompanies the application package. Considered separately from the housing, apartments within the proposed development have an overall mix as follows-

Apartment type	Number proposed	% of total
1-Bed	41	27%
2-Bed	99	65%
3-Bed	13	8%
Total	153	100%

Table 2.7: Apartment Mix

Building Block A and C at the entrance to the application site signal the entrance to the Eastern Node so have been designed to acknowledge this position. At the same time, the proposed height of two storeys with a pop up to three storeys on the corner at the road junction respects the existing low density development along the east of Clonminch Road north and south of the site entrance. Parking is provided to the rear of these buildings so will not dominate the streetscape. Communal open space is located to the rear and the south of Block A (total 125sq.m) and to the rear of Block C (146sq.m) which has a favourable orientation.

Apartment building B is located to the north of one of the main public open space areas that has been named Clonminch Square. Building B is three to four storeys high. Communal open space (202sq.m) is provided to the south of Building B taking advantage of the southern orientation with views to Clonminch Square. The position and function of Building B is reflected on the opposite site of the Link Street further east by apartment building G, also three and four storeys high. Building G is located to the south of St.Columba's Green and designed to address the link street providing a strong urban edge announcing the entrance to the commercial core while providing glimpsed views of St.Cloumbas Green. Communal open space (293sq.m) is provided to the south west for occupants of Building G with the public square located to the east of this building. Both building B and G have basement car parking.

Apartment Building F is three storey high and located at the north east corner of Clonminch Square, east of building B. Communal open space is provided to the rear of the building which has a southern orientation (101sq.m). The crèche building is three storey located at the north west corner of Clonminch Square and to the west of Building B. Together they form a strong urban edge to the south of the link street.

Building D is located to the north of the application site where the site meets with Clonminch Wood. The provision of an apartment building in this location allows two large public open spaces– Green Street West and St.Columba's Green, to be properly addressed, enclosed and supervised. Building D is three storey in height with the third storey set back from the main building line and orientated to maximise the number of east west facing apartments. The provision of a basement car park for Building D prevents car parking and roads dominating this space and interrupting the relationship between the two areas of public open space. Communal open space to the east of Building D (185sq.m) take advantage of views onto St.Columba's Green.



Figure 2.13: View east along link street with Building B marking the transition from the entrance area to Clonminch Square to the south and more local roads and traditional housing to the north of the link street.



Figure 2.14: Building B and the crèche building provide a strong urban edge with glimpsed views beyond to Clonminch Square.

Building E is located to the east of Building D and provides the eastern edge to St.Columba's Green. This building is taller at four storeys with basement car parking. Communal open space is to the west overlooking St.Columba's Green (331sq.m) In keeping with future plans for the Eastern Node, this building will address the commercial core and school site and the increased height reflects this transition. The additional height is also required to enclose St. Columba's Green.



Figure 2.15: Building E (left of image) and Building D (right of image) addressing St. Columba's Green

All apartments have their own area of private amenity space either as a ground floor terrace or balconies in the case of upper floors. As illustrated by figure 2.16 below, terraces and balconies are designed to be partially within the building envelope to provide shelter but extend beyond the building to ensure a good level of sunlight for residents. All private open space areas are accessed directly from the main living areas. As illustrated by figure 2.16, there is a clear distinction made between private, communal and public open space areas with buffer planting and appropriate boundary treatments protecting privacy of residents and distancing the apartments from public circulation routes and public open space. All communal and public amenity areas have been designed by qualified and experienced landscape architects Park Hood.

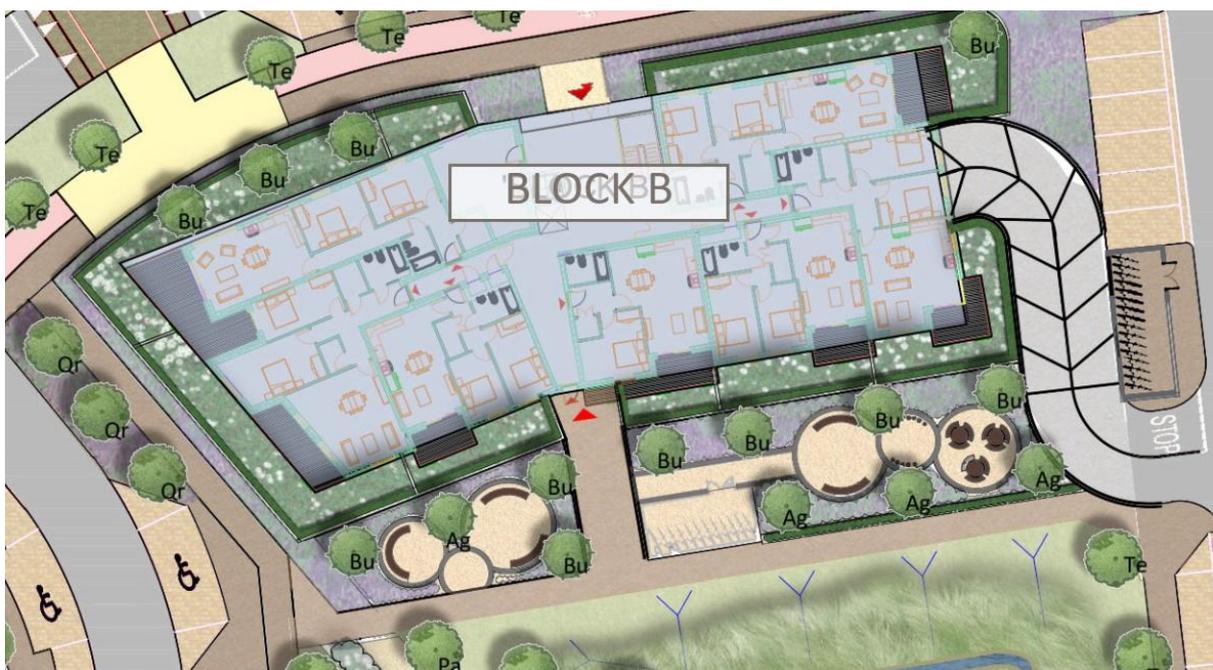


Figure 2.16: Extract from Park Hood Landscape Plan (drawing no. 6473-L-304)

2.3.4 UNIVERSAL DESIGN

The Design Team are very much aware of the importance of integrating the principles of Universal Design into new residential development. Apartments offer single level living with lift access to all floors. Single storey detached housing is also provided. All buildings are compliant with the requirements of Part M. The houses proposed have generous ground floor living areas which could accommodate a bed and all have a WC at ground floor level.

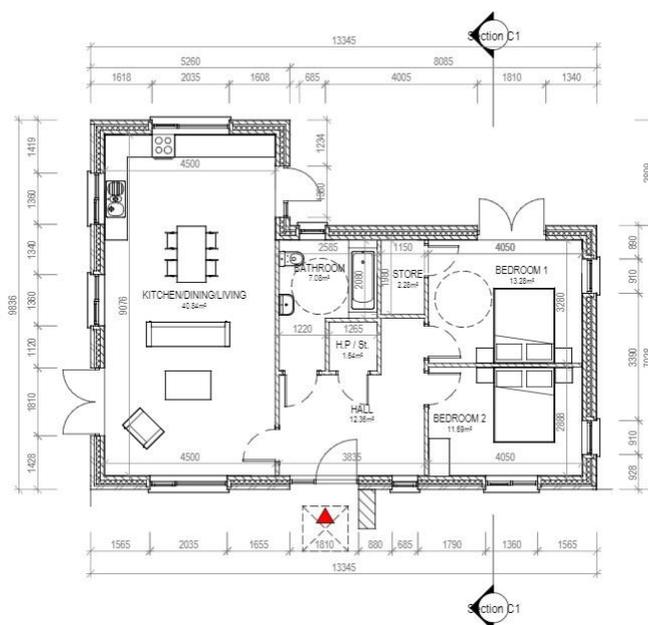


Figure 2.17: Floor plan of house type D2 showing wheelchair turning circles and wide circulation areas

2.3.5 PUBLIC OPEN SPACE

The site layout features a high level of public open spaces as illustrated by figure 2.18 which includes tree lined cycle paths, hard surfaced urban spaces and large public parks. Play areas are provided at three locations within the development. Public open space areas as detailed in Table 2.8 below amount to 16,207m² or 16% of the net residential area and 15% of the net development area which includes the neighbourhood centre.

All public open spaces have been designed by an appropriately qualified and experienced landscape architect as an integral part of the site layout. A Landscape Rationale by Landscape Architects Park Hood accompanies this request under separate cover which includes the detailed design rationale behind the creation of each of the primary open spaces as well as detailed design elements such as car parking and bin storage areas.



Figure 2.18: Extract from the Landscape Masterplan by Park Hood

The provision of artwork at key vistas within the new neighbourhood is an important feature of the landscape strategy. This will help provide the development with an identity and help orientate people within the neighbourhood. The design of the public parks takes full account of the above ground attenuation areas proposed. The following table reflects the open space as illustrated on architect drawing no. 1757-PA-007.

Name/Character area	Features and Function	Size
Clonminch Square	Children's Playground and seating areas	4,131m ²
St. Columba's Green	Civic Plaza with spill out area for neighbourhood uses. Natural Play area and formal lawn areas enclosed as quiet space with seating. Informal Kick about.	7,035m ²
Green Street West	Seating and amenity area with informal natural play elements. This area adjoins Clonminch Wood and has been located to allow the existing area of public open space to the west to be knitted into the new neighbourhood centre in the future once Clonminch Wood is taken in charge.	2,496m ²
Green Park		1,415m ²

Public Square Neighbourhood Centre		1,130m ²
Sub-total	16,207m²/16% residential site area <i>This figure does not include incidental green space.</i>	

Table 2.8 – Breakdown of Public Open Space

2.3.6 NEIGHBOURHOOD BUILDINGS

The first two buildings of what will become the neighbourhood centre within the Eastern Node are provided as part of the proposed SHD. The buildings are three storey in height and positioned either side of the Link Street clearly defining the entrance into commercial core with the school site located to the north with direct access from the Link Street. The building to the south of the link street (NC2) has a floor area of 1,733sq.m and is designed to provide a medical centre at ground and first floor with a gym at second floor level. Four ground floor retail units provide opportunity to cater for neighbourhood uses like cafes, local shops and a post office or hairdresser which will create activity at ground floor level. Car parking is accessible from the link street and located to the rear of the building to ensure a strong urban frontage and reduce the visual impact of surface car parking. The building to the north of the link street (NC1) measures 1,274sq.m and has been divided into three units at ground floor level with a business hub above. It is submitted that locally accessible business solutions are increasingly important with more people working from home. It also allows for small business start-ups to share a space. There is delivery access only to the rear of this building using a one way system. Parking is provided on street and includes an allocation in the car park to the rear of NC2.

In order to ensure the new neighbourhood is self-sustaining from the earliest phase, provision is made for a local shop (56sq.m) at ground floor level of Block F at the north east corner of Clonminch Square with frontage onto the link street.

2.3.7 CHILDCARE FACILITY

The crèche building (1,299m²) is three storey and of modern design located to the north west corner of Clonminch Square situated directly off the link street and will be clearly identifiable on entrance to the Neighbourhood. The internal layout has been designed to cater for approximately 100 children. The crèche has 21no. car parking spaces allocated. Outside play space is provided to the rear of the crèche which has a favourable western orientation. Bin storage and cycle parking locations are illustrated on architect drawing no. 1757-PA-007.

2.3.7.1 POTENTIAL DEMAND GENERATED FOR CHILDCARE

Based on the projected population of 942 that will reside within the completed development², it is estimated that 7% of the population equating to 57no. children will be of pre-school age. Based on the most recent available data, it is estimated that 19% of these children will be cared for in a childcare facility such as a crèche. This would generate a need for 11 childcare places.

As illustrated by figure 2.6 and Table 2.2 of this Statement, there is capacity for 270 childcare places within 2.5km of the application site. However, geographically the south of Tullamore is not well catered for by childcare facilities. It is proposed to provide a childcare facility as part of the proposed development that will cater for future residents in accordance with the Childcare Facilities Guidelines. Using the benchmark of one childcare facility for 75 units, the proposed development of 349units requires a childcare facility with the capacity for c.100 children.



Figure 2.19: CGI Crèche Building

2.3.8 PARKING

A detailed analysis of car parking and cycle parking and storage is provided within the Traffic and Transport Assessment by DBFL Consulting Engineers under separate cover. A total of 586o. car parking spaces are provided to serve the 349no. dwellings. 25% of car parking provided for residents is at basement level with a further 47% of car parking provided in curtilage. The provision of parking courtyards further reduce the visual impact of car parking taking cars 'off street'. Where surface car parking is proposed it is in close proximity to the main entrance to dwellings and well supervised.

A further 109no. car parking spaces are provided to serve the crèche (21no car parking spaces for staff and a drop off area), the neighbourhood centre buildings and local shop.

² 2.7 household size based on Census 2016 Settlement of Tullamore

	Residential	Non-residential
Basement	148	-
In-curtilage	278	54 (rear NC2)
On street	160	55
734	586	109

Table 2.9 – Car Parking provision

Cycle parking is provided throughout the site as illustrated by architect drawing 1757-PA-007. A total of 315no. cycle parking spaces are provided at surface level and at basement floor level within apartment buildings B and G.

2.9.9 PROVISION FOR BUS SERVICES

The Link Street that runs through the centre of the development can facilitate a public bus service with bus stops provided for at the neighbourhood centre. Bus stops are also proposed on the Clonminch Road.

2.3.10 CLONMINCH ROAD CYCLE SCHEME

Improvement works are proposed to Clonminch Road over a length of c.1,700m to allow for comprise predominantly off-road cycle tracks to be incorporated onto the existing carriageway. For a short 90m section south of the Bachelor's Walk junction, the narrow carriageway width at this section results in southbound cyclist having to share the road with vehicular traffic. The cycle scheme is fully in keeping with the National Cycle Manual. The proposed cycle scheme will commence approximately 100 metres south of the proposed site access junction and continue along Clonminch Road to tie into the existing road carriageway at a location approximately 80metre northwest of the Bachelor's Walk junction. In order to facilitate the proposed segregated cycle tracks all space facilitating the existing right turn pockets have been reassigned to introduce the cycle facilities. Vehicular traffic lanes have been designed to a standard width of 3 metres in each direction. Offaly County Council who have provided a letter of consent for the inclusion of the lands required to provide the cycle facilities.

The proposed improvement works to provide cycle tracks on Clonminch Road are illustrated by DBFL Consulting Engineers Drawings 180002-DBFL-RD-SP-DR-C-1009 to 180002-DBFL-RD-SP-DR-C-1013.

2.3.10 PUMPING STATION AND GROUNDWORKS

Infrastructure proposed as part of the development includes a pumping station within the northern part of the application site and rising main. The pumping station is required due to the topography of the site and will pump foul water to the existing foul network on Clonminch Road. The Tullamore Waste Water Treatment Plant has adequate capacity to cater for the proposed development and Irish Water have issued confirmation of feasibility confirmed feasibility. For further detail please refer to Infrastructure Design Report by DBFL Consulting Engineers under separate cover.

The development includes the undergrounding of ESB lines that currently traverse the site and all associate site development works with the provision of the development outlined above.

2.4 PHASING

It is proposed to complete the 349no. dwellings, neighbourhood uses and childcare facility in two phases. Both phases of development include a variety of dwellings types, including apartments.

Development Phase	Residential Development		Density	Public Open Space	Non-residential floor space	Clonminch Cycle Scheme	Part V (proposed)		
Phase 1	238	Houses	114	34/ha	12,076m ² (86%)	NC1 1,274m ² Crèche 1,299m ²	c.1,700m Completed	12no. houses	24
		Apartments	124					12no. apartments	
Phase 2	111	Houses	82	37/ha	4,131m ² (14%)	Local Shop 56m ² NC2 1,733 m ²	-	7no. houses	11
		Apartments	29					4no. apartments	
Total	349	Houses	196	35/ha	16,207m ²	4,362m ²	c.1,700m cycle scheme	19no. houses	35
		Apartments	153					16no. apartments	

Table 2.10: Phasing

The phasing proposed splits the development with approximately 70% of the development area in Phase 1 and 30% in phase 2. Phase 1 will include the entire cycle scheme along the Clonminch Road, a crèche and the pumping station and associated infrastructure for the entire development. Phase 1 also provides the majority of public open space which will be landscaped for use by phase 1 residents and a neighbourhood centre building to provide supporting services. As detailed above, both phases of development include a mix of house types and apartments. Housing to the south of the link street in phase 2 reflects the sequential development suggested by the TTEDP and will provide a local shop and second neighbourhood centre building to further support the increase in population expected.

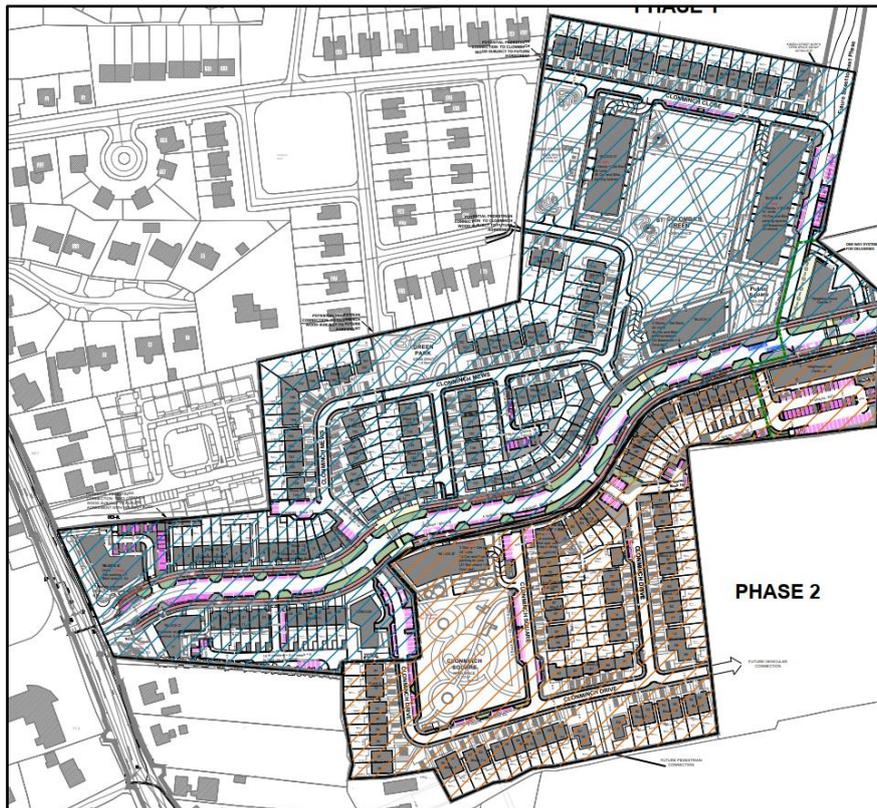


Figure 2.20: Proposed Phasing Plan – please refer to architect drawing no. 1757-PA-004)

In order to ensure all residents have access to public open space from the start of construction on site, a detailed phasing plan is proposed for phase 1 as illustrated by figure 2.21. This will ensure there is a mix of unit types and public open space provided from first occupation. The proposed crèche is located in construction phase 1 and will be provided with the first 79 units constructed.

We note that the provision of the neighbourhood centre buildings is not restricted by the provisions of the Core Strategy and can be provided at any stage of development should there be sufficient critical mass to support these services and facilities.

As detailed above, the site layout has been developed from an assessment of the site context having regard to lower density residential development to the north south and east of the development site. The most suitable location for taller buildings is towards the northern part of the application site at distance from existing two storey developments and where it can assert its own character and define the large public park called St. Columba’s Green. This location also marks the transition to the neighbourhood centre lands and the reserved school site which requires a more urban form of development. The increased density will also be required to support the extended neighbourhood services in phase 2



Figure 2.21 (please refer to architect drawing no. 1757-PA-027)

Phase 1	Open Space	Non-Residential	Unit Total	Apartments	Houses
A	3,911m ²	crèche	79	21	58
B	8,165 m ²	NC1	159	103	56
Total	12,076 m²		238	124	114
Phase 2	4,131m ²	Local Shop & NC2	111	29	82
Total	16,207m²		349	153 (44%)	196 (56%)

Table 2.11 – Sub-phasing breakdown of residential units, public open space and supporting land uses

3.0 NATIONAL AND REGIONAL PLANNING POLICY BACKGROUND

3.1.1 PROJECT IRELAND 2040- NATIONAL PLANNING FRAMEWORK

The application site is in Tullamore which is located within the Eastern and Midland Region. The National Planning Framework (NPF) recognises there are significant contrasts across this Region, with distinctive areas and associated strengths and challenges but all main towns are strategically placed in a national context (p.32).

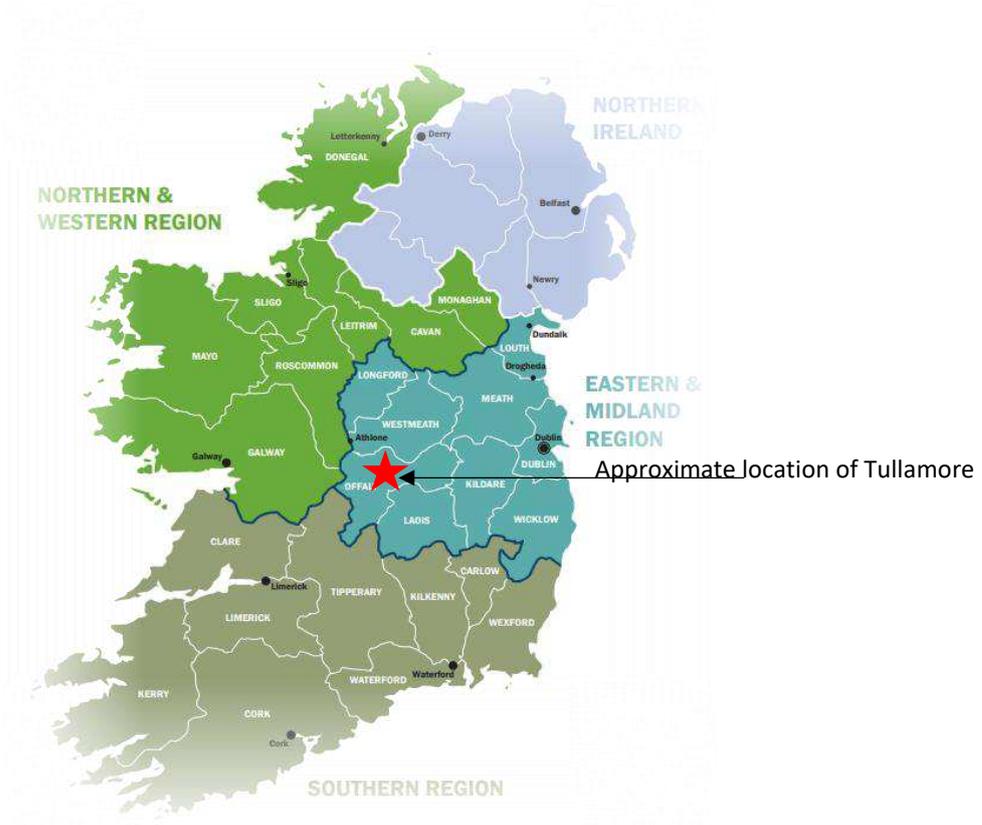


Figure 3.1: Extract from the National Planning Framework

According to the NPF, “the Midlands is strategically important”. Bordering both the Northern and Western, and Southern Regions “its central location in Ireland can be leveraged to enable significant strategic investment to a greater extent than at present, supported by a sustainable pattern of population growth, with a focus on strategic national employment and infrastructure development, quality of life and a strengthening of the urban cores of the county towns and other principal settlements” (para.3.2:32).

Location of Future Residential Development: It is a National Policy Objective (NPO 33) to “Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location” (p.93).

While population projections are not provided beyond a County Level in the NPF, it is stated that, *“There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth”* (p.60).

As detailed at Appendix 2 of the NPF, there is a high ratio of jobs to resident workers in Tullamore, reflecting its role as an employment centre and the extent of its area of influence.

Population growth is expected in the County of Offaly with population projections contained within the NPF estimating an increase of between 7,000-8,500 persons to 2026 and a further population increase of between 3,000-3,500 by 2031. This represents an increase in population of between 9-11% from its recorded population in 2016 to 2026.

While projections are not provided below the County level, the NPF states “It is not expected that all towns, large or small, will each target the same level of growth to 2040 and targets set in accordance with the Framework and the Regional Spatial and Economic Strategies will be reviewed based on performance, by 2027. But all towns can and must grow over this period and some will be identified as having capacity for higher than average levels of growth” (p.62).

Tullamore is the largest urban settlement in County Offaly, providing for the majority of employment and sustains a large portion of the population of the entire county. The County Core Strategy currently allocates 61% of the County’s population growth up to 2020 to Tullamore. It is submitted that it is reasonable to assume that Tullamore has the capacity for higher than average levels of growth and will be allocated the majority of population growth in the County.

Section 4.4 of the NPF states that planning to accommodate strategic employment growth at regional, metropolitan and local level should include consideration of,

- *Current employment location, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises.*
- *Locations for expansion of existing enterprises.*
- *Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability* (p.64).

IDA Ireland won 19 projects for the Midlands, from 2010-2014³. Multinationals located in Tullamore include Covidien (medical devices), Sennheiser Ireland (Sound Systems and Centre of Excellence for Acoustic Transducer Technology), Isotron Ireland (ETO sterilisation), Integra LifeSciences (surgical instruments) and GeneMedix (biogeneric pharmaceutical products). The Midlands Regional Hospital is located in Tullamore and currently operates with 195 inpatient beds with in addition to an extension to services recently permitted under P.A. Ref. 19-616 including a new 6-bed acute assessment unit. The presence of the Hospital in Tullamore has attracted medical companies to Tullamore such as Midland Bandages and Zannini together with associated spin off jobs.

It is a priority of the Tullamore Town and Environs Development Plan 2010-2016 (as varied and extended) to develop an enterprise node within the Southern Environs to the immediate west of the application site. The TTEDP was varied in 2012 “to allow for general industrial use to be open for consideration within the Business/Employment land use zoning and in particular to allow for such use in the Southern Environs Masterplan area” (p.2 Variation No.2 Document). The Southern Environs Masterplan lands were reconfigured as part of this Variation to increase the Business/Employment lands by 10.5hectares to a total of 105hectares. There is clear direction in the promotion of the Southern Environs for future employment uses in direct proximity to the application site. Tullamore is clearly a centre capable of growth in line with NPF objectives.

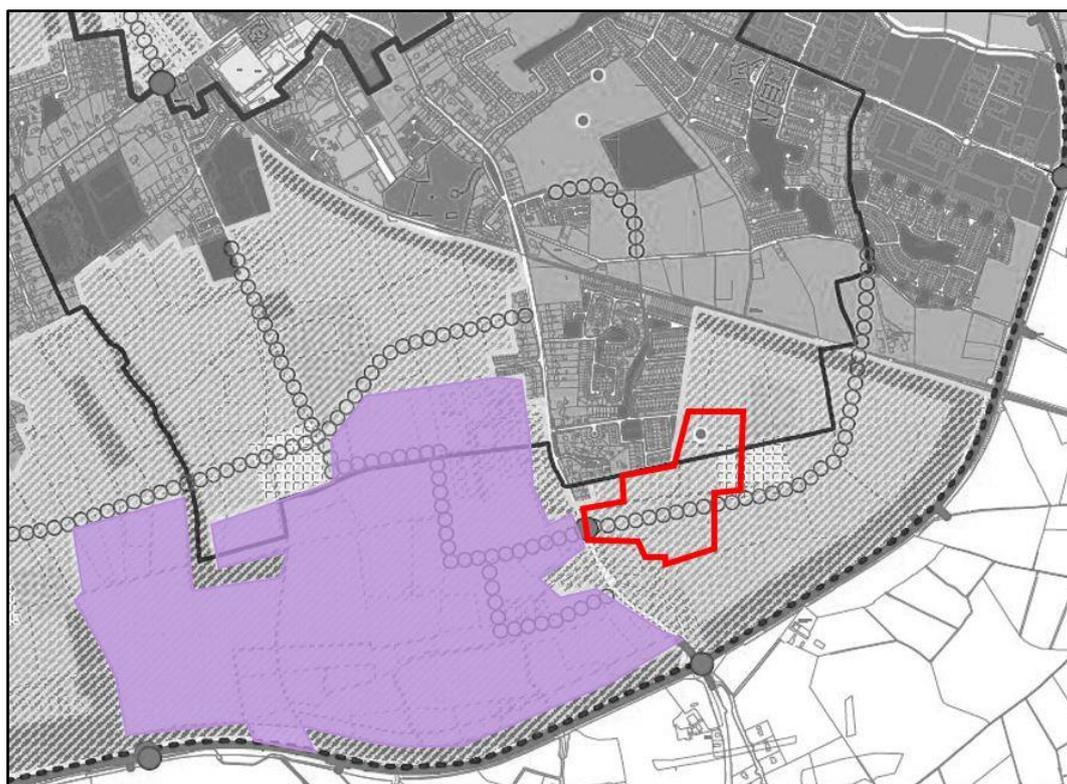


Figure 3.2: Location of lands zoned Business/Employment in proximity to the application site based on the Tullamore Town and Environs Development Plan 2010 (as varied and extended) shown in purple

³ Winning: Foreign Direct Investment 2015-2019 – IDA Ireland

According to the RSES, as a Gateway Region Key Town, Tullamore has the potential to accommodate above average growth (pg.78), facilitated by its location on a high quality public transport corridor connecting it to the Regional Growth Centre of Athlone, and aligned with requisite investment in services, amenities and sustainable transport (para. 4.6:65). In terms of service provision, Tullamore is placed at Level 2 of the Retail Hierarchy together with Athlone and Mullingar in Westmeath.

In relation to Residential Development, the RSES supports the provision of housing in Tullamore for a range of housing types, tenures and densities which are well designed with integrated green infrastructure, active travel links and renewable energy options (p.82). According to the RSES, *“The provision of housing at the right locations will play a fundamental role in the overall economic, social and environmental success of the settlement”* (pg.82).

The proposed development is fully in keeping with the vision for Tullamore as contained in the RSES. The range of house types proposed, improvements to green infrastructure including the provision of cycle tracks into Tullamore town centre and efficient use of zoned serviceable lands, will support the future growth of this key town at a location designated for employment growth.

The RSES seeks to capitalise on Tullamore’s accessibility *“as a key node between the M4/6 and M7 motorways”*. It is the intention of the RSES to improve the capacity and journey times on the N80, N52/N62 National secondary routes and the R420 to the M7 and the R402 to the M4 to enable greater intra-regional connectivity and improve the cohesiveness of the Midland area. The RSES also states, *“the R420 Tullamore to Monasterevin and R402 Edenderry to Enfield roads perform functions akin to National Secondary Routes, supporting Tullamore’s linkages to other Key Towns and the Regional Growth Centre of Athlone and these should be considered for upgraded status in the future”*.

The RSES supports the appraisal and or delivery of the N52 Tullamore to Kilbeggan road project as detailed at Table 8.4 of the Strategy. According to Transport Infrastructure Ireland, the N52 Tullamore Kilbeggan Link has completed the Project Appraisal Plan phase and a route has been selected together and a preliminary design, EIA and CPO completed. This serves to demonstrate the further investment and improved connectivity to Tullamore as a Key Town in the Region.

According to the RSES, an upgrade to the wastewater network is required to enable the future development of the town. Irish Water have completed a Drainage Area Plan of the town, which will be used to inform proposals into the future (p.83).

In preparation for this SHD application, DBFL Consulting Engineers have consulted with Irish Water and Offaly County Council. Irish Water have issued Confirmation of Feasibility for the proposed development and confirmed there is sufficient capacity available at the Tullamore Wastewater Treatment Plant to facilitate the proposed development. Irish Water confirm that the Southern Interceptor Sewer (SIS) will be the enduring wastewater solution for the application site but have accepted that interim works outlined in the confirmation of feasibility would enable the proposed development to proceed in the short term. Once the SIS project is completed the long term wastewater connection for the development can be completed to an agreed location on the SIS.

3.1.3 REBUILDING IRELAND AND SUSTAINABLE URBAN HOUSING

Rebuilding Ireland – Action Plan for Housing and Homelessness was launched in 2016 with the aim of doubling the annual level of housing output to 25,000 homes per annum over the period of 2017-2021. The achievement of the Plan’s core objectives falls under five pillars. The proposed development falls under ‘Pillar Three —Build More Homes’ with the key objective to *“Increase the output of private housing to meet demand at affordable prices”*. Unfortunately CSO figures are not available at a settlement level but figures for Offaly Council County Area show new completions since the Action Plan was launched in 2017 and 2020 amount to 669 units. It is clear that the level of completions has not provided for the projected housing needs of the County. It also needs to be borne in mind that the completion figures include ‘one-off’ houses and these do not generally come on the market when first completed.

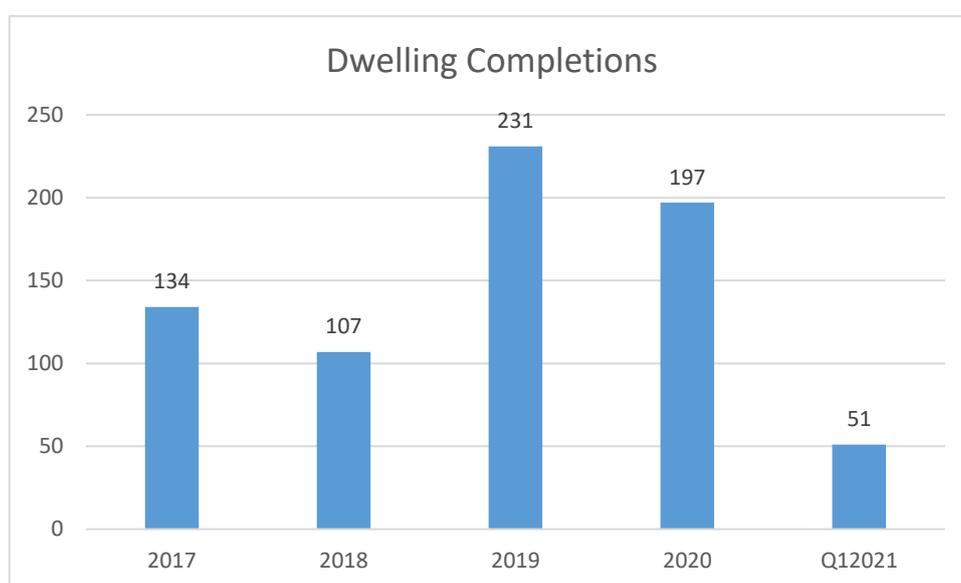


Figure 3.4: Completed Dwellings in County Offaly 2017-Q12021 (CSO)

3.1.4 HOUSING FOR ALL – A NEW HOUSING PLAN FOR IRELAND

A new National Plan addressing housing supply has recently been launched for the period 2021-2030. According to ‘Housing for All – A New Housing Plan for Ireland’ (2021), Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households as outlined in the National Planning Framework up from approximately 20,000 homes a year.

“Increasing New Housing Supply” is one of four pathways identified by the Plan to achieve the objectives. Under this pathway, new arrangements will be introduced for Large-Scale Residential Developments (LSRD) that will replace the current Strategic Housing Development (SHD) arrangements.

The proposed development will contribute to the increased supply required to meet the demand for housing in a key town including the provision of social/affordable housing.

4.0 LOCAL DEVELOPMENT PLAN POLICY

The statutory Development Plan affecting the application site is the Tullamore Town & Environs Development Plan 2010-2016 (as varied and extended). The policies of the Offaly County Development Plan (OCDP) 2014-2020 are also relevant.

The following sections of this Statement demonstrate how the proposed development is in keeping with the policies of the above Local Plans. For ease of reference, policies from each Plan are individually referenced as follows:

- Offaly County Development Plan 2014 (as varied)- (OCDP 2014)
- Tullamore Town & Environs Development Plan 2010 (as varied and extended) – (TTEDP 2010)

The Offaly County Development Plan is currently under review. The draft Offaly County Development Plan 2021 was placed on display from the 27th of July 2020 to the 7th of October 2020 and material alterations were on display until the 16th of July.

4.1 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE OFFALY COUNTY DEVELOPMENT PLAN 2014-2020 (AS VARIED)

4.1.1 CORE STRATEGY AND SETTLEMENT HIERARCHY

The Core Strategy as contained in the Offaly County Development Plan 2014-2020 (OCDP) provides the direction for new development within the County for the period 2014-2020. The Core Strategy ensures consistency with higher level plans by focusing on the following three main areas-

1. Settlement Hierarchy
2. Population Targets
3. Future Housing Land Requirements

The main principles of the settlement strategy for County Offaly are as follows-

- *To stimulate population growth in Tullamore in accordance with its identified role as part of the Midlands Linked Gateway so that it can form part of the driver of development for the region as envisaged in the National Spatial Strategy (NSS) and MRPGs (2010).*
- *To conserve, enhance and strengthen the town and village structure within the county.*
- *To inform decisions on the management of growth patterns in accordance with the county's settlement hierarchy (para. 1.5:11).*

Since the adoption of the OCDP, the Regional Spatial and Economic Strategy (2019) (RSES) has replaced the Midlands Regional Guidelines. The terminology and settlement hierarchy used in the OCDP differs from the new Regional Guidelines, with Tullamore categorised as a Linked Gateway town in the OCDP while in the new Regional Guidelines Tullamore, it is identified as a Key Town. What remains unchanged is that Tullamore is a settlement targeted for growth and important to the success of the Region. Tullamore remains the largest urban settlement in Offaly's settlement hierarchy and its Key Town Status is no longer linked to any other urban area.

Table 1.1 of the Plan describes Tullamore as a "Linked Gateway Town- Identified as a 'driver; for regional growth the Linked Gateway is the focus for the bulk of target population for the period 2019-2022" (Pg.13).



Figure 4.1: Core Strategy Map (Extract from OCDP 2014-2020)

The 'linked gateway' has been replaced in the RSES adopted in June 2019, with Tullamore now categorised as a Key Town and identified as a Regional Growth Centre within the Gateway Region. It is acknowledged that there is an inter-relationship between the towns of Athlone and Mullingar and the RSES supports improved connections between them (RSES, p.57).

As the only Key Town identified in the County of Offaly, it is likely that Tullamore will attract a significant proportion of population growth during the new Regional Plan period as highlighted at Section 3.1.2 of this statement.

Table 1.3 of the OCDP states that within the Plan period 2014-2020, the population of Tullamore is expected to grow by 5,570. Based on an average household size of 2.9, this is equated to 1,921 units by the County Plan. Using an average residential density of 35 units per hectare, the OCDP states that 82 hectares of residential zoned land is required including an allowance of 50% headroom. Table 1.5 confirms that Tullamore has been allocated the largest projected population growth in the Core Strategy in order to build an appropriate critical mass to enable a range of services and facilities to serve County Offaly and the Midlands Region. It is the policy of the OCDP (SSP-01) to prioritise the development of Tullamore.

According to the OCDP, in addition to the Core Strategy Table and Land Use Zoning, the Planning Authority will have regard to extant permissions and development completed to date in determining the suitability of residential applications on appropriately zoned lands as well as the potential for the development to result in adverse environmental effects including likely significant effects to European sites (Para. 1.15.2).

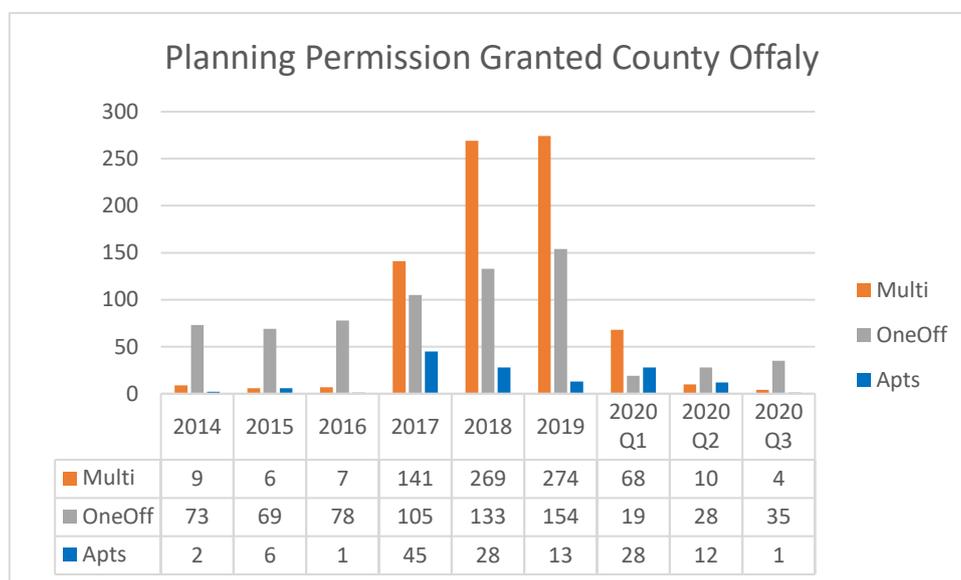


Figure 4.2: Offaly Residential Dwellings Granted Planning Permission based on CSO data

The above chart represents the number of units for which planning permission was granted in County Offaly since the OCDP adoption in 2014 based on data from the Central Statistics Office. Unfortunately data is not available for Tullamore. However, this data clearly demonstrates that between 2014 and Q3 2020 1,618 units were granted planning permission in the entire County which is less than the requirement identified for Tullamore alone. When one-off houses are excluded this figure drops to 830 multi-unit houses and apartments.

While it is acknowledged that the application site falls within the area subject to the Tullamore Town & Environs Plan 2010-2016 (as varied and extended), the Offaly County Development Plan 2014-2020 is the overarching strategic framework for the County up to 2020 and provides a more up to date assessment of the future population growth and allocation of population within the settlement hierarchy of the County. The population allocation to Tullamore by the OCDP is proportionate to its position as the largest town in the Settlement Hierarchy for County Offaly.

The proposed development complies with the core strategy household allocations included in the settlement plan of the Offaly County Plan by providing residential accommodation on appropriately zoned lands in Tullamore. The application site development area represents 14% of the 82ha identified as required to facilitate growth in Tullamore.

4.1.2 RESIDENTIAL DEVELOPMENT

It is recognised that Offaly, with 40% of its population living in dispersed rural areas, represents a significant challenge to integrated land use planning (para. 4.4:78).

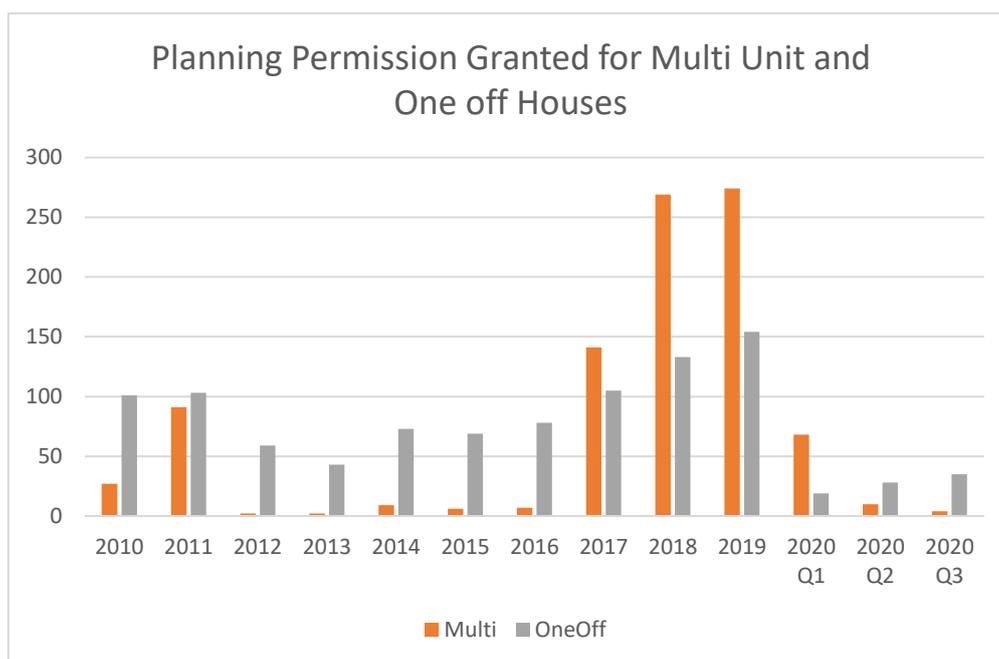


Figure 4.3: Comparison between multi-unit and one-off housing granted planning permission in Offaly based on CSO data

As illustrated by the above chart, the high proportion of one-off houses granted planning permission remains the case in County Offaly with the number of one-off houses granted planning permission exceeding multi-unit housing developments in 2014, 2015 and 2016 and returning again in Q2 2020. While 2017 marked a change in development permitted, one-off houses still represented 43% of all houses permitted that year. When completion figures are examined for the County, one-off houses also exceed the completion rates of multi-unit developments as illustrated by Figure 4.4.

It is submitted the proposed development within the settlement boundary of Tullamore that is guided by a Masterplan on zoned and serviceable lands is a more sustainable form of development and will help counteract the dispersed pattern of development in the County to date.

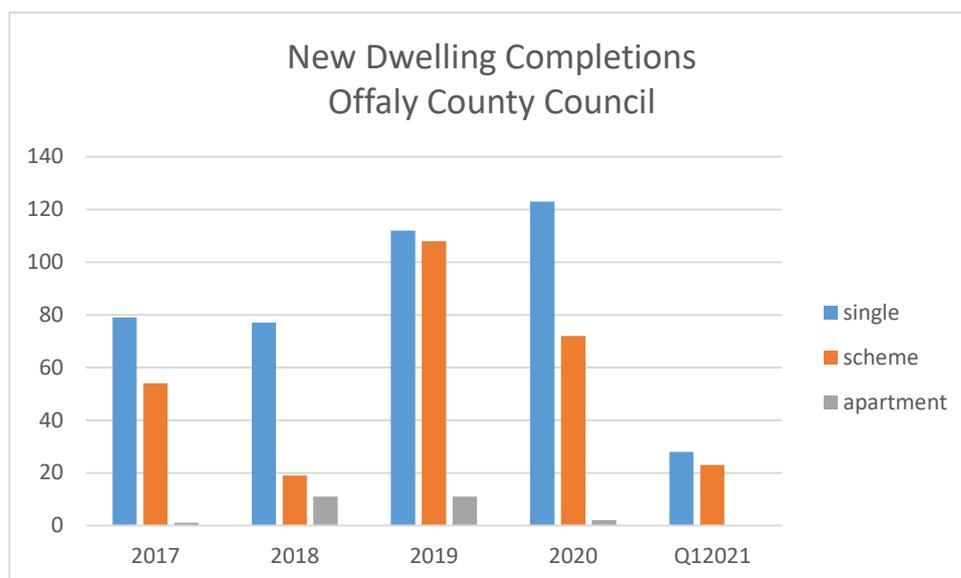


Figure 4.4: Dwellings completions County Offaly (Source: cso.ie)

The proposed development accords with the following Settlement Strategy Policies of the OCDP-

SSP-03 *It is Council policy that future residential development proposals shall be located in accordance with the provisions of the settlement hierarchy set out in the Core Strategy, and at a scale appropriate to the levels identified in the Core Strategy Table and the accompanying land use zoning maps.*

The proposed development is located in the Key Town of Tullamore. Given the level of projected housing need in Tullamore under the Core Strategy as outlined in the OCDP, it is submitted the provision of 359no. units is in keeping with SSP-03.

Site identification should incorporate the following characteristics:

- *Develop sequentially from the centre of existing settlements and maintain the existing pattern and character of settlements and;*

The application site is contiguous to existing residential development and employment areas to the south of Tullamore and within the settlement boundary.

- *Make efficient use of existing and proposed infrastructure and;*

The proposed residential density of 35 dwellings per hectare makes efficient use of zoned serviceable lands.

- *Integrate with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.*

As part of the proposed development, a cycle scheme from the application site north towards Tullamore Town Centre is included and to be completed in Phase 1. This key linkage will improve access to the existing transport network including Tullamore train station. In addition, the provision of local neighbourhood services and childcare within walking distance of the dwellings proposed and DMURS compliant layout will encourage residents to opt for more sustainable modes of transport and avoids the use of the private car for short trips.

- *Respect environmental and landscape elements such as designated sites, watercourses, hedgerows, treelines and stone walls.*

It is evident from the Development Plan, the Southern Environs Masterplan as well as the Nodal Masterplan and supporting environmental studies that this area of Tullamore is the least environmentally constrained area. The screening report for appropriate assessment that accompanies this request has identified a hydrological pathway to the Charleville SAC and a Natura Impact Statement will accompany the full planning application. A tree and hedgerow study informed the proposed development and wider Nodal Masterplan area. A development impact plan is submitted by Park Hood with this request (6473-L-302).

SSP-04: It is Council policy to encourage the provision of high quality residential design and layout in all settlement areas in accordance with the Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual', published by DoEHLG, 2009.

The proposed development is fully compliance with the above Guidelines. Section 5 of this Statement demonstrates how the proposed development complies with the 12 criteria of the Urban Design Manual in detail. The development has been designed by an award winning firm of experienced architects with inputs from other competent experts.

SSP-07 It is Council policy to require applicants proposing large scale residential development i.e. over 50 residential units to provide a statement to assist the Planning Authority in assessing the sustainability of the proposal in the context of integrating land-use with sustainable transport and avoiding deterioration of the natural environment. The statement must address the following:

- *Assessment of proximity and access to existing public transport connections and safe routes for walking and cycling to access such connections and other local amenities.*

The application site is connected to the town centre and train station by an existing bus service that currently stops to the north at Clonminch Wood. There is full footpath connectivity to the town centre from the application site and the proposed cycle tracks will improve accessibility for all residents of Clonminch Road. The proposed neighbourhood centre provides local services and amenities within walking distance.

- *Integration of cycling and public transport.*

The proposed site layout is DMURS compliant with priority given to pedestrians and cyclists throughout the development and allows for onward connection through adjacent lands in keeping with the Nodal Masterplan for the Eastern Node. The improvement works proposed on the Clonminch Road will encourage cycling as a realistic mode of transport for journeys to work and school. The critical mass provided by the new neighbourhood will enable the extension of existing local bus services. The site layout has been designed within this in mind.

- *How the proposed development promotes new residential and mixed-use development to take place on brownfield/existing sites to consolidate urban growth and enable organic development of urban areas from the centre out.*

The application site is contiguous to the existing urban area of Tullamore and within the defined settlement boundaries. The development proposed provides the necessary infrastructure to develop the Eastern Node which has long been identified as a growth area within Tullamore. The Nodal Masterplan that accompanies this application will ensure development is phased with necessary neighbourhood centre and school facilities provided for future need.

- *Ensures a general minimum housing density as advocated in the Core Strategy for urban areas of suitable size and population and higher densities where local circumstances warrant, particularly in high capacity public transport corridors.*

The development proposed results in a residential density of 35 units per hectare which is recognised as an efficient use of zoned land⁴ and is compliant with the residential density set by the OCDP for Tullamore in its Core Strategy.

- *Addresses the specification of a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/ cycling distance to amenities.*

A full analysis of car parking is provided in the Traffic and Transport Assessment by DBFL Consulting Engineers that accompanies this application under separate cover. The development proposed seeks to balance the car parking requirements of the TTEDP and OCDP with the promotion of more sustainable modes of transport and the potential dominance of car parking. Car parking for apartments follows the recommendations contained in the Sustainable Urban Housing: Design Standards for New Apartments (2020).

- *The provision of a viable travel plans for larger developments.*

The neighbourhood centre provides an opportunity to have a community noticeboard where information on bus and train services can be displayed. The TTA prepared by DBFL contains details on the mitigation strategy to off-set the additional local demand that the proposed development could generate. It is also submitted that the provision of neighbourhood facilities within walking distance of dwellings proposed will negate the need for short journeys by car for top-up shopping or local needs.

⁴ para. 5.11, Sustainable Residential Development in Urban Areas (2009)

- *Incorporation of ways in which the development encourages a switch to more sustainable modes of travel.*

The proposed development is DMURS compliant. This means that the pedestrian and cyclist are given priority over the private car. Cycle ways are provided within the development and connections are provided for into existing residential development to create permeability. The provision of segregated cycle tracks into Tullamore Town Centre is key to encouraging a switch to cycling as a realistic mode of transport to work and school.

The application site is part of a wider masterplan area for which a Masterplan document has been prepared to ensure connectivity extends to lands beyond the application site and outside of the applicants ownership. In time this area will have the critical mass required to be served by public transport such as extending the existing bus route serving the Clonminch Road. The link street is suitable for buses.

- *Provision of landscape treatment plan addressing protection and promotion of existing flora and fauna including hedgerows, native species, planting and appropriate leisure/ recreation amenity areas for the community.*

Park Hood Landscape Architects have prepared a detailed landscape Masterplan for the application site in conjunction and retains existing trees and hedgerows where possible. Planting proposed is pollinator friendly and uses native species.

4.1.3 ECONOMIC POLICIES

The Council recognises the potential for economic growth and success in the County and states that Tullamore will account for a very significant portion of economic and employment growth (para. 2.5.1). The following policies of the OCDP are relevant to Tullamore in particular-

EntO-01: "...to seek to reserve lands within Tullamore which will make provisions for potential national and regionally significant activates and to attract specialist large-scale enterprise development within the County.

EntP-02: It is Council policy to co-operate with local, regional and national enterprise authorities, most notably the IDA and Enterprise Ireland, in the attraction of investment into the county, including both overseas investment and local investment and the provision of employment / enterprise within Offaly.

EntP-03: It is Council policy to strengthen and channel development into Tullamore the primary driver for economic development within the county, a role identified as part of the Midlands Linked Gateway as set out in the National Spatial Strategy and the Midland Regional Planning Guidelines. The Council will explore and

support opportunities for a coordinated approach to economic development across the three linked gateway settlements.

The promotion of growth in the enterprise sector in Offaly will create a draw to the County and is projected to increase the population of Tullamore as a primary driver. In order to support continued economic development, residential development must be provided for existing and future employees.

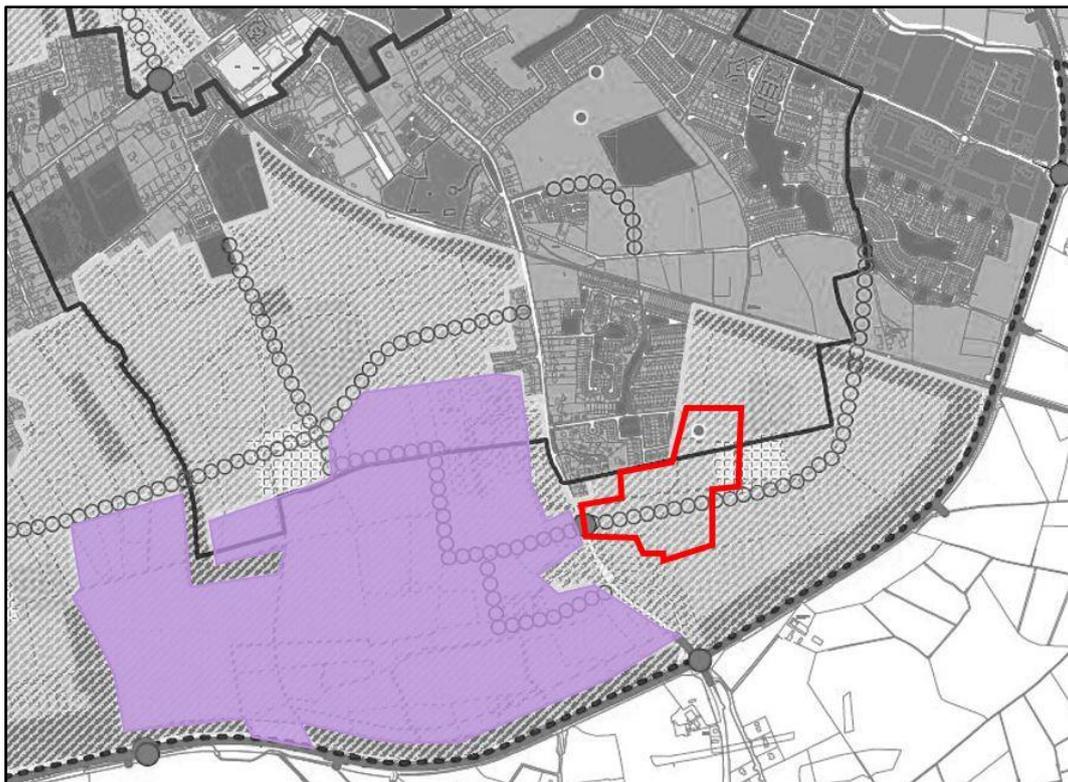


Figure 4.5: Location of lands zoned Business/Employment in proximity to the application site based on the Tullamore Town and Environs Development Plan 2010 (as varied and extended) indicated in purple

4.1.4 COMMUNITY INFRASTRUCTURE

Childcare: It is Council policy to encourage the provision of childcare facilities as an integral part of proposals for new residential developments (CSCP-06). The Planning Authority will have regard to the DEHLG's Childcare Facilities Guidelines for Planning Authorities, 2001 in relation to the provision of childcare facilities.

The proposed development includes a childcare facility that has been designed to cater for 100no. children in keeping with the Guidance contained in the Childcare Facilitates Guidelines.

School Capacity Assessment: It is Council policy to ensure that no significant residential developments proceed without an assessment of existing school capacity or the provision of new schools facilities in tandem with the development (CSCP–16).

A School demand and concentration report has been prepared by Stephen Ward Town Planning and Development Consultants and is submitted under separate cover. This report concludes that taking into account the predicted potential demand for school places generated by the proposed development, existing school enrolments, expansion plans approved to existing schools together with the predicted decline in enrolments, there is sufficient capacity in Tullamore to absorb the potential need.

The application site forms part of a wider masterplan area called the Eastern Node. Within the Eastern Node there are lands identified for the future provision of a primary school. Following consultation with the Department of Education and Skills during the preparation of the Nodal Masterplan for the Eastern Node, the Department states that this school is not currently required but recommends the continued reservation of a school site for the wider area in the future.

4.1.5 NATURAL HERITAGE

The following principles guide the Council’s heritage policies and objectives:

- To avoid damage or loss of natural heritage.
- To mitigate the effects of harm where it cannot be avoided.
- To promote appropriate enhancement of natural heritage as an integral part of any development
- To promote a reasonable balance between conservation measures and development measures in the interests of promoting the orderly and sustainable development of Offaly.
- To promote bio-diversity (para. 7.2.1).

Appropriate Assessment: Policy Objectives NHP-01, NHP-02 and NHP-04 of the County Plan relate to the protection of the Natura 2000 network and the screening for appropriate assessment of any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect on a European site(s), either individually or in combination with other plans or projects, in view of the site’s conservation objectives in accordance with the Department of Environment, Heritage and Local Government Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009.

The application site is not within or adjacent to a special protection area but a hydrological pathway has been identified linking the application site to Charleville Wood SAC (000571). This application is accompanied by a Natura Impact Statement in order to assist An Bord Pleanála in carrying out an appropriate assessment. The NIS provides an examination, analysis and evaluation of the likely impacts from the project, both individually and in combination with other plans and projects, in view of best scientific knowledge and conservation objectives of the European Site concerned. It is submitted that on the basis of the information provided it can be concluded that the proposed development will not result in significant adverse effects to the integrity and conservation status of any European site and there is no reasonable scientific doubt as to that conclusion.

Biodiversity: It is the policy of the Council-

- To use native species wherever possible in the county including Offaly County Council's own landscaping work and on Council property (NHP-20).
- To discourage the felling of mature trees to facilitate development and to encourage tree surgery rather than felling where necessary (NHP-21).

The application site and wider Nodal Masterplan area has been designed by qualified and experienced landscape architects Park Hood. Planting proposed is both native and pollinator friendly and reflects the recommendations of Table 14.1 of the TTEDP.

As part of the baseline, a tree survey was undertaken. No trees of exceptional quality were discovered with most being of poor quality. Notwithstanding this finding and also noting the Development Plan does not identify any trees or hedgerows of merit, the opportunity has been taken to incorporate some trees and segments of hedgerow. A Development Impact Plan is provided to illustrate how the development affects existing vegetation (Park Hood Drawing 6473-L-302).

4.1.6 TRANSPORT SERVICES AND INFRASTRUCTURE

It is recognised that Offaly, with 40% of its population living in dispersed rural areas, represents a significant challenge to the provision of public transport as it drives the necessity for private car use (p.19).

In order to promote sustainable transport to reduce levels of car dependency the OCDP promotes:

- Higher densities at appropriate locations.
- Mixing land-uses.
- Designing for compact settlement forms and
- Concentrating appropriate development on transport corridors and linkages (para. 4.5.1).

The proposed development offers a compact, efficient and mixed use development on a zoned site contiguous to the settlement of Tullamore. The cycle tracks to be provided offer significant planning gain and will assist in the move away from car dependency. Provision is made for future bus services to access the development.

It is a Policy of the TTEDP "to continue the programme of improvement of footpaths/cycle paths throughout the town and to further develop/extend the network of interlinked pedestrian/cycle routes throughout the town and environs".

The proposed cycle scheme will greatly assist in the achievement of this policy objective.

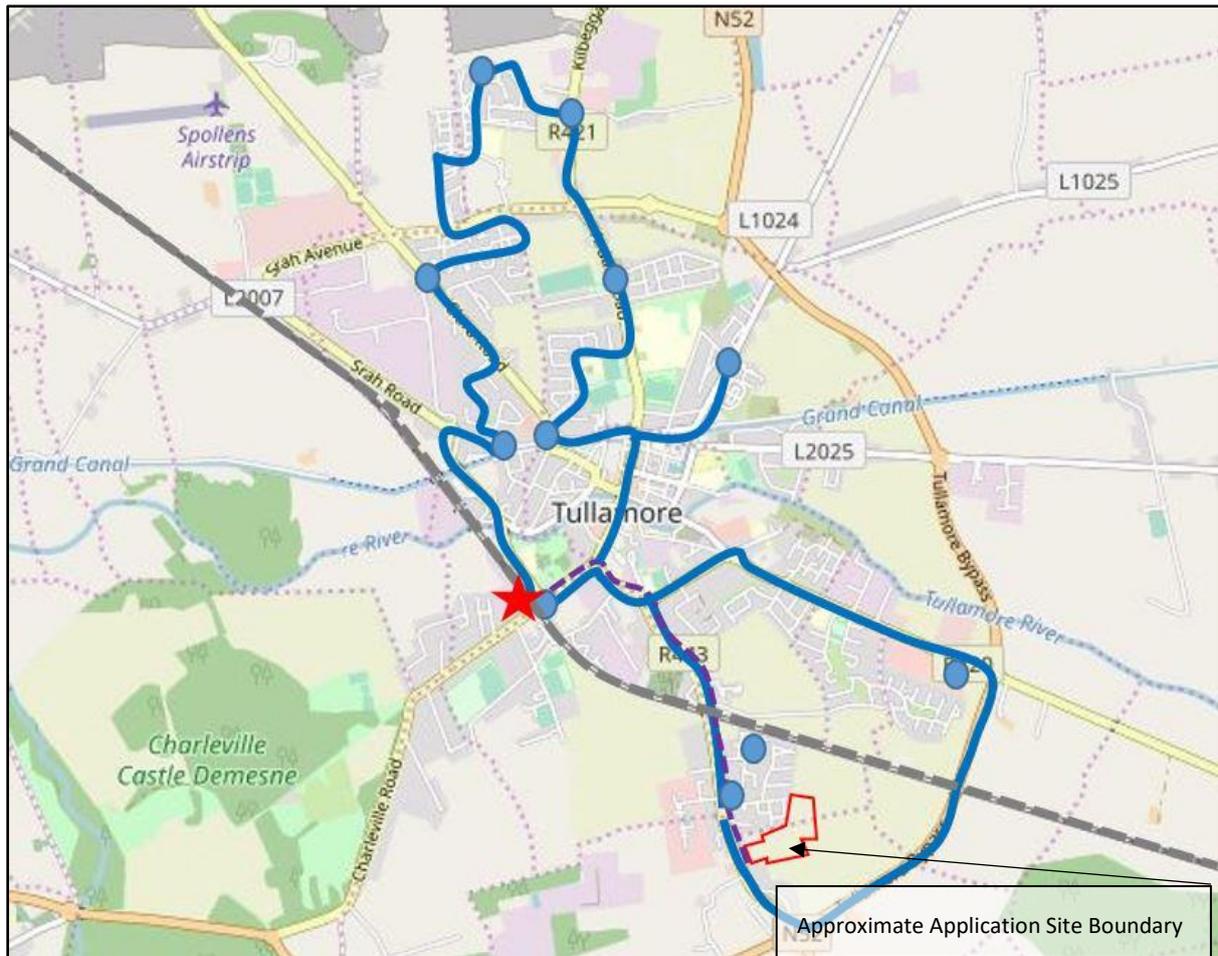


Figure 4.6: Public Transport Connections

- Local Bus Route 835 ● Bus Stop
- ★ Train Station - - - Train Line - - - Footpath to Train Station

There is an existing bus stop at Clonminch Wood c.280metres from the site entrance (Route 835) which provides a local service to the town centre, train station, Tullamore Hospital and Retail Park to the east. As detailed in the Traffic and Transport Assessment by DBFL under separate cover, Sliebloom coaches currently operate a bus service seven times a day in both directions along Clonminch Road. As part of the Oaklee Part 8 development adjacent to the application site, agreement has been made to service a new bus stop. This stop is provided as part of the proposed SHD allowing this service to be made available immediately on completion of the proposed works. The train service in Tullamore provides eight services towards Galway and 12no to Athlone daily with 15no. daily services towards Dublin (Monday to Friday). Further analysis of the public transport network is provided in the TTA by DBFL Consulting Engineers under separate cover.

The proposed development will assist in the achievement of the following policy objectives-

STAP-04 *It is Council policy to promote more compact development forms that reduce overall demand for transport and transport infrastructure and support proposals that encourage modal shift towards sustainable travel modes.*

STAP-11 *It is Council policy to co-operate with and encourage Iarnród Éireann to secure the upgrading of the existing rail linkages between Athlone, Tullamore and Portarlinton.*

In order to support and further expand the public transport network in Tullamore it is necessary to build critical mass. The provision of 349no. dwellings and potentially 942no. residents will support the development of public transport in Tullamore.

STAP-21 *It is Council policy to ensure that developments which have the potential to generate significant traffic movement as a result of the use proposed are subject to a Traffic Impact Assessment. The Council may also require the provision of Road Safety Audits in the case of major road works.*

According to the Traffic and Transport Assessment Guidelines (2014), the threshold for Traffic Assessment to be prepared for a residential development is 200 units (Table 2.1). The proposed development consists of 349 no. dwellings and so a Traffic and Transport Assessment has been prepared by DBFL Consulting Engineers and is available under separate cover. This assessment concludes the proposed development can be facilitated via the proposed signal controlled junction that also allows for a fourth arm to be added in the future to serve the Enterprise Node to the west of Clonminch Road.

The OCDP explains that on publication of the Design Manual for Urban Roads and Streets in March 2013, the Design Manual for Roads and Bridges should no longer be applied to urban roads and streets other than in exceptional circumstances (para. 8.16.5:220).

The proposed development has been designed in accordance with the DMURS in relation to the design and configuration of streets within the proposed development and wider Eastern Node. It is recognised that the design principles promoted by DMURS improve street design for pedestrians and cyclist and thereby promote more sustainable modes of transport. Please find DMURS Compliance Statement by DBFL under separate cover.

4.2 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE TULLAMORE TOWN AND ENVIRONS DEVELOPMENT PLAN 2010-2016 (AS VARIED AND EXTENDED)

This Section provides extracts of relevant policies from the Tullamore Town and Environs Development Plan 2010-2016 (as varied and extended) (TTEDP).

4.2.1 LAND USE ZONING OBJECTIVE

Land Use Zoning- Under the TTEDP the majority of the application site is zoned ‘Residential’ with the area in which the neighbourhood centre buildings are located zoned ‘Neighbourhood Centre’. The site is also identified as a Masterplan area.

In accordance with Table 15.1, Apartments, Bring Banks, Childcare Facilities, Cultural Use, Community Facility, Dentist Surgery/Doctor Surgery, Education (School) Halting sites, Holiday homes, Open space/Playground (outdoor), Residential and Retirement home/village are all uses ‘normally permitted’ on lands zoned Residential.

Table 15.1 lists Advertising, Bring banks, Car Park, Childcare Facilities, Community Facility (Hall/Centre/Recreation), Craft Industry, Dentist/Doctor Surgery, Drive-through restaurant, Hairdressing Salon, Health Centre/Clinic, Library, Licensed premises (public house), open space/playground (outdoor), Place of Worship, Recreational facility/sports club, Restaurant/café, Shop (Large, including supermarket), Shop (local), Take-away and Veterinary surgery as ‘normally permitted’ ‘on lands zoned Neighbourhood Centre. Apartments and Residential land uses are listed as ‘open for consideration’

All proposed uses comply with the zoning matrix.

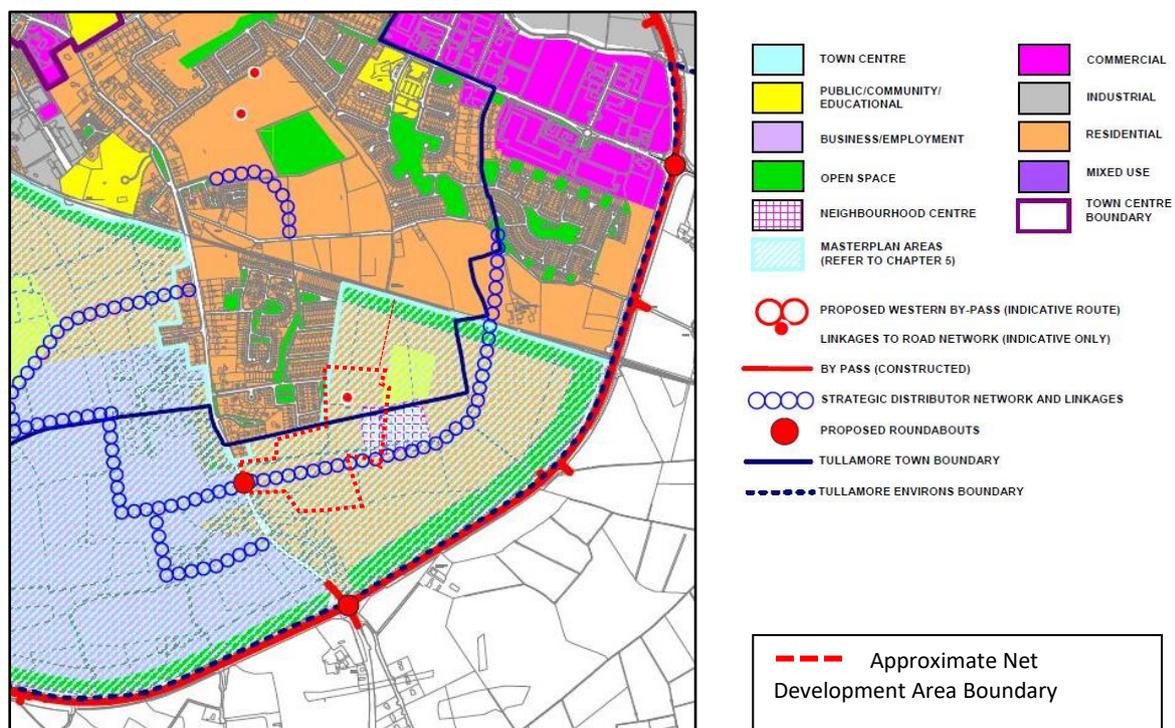


Figure 4.7: Land Use Zoning (Tullamore Town & Environs Development Plan 2019-2016 (as extended))

Part of the application site extends into lands zoned 'Open Space' along the railway line. The use of these lands for utilities, the vast majority of which are underground is not considered a material contravention of the zoning objective. We note the opinion of the Inspector in case ABP-307832-20 for the previously applied for SHD on the same application site involving the same infrastructure proposal states "I would not regard this aspect of the development as unacceptable in principle or in material contravention of the zoning objectives of the plan" (para. 12.1.5). The Board in their Direction found there to be no material contravention of the development plan.

4.2.2 MASTERPLANS

Chapter 5 of the TTEDP details the identified masterplan lands in Tullamore. There are four areas for which Masterplans have been prepared. These higher level Masterplans provide an Urban Design Strategy and Indicative Built Form for each identified area. Each Masterplan area is further sub-divided into nodes. Within the Southern Environs Masterplan there are four nodes. The application site is located in the Eastern Node. It is the policy of the Council that a detailed Masterplan be prepared for each of the nodes in consultation with the Planning Authority prior to the submission of a planning application for the development of that node (para. 5.4.3:15).

A Nodal Masterplan was prepared by the applicant for the Eastern Node as part of the planning application submitted under ABP-307832-20. The content of this nodal masterplan provided under separate cover remains largely the same. The key alteration has been to reflect the realignment of the link street through the eastern node in response to the decision of An Bord Pleanála and submission made by the NTA. The phasing provided for the Eastern Node has also been amended to better reflect the sequence outlined in Chapter 5 of the TTEDP.

The Nodal Masterplan submitted as part of this planning application has been prepared as required by the policies and objectives of the Tullamore Town and Environs Development Plan 2010-2016 (as varied and extended) to assist the future development of the Eastern Node in a comprehensive manner in order to achieve the objectives of the TTEDP. The TTEDP was subject to a Strategic Environmental Assessment and an Appropriate Assessment screening was undertaken. The Nodal Masterplan has been based on the policies and objectives of the TTEDP including the zoning objectives as illustrated by the Tullamore Town and Environs Landuse Zoning map and does not seek to determine the spatial development of these lands.

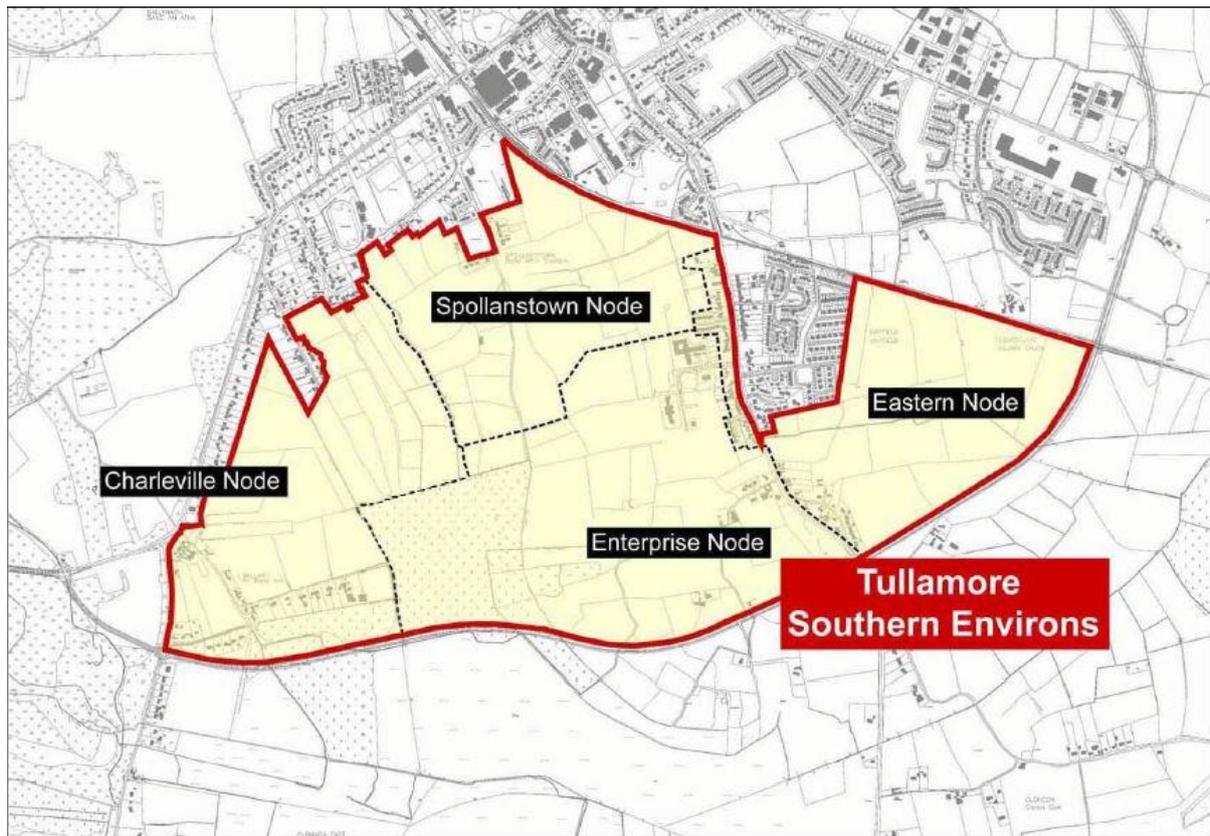


Figure 4.8: Extract from the Tullamore Town and Environs Development Plan 2010-2016 – Adopted Variation No. 1 (2012) Southern Environs Masterplan Area (p.5)

Specific Objectives: Table 5.5 of the TTEDP lists the ‘Tullamore Southern Objectives’. Within this table the following policies affect the Eastern Node in which the application site is located and were taken into account in the preparation of the Nodal Masterplan and brought through to the proposed development where relevant.

- EN1. *Seamlessly integrate into adjacent mature residential areas.*

The proposed development provides for future pedestrian connections into adjacent residential areas.

- EN2. *Provide surface water areas as amenity features which can operate as surface water attenuation (SUDS) systems. The location and construction phasing of such features shall be agreed with the Planning Authority prior to the commencement of development within this node.*

SUDS proposed as part of the development include surface attenuation areas which have been fully integrated into the landscape design proposed by Park Hood.

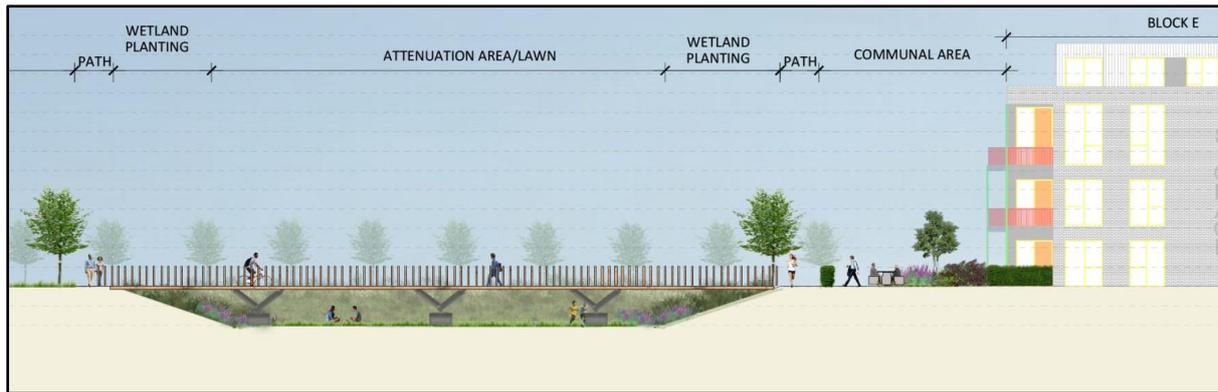


Figure 4.9: Extract from landscape section drawing illustrating attenuation area

- EN3. Encourage the provision of a potential bus route connecting peripheral environs areas as well as serving neighbourhood centres and business park users.

The proposed development includes the provision of two bus stops on Clonminch Road. The link street is suitable for regular bus services in the future. The link street provides direct access to neighbourhood centre buildings and in time the school site.

- EN4. Provide a neighbourhood centre to service new residents in this node. The provision of this neighbourhood centre shall occur concurrent with the provision of residential development within this node.

A local shop is provided at ground floor level in block F and two neighbourhood centre buildings are located on lands identified for Neighbourhood Centre in the Development plan and nodal masterplan. These buildings mark the entrance into the core of the Eastern Node. NC1 is located in proposed phase 1 and NC2 in proposed phase 2.

- EN5. Provide a primary level school to service new residents in this node. The development of the primary school shall occur concurrently with the provision of residential development with this node. In addition, as part of the preparation of a more detailed masterplan for this node, it must be demonstrated that consultation has taken place with the Department of Education in relation to the provision of schools in this node.

A school site has been reserved within the Eastern Node for the provision of a primary school. The Department of Education was consulted when the nodal masterplan was prepared. It has been assessed that the demand for school places as a result of the proposed development can be catered for by existing schools in Tullamore.

- EN6. No building shall be occupied within this node prior to the provision of water, foul sewerage and surface water infrastructure to the satisfaction of the Planning Authority.

Please see Engineers Report by DBFL for information on services infrastructure and correspondence with Irish Water.

- EN7. Provide a bridge in this node across the railway.

According to section 5.4.4.1 of the TTEDP (as varied and extended), *“The relevant landowners and developers shall work in cooperation with Iarnród Éireann and other relevant agencies and bodies to ensure that the bridge is delivered in tandem with the long term development of the Southern Environs Masterplan”*. The following items have been presented in the Nodal Masterplan prepared for the Eastern Node by the applicant who is the lead developer as required-

- Estimated cost in the form of a proposed scheme
- Indicative location,
- Design detail and
- Land reservation to accommodate the bridge and access road/ramps

According to the TTEDP, *“Delivery of the bridge will be contingent on securing private sector funding in the form of development charges and the Council will consider the means by which this is possible i.e. amendments to the Development Contribution Schemes for the Councils when proposed development levels in the overall masterplan area warrant same”* (para. 5.4.4.1, p.11 Variation No. 1 document).

As stated in the Nodal Masterplan for the Eastern Node, it is estimated that the infrastructural cost to provide road/ramps and bridge would be €1,500,000 excluding land acquisition costs. Based on the Southern Environs Development area of 322 hectares, the cost of providing the bridge, ramps and associated infrastructure over the railway would equate to €4,658 per hectare.

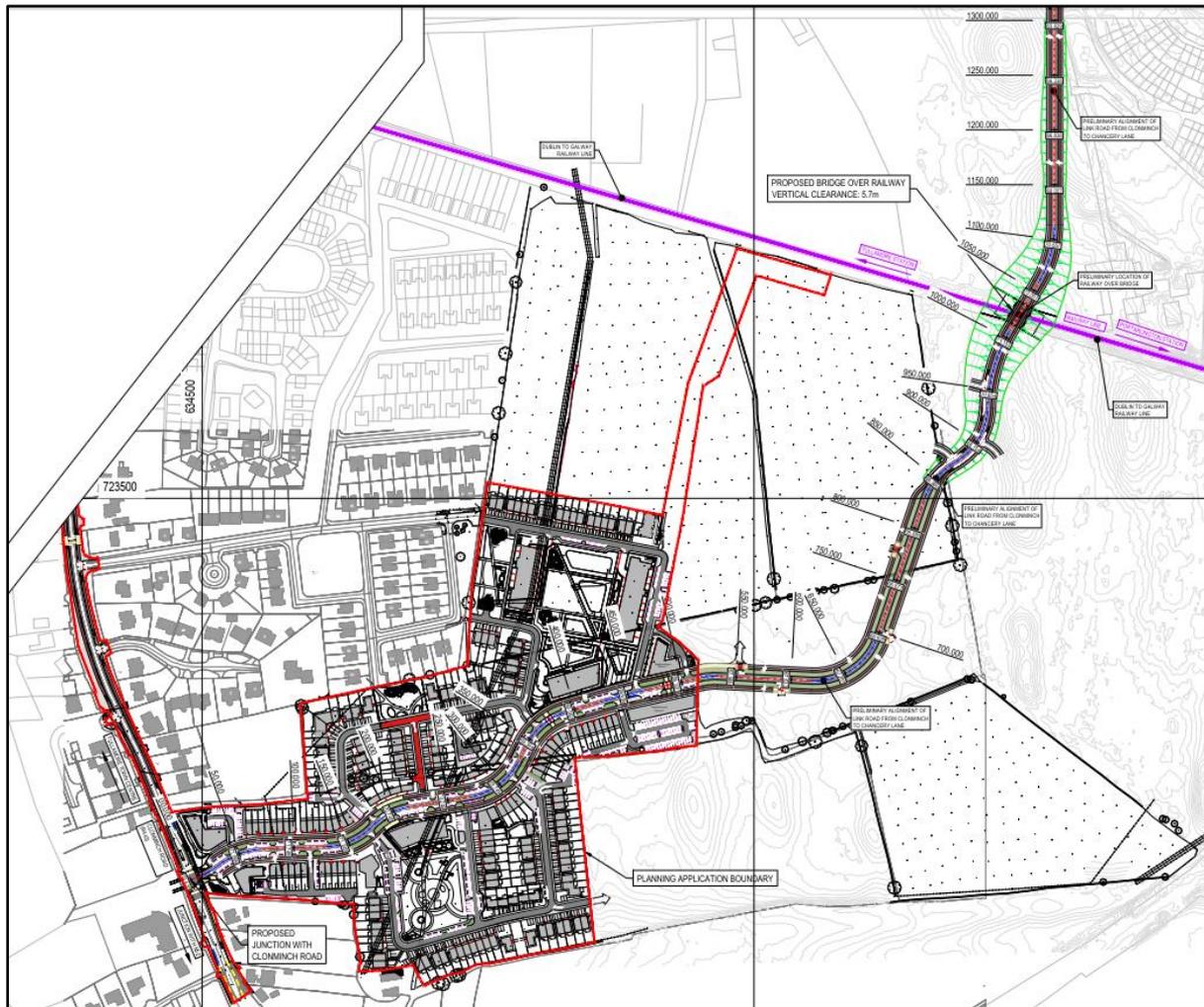


Figure 4.10: Extract from DBFL Drawing 1005- Preliminary alignment of road and railway bridge crossing

Strategic Objectives: The proposed development assists in the achievement of the following Strategic Objectives that apply to all four Masterplan Areas in Tullamore

SO3 To facilitate the sustainable phased expansion of the town into the masterplan areas in a coherent manner which facilitates complete integration between the town and its environs.

It is submitted that the development of the subject lands represents a sustainable extension to the existing footprint of Clonminch, being connected to the town centre, adjacent to future employment lands and self-sustaining by the inclusion of neighbourhood services and facilities.

SO4 To help meet the growing residential, services, employment and community requirements of the town in a sequential manner in line with proper planning and sustainable development.

The application site is zoned, serviceable and contiguous to the existing settlement footprint of Tullamore. The development proposed offers a variety of dwelling types and sizes to cater for all life stages.

SO6 To develop each masterplan area as a partially self-sustaining neighbourhood with a mix of land uses which facilitates the provision of local services that will reduce the requirement for movement and which helps foster a sense of community among local residents.

The Eastern Node in which the application site is located is one character area within the wider Southern Environs Masterplan Lands. This self-contained node lies to the east of Clonminch Road and west of the railway line lies to the south of the existing footprint of Tullamore. The provision of a neighbourhood centre and childcare facility within the first phase of development in the Eastern Node will ensure it becomes a self-sustaining neighbourhood with a mix of land uses which facilitates the provision of local services and reduce the need to use the private car. The public parks provide future residents with ample space in which to meet and develop a sense of community.

SO9 To seek the efficient use of existing infrastructure and services. Where necessary, the Council will facilitate the upgrading of existing infrastructure and services, or when required, the provision of new infrastructure and services, to facilitate development within the masterplan areas.

It is submitted that policy SO9 reflects the Council's intent to develop the masterplan areas. The proposed development represents an efficient use of zoned and serviceable lands with a residential density of 35 units per hectare. Please refer to DBFL Report under separate cover for details of Irish Water correspondence.

SO10 To promote and require the use of best practice urban design principles in all developments within the masterplan areas.

The proposed development has been designed and developed by a multi-disciplinary team. Please refer to the Architects Design Statement and Landscape Strategy under separate cover for full details of the design approach.

SO11 To promote and seek high quality standards of design in all new developments.

It is submitted that the proposed new neighbourhood is of high standard both in terms of its layout, detailed design and quality of materials.

Tactical Objectives: To help ensure the realisation of the strategic objectives, a series of tactical objectives are provided at section 5.2 of the TTEDP. According to the Development Plan, proposed developments within the masterplan areas will be assessed against these tactical objectives in addition to the policies and development criteria contained within the plan. In relation to housing, section 5.2.11 includes the following objectives-

H02. Residential development will be required to demonstrate a high quality of design and shall comprise a mix of dwelling sizes and types which accommodate a range of living requirements.

The proposed development of 349no. dwellings comprising 196no. houses and 153no. apartments of different size and design is fully in keeping with objective H02.

HO4. A variety of appropriately located densities should be provided within the masterplan lands. Each node must deliver an appropriate mix of densities to cater for a range of housing needs. These densities shall be specified in the individual masterplan that is required to be submitted for each node. The Planning Authority shall have regard to the current DoEHLG's guidelines on density when assessing masterplan applications for each node.

The proposed development has a net residential density of 35 dwellings per hectare. This is fully compliant with the recommendations of the Sustainable Residential development in Urban Areas, Guidelines for Planning Authorities (2009).

Section 5.2.1.3 relates to the creation of amenity space for new residents. The proposed development will comply with the following tactical objectives-

AU1. Accommodate the needs of new residents in the masterplan areas by providing new recreational and amenity spaces in tandem with the expansion of residential areas into the masterplan lands.

The new neighbourhood has been designed within a parkland setting. The provision of high quality amenity space is central to the proposed development.

AU3. Provide playgrounds in tandem with the residential development of each masterplan area so as to cater for the recreational and educational requirements of children resident in these areas.

Please refer to landscape drawings by Park Wood and the overall landscape strategy which provides details of playgrounds proposed. There is a play area proposed in the centre of Clonminch Square and two informal play areas within St. Columba's Green which are the two main public parks

4.2.3 DEVELOPMENT STRATEGY

The Development Strategy as contained in the TTEDP was amended by way of Variation No. 2 (2013) in recognition of the population targets contained in the Midlands Regional Planning Guidelines and the introduction of a Core Strategy into the Offaly County Development Plan 2014-2020. Variation No. 2 supersedes section 4.8 of the original TTEDP in terms of delivery of the projected population growth.

Chapter 5 contains an 'Overall Proposed Phasing Map of Masterplans' at page 8. Three phases are envisaged based on the sequential development of these lands as summarised in Table 5.2. The TTEDP states, that a certain degree of flexibility must be provided to reflect market demands (para. 5.3). This is not a Core Strategy Phasing Map.

The Core Strategy allows for the development of the Masterplan Areas within the lifetime of the TTEDP, should a viable and comprehensive proposal come forward (para. 1.1, Adopted Variation No.2). Section 3.1 of the Core Strategy states "Lands outside of Phase 1 of the master plan areas will not be considered under the lifetime of this plan". Variation No. 2 reduced the level of residential zoned sequence phase 1 lands to be released within the masterplan lands from 50% to 25%.

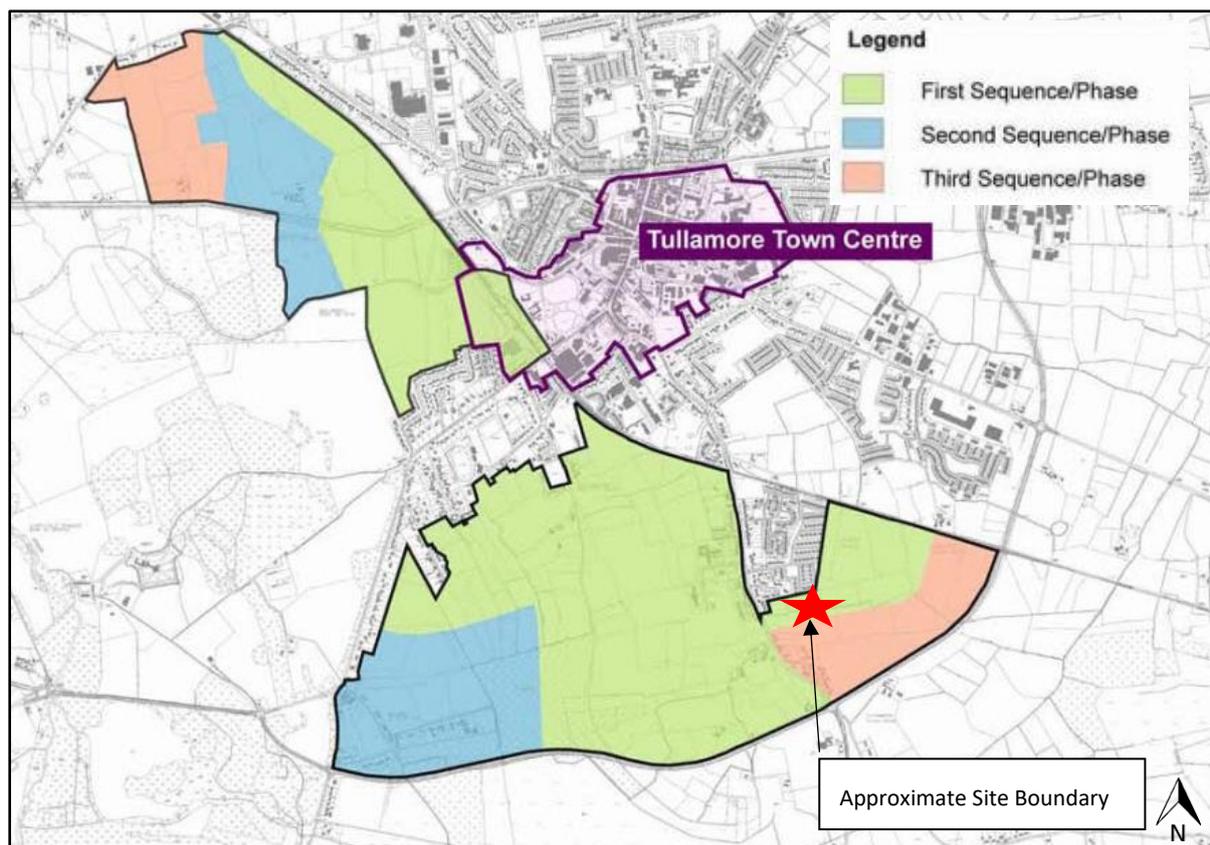


Figure 4.11: Extract from Chapter 5 Masterplan Lands Phasing Map

The subject lands represent Phase one of the Nodal Masterplan. The majority of the development area of c.11.45 hectares falls within the area shown as 'First Sequence/Phase' (7.95ha). Though the phasing/sequence map within Chapter 5 is at too small a scale to determine accurately, the southern part of the application site falls partly within lands shown as 'Third Sequence/Phase' (c.3.5ha). The reasons and considerations for including third sequence/phase lands within the development area relate to Land Ownership, efficient and viable construction of Road Infrastructure and Urban Design.

An Bord Pleanála in their Direction on ABP-307832-20 stated *"The Board noted that the proposed development includes lands identified as Phase 3 residential lands but noted that the plan allowed for flexibility and was satisfied that it would not contravene the provisions of the core strategy and would not materially contravene the development plan"*.

A statement of material contravention is submitted with this planning application under separate cover which addresses the release of phase 3 lands at this time.

4.2.4 RESIDENTIAL DEVELOPMENT

The TTEDP advocates the approach contained in the Sustainable Residential Development in Urban Areas Guidelines (2008) and the Urban Design Manual – Best Practice Guide (2008) to achieve high quality multi-unit residential developments.

Section 5 of this statement provides a detailed description of the proposed development and compliance with all Section 28 Guidelines. Development Management of the TTEDP and compliance with these requirements are set out at Section 4.2.8 of this Statement.

4.2.5 SCHOOL AND CHILDCARE FACILITIES

4.2.5.1 RESERVED SCHOOL SITE

According to the TTEDP, Central Government through the Department of Education and Skills is responsible for the delivery of educational facilities and services. Lands have been identified for the provision of schools in the future through the zoning objectives.

It is a specific objective of the TTEDP that the future development of the Eastern Node should provide for a primary level school and lands have been zoned Public/Community/Educational for the provision of this school. As illustrated by Park Hood Drawing 6473-L311 the future school site is provided for and the new alignment of the link street provides direct access to the school east of the application site.

An assessment of potential demand for school places generated by the development proposed is provided under separate cover. Taking account of the current capacity in Tullamore based on enrolment figures available from the Department of Education and Skills it is considered that the proposed development can be adequately catered for by the existing primary schools.

4.2.5.2 CHILDCARE

TTEP 11-05 It is the Councils' policy to encourage the provision of childcare facilities in residential areas, employment areas, retail centres and other areas as appropriate, when development proposals are put forward for consideration.

When assessing planning applications for childcare facilities, the Planning Authorities will have regard to the 'Childcare Facilities Guidelines for Planning Authorities', 2001. (para. 14.2.10).

In recognition of the benchmark contained in the Childcare Facility Guidelines and the potential for the proposed development to generate c.57no. children of pre-school age, it is proposed to construct a childcare facility that will cater for 100no. children in phase 1. While the crèche is provided with a private and secure play area to the rear of the building, it also has the advantage of being adjacent to Clonminch Square.



Figure 4.12: Play area located in Clonminch square – Extracted from Dwg. 6473-L-304

4.2.5.3 PLAY FACILITIES

- TTEP 11-04 It is the Council's policy that proposals for new developments will be encouraged to provide new facilities (including play facilities) for community use.

Both formal and informal play areas are identified on Park Hood Drawings. The neighbourhood centre offers the opportunity for community based facilities and business hub to locate at the centre of the new neighbourhood and adjacent to a public park.

4.2.6 BUILT AND NATURAL HERITAGE

According to Map 13.6 of the TTEDP 2010-2016 (as extended) the site is located in a landscape of low sensitivity. Furthermore, Map 13.1 represents the Council's proposed Natural Heritage Areas and the proposed development is not located in or adjacent to any of these areas. The site is currently in agricultural use and there are no recorded monuments or protected structures located within the site or adjacent to the site.

A tree survey was undertaken by Andrew Boe (BSc (Hons) MARBORA) and it was found that "from an amenity, arboriculture and landscape point of view the trees are not noteworthy" (BS5837 Tree Survey Report, October 2019, Pg. 3). The Development Plan mapping does not identify any trees or hedgerows of merit within the Eastern Node lands. Notwithstanding the above, the project landscape architect has identified some segments of hedgerow and some trees that would contribute to the development area and the Masterplan has been developed to incorporate these. A development impact drawing by Park Hood accompanies this request illustrating the information obtained from the tree survey and identifies trees/hedgerow to be retained or removed.

TTEP 13-03: *It is the Councils' policy to protect the integrity of Charleville Wood (proposed Natural Heritage Area (pNHA) and cSAC) and to cooperate with relevant government bodies and the landowner in the management of Charleville Wood and Estate.*

This application is accompanied by a Natura Impact Statement in order to assist An Bord Pleanála in carrying out an appropriate assessment. The NIS provides an examination, analysis and evaluation of the likely impacts from the project, both individually and in combination with other plans and projects, in view of best scientific knowledge and conservation objectives of the European Site concerned. It is submitted that on the basis of the information provided it can be concluded that the proposed development will not result in significant adverse effects to the integrity and conservation status of any European site and there is no reasonable scientific doubt as to that conclusion.

TTEP 12-11: *It is the Councils' policy to ensure that full consideration is given to the protection of archaeological heritage when undertaking, approving or authorising development, in order to avoid unnecessary conflict between development and the protection of the archaeological heritage.*

It is Council policy that archaeological heritage should be protected in any planned development. According to reports by Archer Heritage the application site and wider Masterplan area have a moderate-high possibility of having undiscovered archaeology. The application site has undergone geophysical survey and test trenching under license. A ploughed out fulacht fia was discovered within the north-west corner of the site. The Department in their submission dated 18th of December 2019 at pre-application stage (ABP_305919-19) recommended that the site recorded in situ and excavated. Extended test trench testing was undertaken in preparation of the full planning application which discovered a second fulacht fia which is also proposed to be recorded in situ and excavated. This approach was found to be acceptable by the Department in their submission dated the 10th of September on application ABP-307832-19.

4.2.7 TRANSPORTATION SERVICES AND INFRASTRUCTURE

The following policies relating to transportation apply to the proposed development-

TTEP 08-01: *It is the Councils' policy to locate land-uses, such as residential, schools, work and leisure areas closer together, without negatively impacting on the residential/public amenity of Tullamore. The purpose of this policy is to:*

- *Reduce the need to travel.*
- *Create more sustainable short distance travelling i.e. walking and cycling.*

The application site forms part of a larger Nodal Masterplan Area. The proposed development represents the first phase of development in the Eastern Node and will provide a neighbourhood centre, crèche and the first residential dwellings together with cycle tracks on Clonminch Road into Tullamore Town Centre. Within the Eastern Node there is also a reserved school site to the north of the proposed neighbourhood centre

The application site is contiguous to the existing urban area of Tullamore and provides for future connections to adjoining residential development and future development lands to increase permeability and access to the reserved school site, neighbourhood centre and crèche. The site layout proposed is DMURS compliant and will encourage cycling and walking by providing a safe environment where pedestrians have priority.

It is submitted that the proposal is fully compliant with policy TTEP 08-01.

TTEP 08-07: It is the Councils' policy to facilitate development of the masterplan areas by the creation of a network of local distributor routes, which connect these new areas to the existing town in a coherent plan led manner bringing permeability to the resultant urban fabric. These routes will be informed by the relevant masterplans and the Tullamore Transportation Study on its adoption.

The proposed development includes construction of the first section (c.550 metres) of the link street for the Eastern Node. This link street is based on a preliminary design for the Eastern Node which leads to Chancery Lane and includes a railway crossing (figure 4.10 above).

TTEP 08-08: It is the Councils' policy to facilitate the provision of the strategic links required to ensure the satisfactory implementation of the masterplans. These are shown marked A to R on Map 8.1 and outlined in sub-section 8.2.3.2.

The proposed development facilitates part of an identified strategic link within the Eastern Node (marked G-H on Map 8.1) from Chancery Lane (East) to N80/Clonminch.

The TTEDP was adopted prior to the publication of the Design Manual for Urban Roads and Streets (DMURS). As stated by the Offaly County Development Plan, new urban roads or reconfigured urban roads must be DMURS compliant. The strategic link road is designed as a Link Street and features fully segregated cycle tracks and full footpath connectivity.

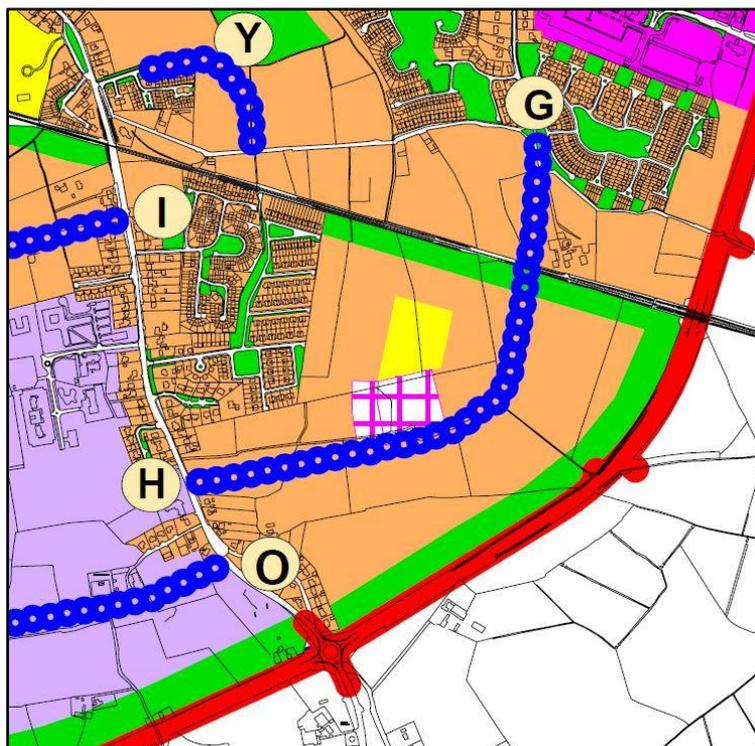


Figure 4.13: Extract from Map 8.1 Strategic Distributor Network and Linkages

4.2.8 DEVELOPMENT MANAGEMENT

Chapter 14 of the TTEDP outlines with Development Management requirements of the Plan. This section of the statement also has regard for the development management criteria of the Offaly County Development Plan being the overarching County Plan and providing detail where absent from the TTEDP.

4.2.8.1 DENSITY

The TTEDP looks to the Guidance contained in the Sustainable Residential Development in Urban Areas Guidelines (2009) to guide density in addition to the qualitative approach of the Urban Design Manual. Prevailing adjacent densities should also be taken into consideration (para. 14.2.1.2) but “no specific density standards are specified in this Plan” (para. 14.2.1.2).

The proposed development represents a density of 35 dwellings per hectare which is recognised as an efficient use of land by the Sustainable Residential Development in Urban Areas Guidelines (2009) for outer suburban/greenfield sites (para. 5.11). The proposed layout takes account of adjoining residential developments to the west and south west and aims to provide a variety of housing types. On this basis the proposed density is fully in keeping with the policies and objectives of the TTEDP.

As part of the Masterplan lands within Tullamore, the application site is affected by policies of Chapter 5. Tactical objective HO4 contained within Chapter 5 of the TTEDP seeks a variety of appropriately located densities to be provided within the masterplan lands and that these densities shall be specified in the individual masterplan that is required to be submitted for each node.

Para.5.4.4.5 of Chapter 15 states “the northern and eastern portions of the Eastern Node will be developed for medium density residential development prior to the development of the western and south sections of this node for medium and low density housing”. **There is no definition of what is considered low or medium density.**

The Nodal Masterplan prepared for the Eastern Node encourages a residential density of 35 dwellings per hectare in keeping with Section 28 Guidelines and the overall policy of the Development Plan. It is submitted that the proposed development is fully in keeping with policy of the TTEDP in terms of residential density.

4.2.8.2 BUILDING HEIGHT

There are no specific policies contained in the Tullamore Town and Environs Development Plan 2010-2016 relating to height outside the town centre of Tullamore. Chapter 5 outlines the objectives within Masterplan Lands where tactical objective UD2 encourages appropriate height, scale, massing and density. Specifically:

- Relate in scale to adjoining buildings where appropriate.
- Relate to plot ratio and site coverage standards where appropriate.
- Protect local and strategic views and vistas.
- Protect neighbouring amenity to an appropriate level.

The proposed development responds to its adjoining context, keeping heights between 2-3 storeys along the perimeter of the site and protecting existing and future residential amenity. The application site is not affected by strategic views or vistas and is relatively featureless. The proposed development will create visual interest and attractive views through design, the parkland setting and placement of artwork.

4.2.8.3 PUBLIC OPEN SPACE

The Planning Authority requires a standard of 80m² of public open space per dwelling with a minimum of 15% of the total application site to be provided as public open space (para. 14.2.1.5).

The total area of public open space proposed equates to 16% of the residential site area and has been designed by qualified and experienced landscape architects Park Hood to ensure a high quality environment it achieved. All residents are within 150m of a public open space.

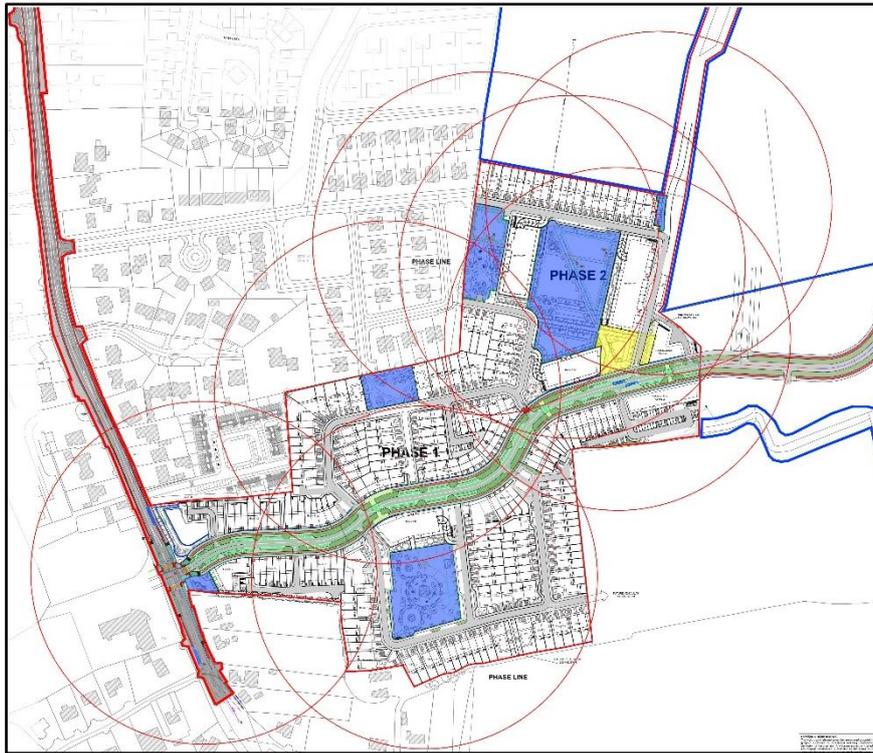


Figure 4.14: Extract from Park Hood Drawing illustrating 150m walking radius from public open space

4.2.8.4 PRIVATE OPEN SPACE - HOUSES

Paragraph 14.2.1.7 outlines that all houses (terraced, semi-detached and detached) shall have an area of private open space behind the building line of at least 60-75m² for 3-5 bedroom houses and no less than 48m² in the case of 1 and 2 bedroom houses.

All rear garden areas meet and exceed this standard.

4.2.8.5 PRIVATE OPEN SPACE - APARTMENTS

In the case of apartment and duplex schemes, the TTEDP requires private open space to be provided in the form of landscaped areas, courtyards, terraces/patios and balconies. Roof gardens could also be considered. There is conflict within the TTEDP regarding to the provision of private open space for apartments. Section 14.2.1.21 states “*planning applications for apartments shall be assessed against the ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’, 2007 by DoEHLG*”. The TTEDP acknowledges the Guidelines include standards in relation to communal and private open space, however, section 14.2.1.7 of the TTEDP states “*normally, a minimum of 20m² of private open space or garden area for each bed space in flats/apartments shall be provided*”.

The quantitative standards of the TTEDP, have been superseded by the 2020 edition of 'Sustainable Urban Housing: Design Standards for New Apartments'. These Guidelines have been issued by the Minister for Housing, Planning and Local Government under Section 28 of the Planning and Development Act 2000 (as amended). Planning Authorities and An Bord Pleanála area required to have regard to the guidelines and are also required to apply any specific planning policy requirements of the Guidelines (para. 1.19 of Guidelines). This includes standards in relation to communal and private open space.

The apartments proposed development are designed in line with the Sustainable Urban Housing: Design Standards for New Apartments (2020). Ground floor apartments feature small gardens/terraces while upper floor apartments have private balconies. Details on private open space for apartments proposed is contained at Section 5.2 and Appendix A of this Statement. It is submitted that the provision of private open space in compliance with Section 28 Guidelines is fully justified. The provision of private open space at the rate stated in the TTEDP is unrealistic and would have a detrimental impact on the design of apartment buildings leading to a loss of daylight and sunlight to residents.

4.2.8.4 SEPARATION DISTANCES

Paragraph 14.2.1.9 outlines the requirement for space around buildings. Generally a minimum distance of 2.5metres for single storey and 3metres for two-storey buildings will be required to be maintained between the side walls of adjacent dwelling or dwelling blocks each having a minimum of 1 metre from the dwelling to the boundary.

According to the TTEDP, the rear garden area should have a minimum depth of 11 metres. In the event of high quality design being achieved these standards may be relaxed. In general there should be a distance of 22 metres between opposing first floor windows.

This standard has been achieved.

4.2.8.5 BOUNDARY TREATMENTS

Paragraph 14.2.10 provides no specific requirements with regard to rear gardens boundary treatment. The Plan states that where concrete block walls are permitted they should be plastered, suitably painted and capped.

Park Hood Drawing no. 6473-L-309 details the proposed boundary treatments. In summary, rear garden boundaries will be separated with 1.8m timber fence while metal railings are proposed along the front boundaries. Rear garden boundaries consist of a combination of treatments including 2m high block wall and concrete post and panel fencing. Fencing is proposed in order to maintain the existing hedgerows along the site boundaries. Where walls are proposed in the public realm they are brick faced and capped as required.

4.2.8.6 BIN STORAGE AND RECYCLING

In accordance with the TTEDP, each house shall have adequate storage for three no. wheeled bins, screened where necessary (para.14.2.1.7). The majority of houses have rear access to a private garden area where bins can be stored. Where terraced housing does not have rear access, bin storage is integrated into the design of the boundary treatment to the front of the house to improve its appearance.



Figure 4.15: 3-D image of bin storage in front of terraced housing

The TTEDP does not provide specific guidance on provision of bin storage for apartments but paragraph 8.6.10 of the County Plan states that “*shared bin storage shall be located conveniently for the residents of the development and collection service providers*”.

The proposed apartments have been designed in accordance with the Sustainable Urban Housing: Design Standards for New Apartments (2020). Architect drawing no. 1757-PA-007 indicates the position of bin storage areas for the apartments and these are also indicated in detail on floor plans. All bin storage areas are located conveniently for the residents.

The TTEDP states that, if necessary and appropriate, provision shall be made for ‘bring centres’ in large-scale developments of 100 units or greater (para. 10.2.3.2 & para. 14.2.1.18).

It is submitted that the neighbourhood centre building to the south of the link street offers a central location in which to locate a bring centre for the Eastern Node in the future.

4.2.8.7 CAR PARKING AND CYCLE PARKING

General Car parking: Car parking requirements are set out at Section 14.2.15.1 (Table 14.2) of the Tullamore Town and Environs Development Plan. The application site must comply with the standard as set for 'outside the town centre' which reflects the standard as set by Table 8.2 of the Offaly County Plan.

Residential - Housing: A detailed examination of car parking provision is contained in the TTA by DBFL Consulting Engineers under separate cover. The Development Plan standard of 2 car parking spaces per house has been met. In order to avoid a dominance of car parking, this is provided in a mixture of in-curtilage parking (71%) and on street car parking. the provision of car parking courtyards also reduces the visual impact of surface car parking taking it 'off-street'.

Residential – Apartments: Car parking provision for apartments meets with the Sustainable House Guidelines: Design Standards for New Apartments (2020), providing an average of 1.25 spaces per apartment, 76% of which is provided at basement level beneath apartment buildings B, D, E and G. Policy TTEP 08-25 of the TTEDP "*It is the Councils' policy to apply car-parking requirement standards to all new developments in the town in accordance with Chapter 14: Development Standards.*" According to Table 14.2 of the TTEDP, an apartment should be provided with 2 spaces per unit. It is submitted that regard should be had to the Section 28 Guidelines relating to apartment design in the assessment of the proposed development.

Childcare Facility: 21no. car parking spaces are allocated to the crèche. This parking allowance provides mainly for staff at the childcare facility as it is expected that most residents will walk/cycle to the crèche from within the development. The set down area is accessed from the Link Street but separated from the main carriageway to ensure safe drop off/pick up and prevents the road being blocked at busy times. According to Table 14.2 of the TTEDP, car parking for a childcare facility should be provided at a rate of 1 space per employee and 1 space per 4 children. It is not possible to know how many staff will be employed at the proposed childcare facility until an end user has established a service. Based on the number of children the crèche has been designed to accommodate, 25no. car parking spaces would be required in addition to staff parking if Table 14.2 was to be followed. It is submitted that the car parking provided is sufficient for staff and facilitating drop off/collection as detailed in the report by DBFL Consulting Engineers under separate cover

Local Shop and Neighbourhood Centre: On-street car parking spaces have been allocated to the local shop which are located on the link street. The majority of car parking for the neighbourhood centre buildings is located to the south of Building No. 2 (54no. spaces) with the balance provided on-street.

Mobility Impaired Parking- Both the TTEDP and OCDP state that provision should be made for persons with disabilities but no set standard is provided. Policy TTEP 08-20 of the TTEDP states that car parking for disabled persons should be in accordance with ‘Building for everyone’ published in 2002. The mobility impaired parking standard recommended in Section 5.4.1 of “Buildings for Everyone” has been provided for the apartment and duplex units which are served by on street parking. All parking is conveniently located to the front door or main access in the case of apartment buildings and overlooked for passive surveillance. All other residents will have in-curtilage parking.

Cycle Parking – There is no standard cycle parking requirement contained in the TTEDP. Section 8.16.3 of the OCDP states that cycle parking should be provided in new residential developments at a rate of one third of the number of car spaces, subject to a minimum of one stand.

A total of 315no. bicycle parking spaces are proposed to serve the development. This is mainly for the apartments units that do not have access to a rear garden area and for visitors. Dedicated cycle parking is also provided at the crèche and neighbourhood centre buildings. The location of the proposed cycle spaces is illustrated by architect drawing no. 1757-PA-007.

Electric Vehicles- Section 18.16.4 of the OCDP contains the Council’s policies on Electric Vehicle parking. The Plan states that it is “Council and National policy that all residential parking spaces including parking spaces for the disabled, shall be constructed to be capable of accommodating future charging points as required - residential space facilities to be coded/metered, slow charging 220-240V, 13A single phase” (Pg. 220). Non-residential developments are required to provide facilities for battery operated cars to be recharged at a rate of 10% of the total car parking spaces.

It is proposed to provide ducting for electrical vehicle charging points for all shared parking areas with 10% of spaces provided with charging points. Individual houses can avail of private power supply for vehicle charging.

4.2.8.8 PHASING

The TTEDP requires a phasing programme for large/medium sized housing developments (para. 14.2.1.13). It is proposed to develop the site in two phases as detailed above by Section 2.4 and Table 2.10 of this Statement and illustrated by Van Dijk Architects drawing number 1757-PA-027. Sub-phasing is provided for Phase 1 to ensure a mix of house types is provided together with adequate public open space and childcare services.

4.2.8.9 ENERGY, PUBLIC LIGHTING AND SERVICES

Energy efficiency: The Council encourage the use of renewable energy systems and consideration of orientation in housing design.

The proposed developments will be constructed to comply with NZEB. An assessment of the proposal and compliance with Part L forms part of the Building Lifecycle Report under separate cover.

Public Lighting: The TTEDP requirements with regard to lighting are contained at para. 14.2.22.

A public lighting plan is submitted as part of the application package undertaken by Morley Walsh.

Sustainable Urban Drainage Systems: Policy TTEDP 10-13 of the Plan restricts the permitted surface water run-off from all new developments to Greenfield rates. It is the policy of the Council that all new developments within Tullamore provide SUDS.

The surface water run-off from the proposed development will be restricted to Greenfield rates. Further detail on the SUDS methods that will be employed on site can be found in the accompanying Infrastructure Report by DBFL.

Cables & Servicing: Paragraph 14.2.23 of the TTEDP requires all cables and services to be located underground.

There are a number of ESB lines that transverse the application site. These will be undergrounded as part of the site development works. It is intended that ducting for EV charging will be provided as part of the proposed development. These are indicated on the drawing by Morley Walsh.

5.0 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH SECTION 28 MINISTERIAL GUIDANCE

The Department of Housing, Planning, Community and Local Government has published several guidelines relating to the government's vision for housing and the promotion of sustainable urban housing, including:

- Sustainable Residential Development in Urban Areas' (2009) with an associated 'Best Practice Urban Design Manual',
- Sustainable Urban Housing: Design Standards for New Apartments (2020).
- Urban Development and Building Heights, Guidelines for Planning Authorities (December, 2018)
- The Design Manual for Urban Roads and Streets (2013)
- Appropriate Assessment of Plans and Projects – Guidance for Planning Authorities (2009)
- Childcare Facilities, Guidelines for Planning Authorities (2001)
- The Planning System and Flood Risk Management

This Section of the statement will outline how the proposal with these policy documents.

5.1 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE GUIDELINES FOR AUTHORITIES – SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS (CITIES, TOWNS & VILLAGES (2009)

The 2009 Sustainable Residential Development in Urban Areas Guidelines and accompanying Urban Design Manual contains a set of guidelines and parameters aimed at creating high quality, sustainable and lasting new residential areas. Some of the key objectives of these Guidelines can be summarised as follows:

- Prioritise walking, cycling and public transport and minimise dependence on the private car.
- Deliver a high quality of life in terms of amenity, safety and convenience.
- Promote social integration
- Promote efficient use of land and energy.
- Provide a mix of land uses to minimise transport demand.

Section 4 of the Guidelines contains recommendations and guidelines for the creation of sustainable residential areas. A sustainability checklist is set out at the end of Section 4. The following section demonstrate how the proposed development complies with the items on this checklist.

5.1.1 SUSTAINABILITY CHECKLIST

Are the lands proposed for development in accordance with the sequencing priorities set out in the Development Plan or Local Area Plan?

The application site is zoned for Residential development and is subject to a Masterplan which has been prepared and is submitted with this planning application under separate cover. The majority of the application site is located on first sequence/phase Masterplan lands permitted to be released within the lifetime of the current Development Plan. Part of the application site falls within Masterplan lands identified for release in the third sequence/phase. The Board in their Direction on case ABP307832-20, stated the Development Plan allows for sufficient flexibility *“and was satisfied that it would not contravene the provisions of the core strategy and would not materially contravene the development plan”* (Note 2) to release these lands. However, a statement of material contravention is included with this planning application fully justifying the release of third sequence/phase masterplan lands as part of the proposed SHD.

Is there capacity in existing schools to support the proposed development?

Yes. Capacity information is not available from the Department of Education and Skills which only provides information on enrolment figures, which does not necessarily reflect maximum capacity. A comparison of enrolment figures has been undertaken to gauge capacity of the schools in Tullamore. Enrolment figures for Tullamore are detailed above by Table 2.2. It is submitted that based on the current enrolments and major expansion works planned at existing schools there will be capacity to support the proposed development.

Is there an appropriate range of community and support facilities available to serve the site?

A community audit has been undertaken and is included at Section 2.2 of this Statement. This audit identifies that there are retail services and community facilities within a 1.5km radius of the site including supermarkets, schools and employment opportunities. The proposed development has been design to be self-reliant and promote more sustainable modes of transport other than the private car. Housing will be developed alongside supporting land uses including a childcare facility, local shop and neighbourhood centre uses.

Is there adequate public transport to serve the development?

The application is serviced by a local bus route on the Clonminch Road that provides access to the train station, town centre and nearby Retail Centre to the east. As detailed in this Statement, the train station provides regular services to Dublin, Galway and Westport. The bus station is located next to the train station providing onward connection to Portlaoise, Mullingar, Birr and Dublin. It is submitted that the critical mass the proposal will provide would encourage the extension of the local bus route into the Eastern Node and support investment in existing services. Two additional bus stops are provided for on Clonminch Road as part of the proposed SHD and the link street is designed to be fully accessible by regular bus services. The cycle scheme included in the proposed SHD safely links these transport options to residents by bicycle.

Will the development prioritise sustainable transport modes?

Yes. The proposed development is DMURS compliant with segregated cycle tracks provided throughout the development and a network of green spaces form an attractive route though the site for pedestrians. The preliminary alignment illustrated at Figure 4.10 of this statement ensures full connectivity throughout the Eastern Node and potential for connection over the railway line in the future. Future pedestrian only connections are also provided for to existing residential areas as well as onward connections to surrounding development lands. Roads and services will be brought to the site boundaries. The provision of cycle tracks from the application site to Tullamore Town Centre not only makes cycling a realistic mode of transport for future residents but offers a significant planning gain for existing residents.

Will the development ensure accessibility for everyone including people with disabilities?

Yes. The proposed development will be constructed in compliance with Part M. In addition, the project architects have used principles of Universal Design to help futureproof housing for changing needs.

Will the development ensure more efficient use of energy?

Yes. The dwellings are to be constructed in compliance with NZEB. An energy assessment forms part of the Building Lifecycle Report under separate cover.

Will the development include the right quality and quantity of open space?

Yes. The proposed development has been designed in tandem with qualified and experienced landscape architects Park Hood. The layout provides for a hierarchy of public open space in addition to private open space for houses and communal gardens for apartments. The total public open space provided represents 16% of the site area.

Will the development include measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood?

Yes. The proposed development is DMURS compliant and a Traffic and Transport Assessment has been undertaken by DBFL Consulting Engineers. All public open spaces and streets are well supervised with no blank facades or gable ends fronting on to the public road. Houses are designed to turn corners and provide active street frontage. The apartment buildings have a strong urban edge with regular entrances enhancing street activity along the building edges.

Present an attractive and well maintained appearance

Yes. The proposed development has been designed by a team of award winning architects. A building lifecycle report has been undertaken as part of the planning application package and materials proposed will require minimum maintenance and provide a simple palette that will remain attractive into the future. The Nodal Masterplan will ensure there is a seamless transition between development areas.

Will the development promote social integration?

Yes. The proposed development is bound to the north by existing residential development and a recently approved Part 8 development by Offaly County Council to house the elderly. In addition, it is proposed to comply with Part V by providing housing on site. It is submitted the mix of housing proposed also allows for full social integration by providing for many life stages. The neighbourhood centre uses, crèche and public open space will also encourage social integration.

Will development protect and where possible enhance the built and natural heritage?

Yes. The application site and wider Nodal Masterplan lands are not located within a sensitive landscape. There are no protected structures within the application site or in close proximity to it. There are no recorded monuments and archaeological testing has not uncovered features of interest apart from two fulacht fia. While located at some distance from SPA, SAC and NHA's, the proposal has undergone appropriate assessment screening and this planning application is accompanied by a Natura Impact Statement due to the hydrological pathway identified. Where possible and appropriate existing hedgerows and trees have been incorporated into the layout of the application site as illustrated by the Development Impact drawing by Park Hood.

Provision for Sustainable Urban Drainage System

Yes. As detailed in the Infrastructure Report by DBFL Consulting Engineers, the proposed development uses SUDS including over ground attenuation areas.

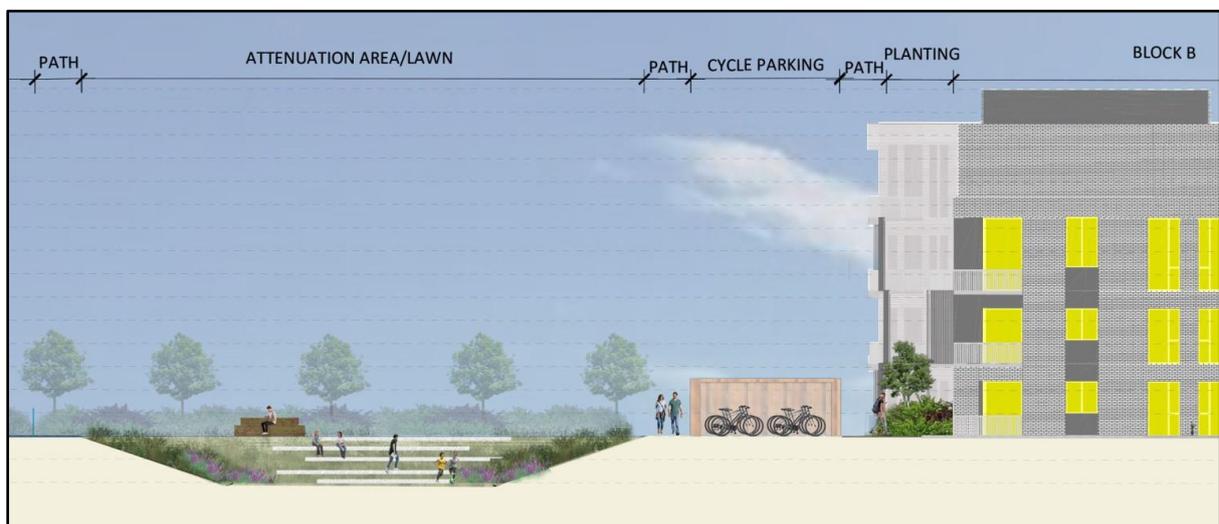


Figure 5.1: Cross section by Park Hood illustrating attenuation area (Drawing no. 6473-L-310)

5.1.2 URBAN DESIGN MANUAL

The companion document to the Sustainable Residential Development in Urban Areas Guidelines, the Urban Design Manual, identifies 12 essential criteria against which all new residential development against a range and scale of locations will be assessed. These criteria include *Context, Connections, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Privacy and Amenity, Parking and Detailed Design*. The Architects Design Statement by Van Dijk Architects under separate cover provides a detailed description of the design evaluation and evaluates the proposal with regard to the 12 core principles. A summary of the proposal’s compliance with the Urban Design Manual is provided below-

Scale	Policy Issue	Objectives	Proposed Development
Neighbourhood Area 	Context	To promote places that are locally distinctive having regard to their setting and context.	The application site forms part of a wider neighbourhood known as the Eastern Node for which a Nodal Masterplan has been undertaken. The Masterplan and proposed layout take full account of the context as informed by baseline studies and surveys in areas and having regard to existing residential development. The Nodal Masterplan provides a design guide and principles to achieve a new neighbourhood with a clear identify including focal points, art work and a parkland setting. The area is adjacent to a major employment development area.
	Connectivity	To promote places that allow for ease of movement, permeability and integration.	The application site will be accessed via Clonminch Road. Provision has been made for future pedestrian only links with Clonminch Wood to improve permeability and future access to the school site and neighbourhood centre. The layout is DMURS compliant, facilitating safe movement of both pedestrians and cyclists through the site. In keeping with the principles of Master planning, all routes are designed to be continued into adjoining lands beyond the application site in the future. There is a high degree

	<p>Distinctiveness</p>	<p>To promote places that build upon existing site assets, have a clear identity, are legible and easy to navigate.</p>	<p>The application site and Eastern Node has no defining features and is relatively flat. The layout proposed is intended to be clearly legible with the architecture providing a new and distinctive neighbourhood area. Artwork is proposed at focal points throughout the development (Park Hood Drawing 6473-L-304). The crèche and neighbourhood buildings are three storey in height and clearly identifiable so as to assist in legibility of the new neighbourhood. There is a strong urban frontage onto the link street clearly defining its status and function.</p>
	<p>Layout</p>	<p>To promote places with layouts, streets and spaces that are people friendly.</p>	<p>The proposed development has been designed as a place for people with the private car of least importance. Full footpath and cycle connectivity will be provided within the site and to Tullamore Town Centre with provision for onward connection throughout the Eastern Node Masterplan in the future. The layout has been designed to highlight vistas, provide a sense of enclosure using three storey house types along the link street and higher apartment buildings within the site where the context allows them to be successfully absorbed. The high quality parkland setting provides opportunities for meeting and developing a sense of community.</p>
	<p>Public realm</p>	<p>To promote public spaces that have vitality, are safe and secure, attractive and accessible to all.</p>	<p>Public open spaces are located in proximity to the dwellings and are safely connected with strong urban edges and active street frontage for passive surveillance. The design of the main public spaces is an integrated element in the design of the new neighbourhood and wider Nodal Masterplan Area.</p>

<p>Buildings</p> 	Adaptability	To promote places that are designed to be adaptable through time.	The proposed apartments are designed to meet and exceed the minimum requirements as set by the Sustainable Urban Housing: Design Standards for New Apartments. Housing can be extended to the rear without interfering with the streetscape. The mix of dwelling types including bungalows allows for different life stages so people could move to a different property to suit changing needs while staying within their neighbourhood.
	Privacy and Amenity	To promote the design of buildings that provide good standards of privacy and amenity.	The proposed development protects the privacy of the existing residential developments to the west and northwest of the application site. The proposed layout is fully compliant with development management requirements relating to separation distances and space around dwellings. As detailed by an example at figures 2.12 above, house designs respond to their context.
	Parking	To promote the integration of car parking in the urban environment in a way that is well located, secure and attractive.	Parking for the houses is largely located in curtilage and at basement level for apartments the car parking as well as on street. Grouped parking areas are all overlooked to ensure safety and located close to the main entrances of dwellings/apartment buildings. On street parking is softened with landscaping.
	Detailed Design	The design of the building should make a positive contribution to the locality.	The proposed development has been designed by a team of qualified architects with an emphasis on landscape quality provided by Park Hood and DMURS compliance as assessed by DBFL Consulting Engineers. The buildings are of modern design and fully in keeping with Planning Policy in terms of height, density and development management standards. A varied palette of materials and architectural styles will provide visual interest and an attractive streetscape.

Table 5.1 – 12 Key Principles of Urban Design

5.2 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH GUIDELINES FOR PLANNING AUTHORITIES – SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS (2020)

As outlined above at Section 3.1.1 of this statement, the NPF aims to secure more compact and sustainable urban development. The Guidelines aim to ensure that apartment living is an attractive and desirable housing option to encourage greater delivery of apartments in Ireland's cities and towns and other appropriate locations. This is seen as key in providing for the long-term move towards smaller average household size, an ageing and more diverse population.

According to the Guidelines, *“Demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type. The 2016 Census also indicates that, if the number of 1-2 person dwellings is compared to the number of 1-2 person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2 person households as there are 1-2 person homes.”* (para.2.6)

According to the Guidelines, in general terms, apartments are most appropriately located within urban areas with the scale and extend of apartment development increasing in relation to proximity to core urban centre and other factors including proximity to public transport and employment centres. While the Guidelines recognise that the identification of the types of location in cities and towns that may be subject to local determination by the Planning Authority, the Guidelines provide a broad description of proximity and accessibility considerations that can be applied with regard to apartment location. In terms of apartments, the subject site in Tullamore can be considered as follows (para. 2.4, p.6)-

“Peripheral and/or less accessible urban locations

Such locations are generally suitable for limited, very small scale, higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:

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

The Guidelines recognise that while apartments may not be required below the 45 dwellings per hectare net density threshold, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density. Accordingly, apartments may be considered as part of a mix of housing types in a given housing development at any urban location, including suburbs, towns and villages”.

According to the 2016 Census, just 8% of households living in Tullamore recorded as living in apartments/flats. The proposed development is fully in keeping with the locational criteria outlined by the Guidelines. Apartments including duplex units represent 44% of the total mix, providing variety and flexibility to create a community with a mix of tenures and age groups.

5.2.1 REQUIRED MINIMUM STANDARDS

APARTMENT DESIGN STANDARDS		
Policy	Standard / Requirement	Assessment against the proposed development
<i>Apartment Mix</i> (SPPR1)	Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms.	One bedroom apartments represent 27% of the 153no. apartments proposed.
<i>Apartment Mix</i> (Para. 3.5-3.7)	The Guidelines make provision for a two bedroom apartment to accommodate 3 persons to allow for social housing and to provide necessary variation in dwelling size. It is recommended that no more than 10% of the total number of units in any private residential development comprise this category.	All two bedroom apartments proposed have been designed to accommodate four persons.
<i>Safeguarding standards</i> <i>high</i> (Para 3.8)	The majority of all apartments in a proposed scheme of 10 or more must exceed the min. floor area standard by a minimum of 10%.	Based on the proposed mix of apartments, the minimum floor area required would be 10,242m ² . The total gross floor area for the proposed apartments amounts to 11,558.30m ² which is 1,316m ² or 13% above the minimum required. See Appendix A of this statement for detailed breakdown. 58% of apartments proposed are at least 10% larger than the minimum overall apartment floor area required.

Policy	Standard / Requirement	Assessment against the proposed development
<i>Dual Aspect</i> <i>(SPP4)</i>	In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme	72% of apartments are at least dual aspect.
<i>Floor to Ceiling Height</i> <i>(SPP5)</i>	Min floor to ceiling height must accord with Building Regulations requirement of 2.4m, except in relation to ground floor apartments, where it should be greater. It is a specific planning policy requirement that ground level apartment floor to ceiling heights shall be a minimum of 2.7m.	The proposed floor to ceiling heights at ground floor level and above are a minimum of 2.75m metres.
<i>Lift and Stair Cores</i> <i>(SPP6)</i>	Up to 12 apartments per floor per individual stair/lift core may be provided in apartment schemes.	There are a maximum of 7 apartments per lift core in Blocks B and G. Block D and E have a maximum of 6 apartments per floor/life core. Block A, C have a lift/stair core serving a maximum of 3 apartments per floor while the lift/stair core in block F serves only 2 apartment on the upper floors.
<i>Internal Storage</i> <i>(Para. 3.31)</i>	No individual storage room within an apartment should exceed 3.5 square metres.	This is complied with.
<i>Private Amenity Space</i> <i>(Para's 3.35 – 3.39)</i>	Private amenity space shall be provided in the form of gardens or patios/terraces for all apartments and balconies at upper levels. A minimum depth of 1.5 metres is required for balconies. Minimum areas for private amenity space for apartments are set out at Appendix 1.	All apartments have private amenity areas in the form of ground floor patios or balconies on upper floors. The depth of balconies exceeds the 1.5 metre minimum depth. Please refer to schedule at Appendix A for details or private amenity space provision for each apartment.

Policy	Standard / Requirement	Assessment against the proposed development
<p><i>Security Considerations</i> (Para's 3.40 - 3.42)</p>	<p>Blocks & buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, & overlooked by adjoining dwellings.</p>	<p>The design of the proposed apartments complies with all security considerations. Entrances are clearly defined and overlooked.</p>
<p><i>Refuse Storage</i> (Para. 4.8)</p>	<p>Refuse facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage.</p>	<p>Kitchen areas within apartments provide adequate space to store refuse temporarily. Communal refuse storage areas are located in proximity to main entrances as illustrated by drawing no. 1757-PA-007 and floor plans. The refused storage areas have been designed in conjunction with AWN who prepared the operational waste management plan contained in the EIAR under separate cover.</p>
<p><i>Communal Amenity Space</i> (Para's 4.10 - 4.12)</p>	<p>Space should be accessible, secure & usable. There should be a distinction from private amenity space. Minimum areas for communal amenity space for apartments are set out at Appendix 1.</p>	<p>Communal open space is highlighted on architect drawing no. 1757-PA-007. These areas consist mostly of hard landscaped areas with formal seating that adjoin public open space areas where possible. Calculations are provided in Appendix A.</p>
<p><i>Children's Play</i> (Para's 4.13-4.14)</p>	<p>The recreational needs of children must be considered as part of communal amenity space within apartment schemes. Children's play needs around the apartment building should be catered for.</p>	<p>Play areas are provided throughout the application site in keeping with the landscape masterplan prepared by Park Hood Landscape Architects.</p>
<p><i>Car Parking</i> (Para's 4.18 – 4.20)</p>	<p>The default policy is for car parking to be minimised and substantially reduced in central & accessible urban locations.</p>	<p>The application site is regarded as peripheral/less accessible. Car parking is provided at an average of 1.25 spaces per apartment.</p>

Policy	Standard / Requirement	Assessment against the proposed development
<p><i>Bicycle parking and storage</i></p> <p><i>(Para's 4.15 – 4.17)</i></p>	<p>Directly accessible from public road. Of permanent construction & secure design, preferably within the building footprint or where not possible, adjoining the structure.</p> <p>A minimum of 1 cycle storage space per bedroom shall be applied including studio units. Visitor provision of 1 space per 2 apartments (flexibility allowed).</p>	<p>Bicycle parking is directly accessible from the public road. Buildings B and G have internal bicycle storage in addition to surface cycle parking. The location of bicycle parking is highlighted by drawing no. 1757-PA-007. A total of 315 cycle spaces are proposed across the application site with 237 cycle spaces allocated to the proposed apartments. This represents an average of 1.5 cycle spaces per unit.</p>
<p><i>Content of Planning Applications</i></p> <p><i>(Para's 6.1-6.3)</i></p>	<p>A schedule must be submitted that details the number and type of apartments and associated individual unit floor areas, private amenity space and internal (and any external) storage space.</p>	<p>Please find schedule attached at Appendix A</p>
<p><i>Para. 6.2</i></p>	<p>Identify the proposed apartments that are at least 10% greater than the minimum floor area standard in schemes with 100 or more apartments.</p>	<p>As detailed by the table attached at Appendix A, all apartments exceed minimum floor area standards with 88no. (58%) exceeding the minimum floor area standard by at least 10%</p>

Table 5.2 – Compliance with the Sustainable Urban Housing: Design Standards for Apartments (2020)

5.3 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE GUIDELINES FOR PLANNING AUTHORITIES – URBAN DEVELOPMENT AND BUILDING HEIGHT (2018)

The above Guidelines were published in response to the National Policies to secure compact sustainable forms of development in the National Planning Framework and the long term capital investment framework under the 10-year National Development Plan. The Guidelines signal a move away from a “business as usual” approach that has resulted in unsustainable development patterns and move towards growing our towns and cities upwards, not just outwards.

These guidelines therefore set out national planning policy that:

- Expand on the requirements of the National Planning Framework; and
- Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations.

The Strategic Planning Policy Requirements (SPPRs) contained in the Guidelines take precedence over any conflicting policies including Development Plans. The Guidelines require that buildings heights of at least three to four storeys must be supported in principle (para. 1.9). It is recognised that the suburban edges of towns and cities now typically include town-houses (2-3 storeys), duplexes (2-3 storeys) and apartments (4 storeys upwards) achieving medium densities in the range of 35-50 dwellings per hectare. The Guidelines highlight several advantages to this form of residential development-

- Such developments address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends while at the same time providing for the larger 3, 4 or more bedroom homes.
- They provide a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer time without necessitating relocation.
- These forms of developments benefit from using traditional construction methods, which can enhance viability.
- This form of development can facilitate the development of an attractive street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood, passive surveillance and community.

The proposed development achieves a density of 35 dwellings per hectare. Increased height is used to create strong urban edges, provide enclosure and define new public open spaces successfully without negatively impacting on existing low density development to the north and west. This is achieved by tapering the height at transitional areas.

The Guidelines outline the Development Management process for building height in suburban/edge locations from section 3.4. It is acknowledged that newer housing developments outside town centres and inner suburbs i.e. the suburban edges of towns typically not include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards). It is recognised that such developments address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more bedroom homes delivering medium densities, in the range of 35-50 dwellings per hectare net. There are additional benefits to this type of development including a variety of building typologies, enabling households to meet changing accommodation requirements over longer periods of time without necessitating relocation and they have the benefit of using traditional construction methods which can enhance viability.

The Guidelines state “development should include an effective mix of 2, 3 and 4-storey development which integrates well into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets” (para. 3.6).

It is submitted that the development proposed is fully in keeping with the development management criteria as outlined by the Guidelines for greenfield suburban edges of towns and has been used to effectively create an attractive urban neighbourhood. Building height at the entrance to the application site and future Eastern Node is used to create a gateway by popping the buildings up to three storey at the junction and stepping down to two storey at the site boundaries. Building height has been used to create a good sense of enclosure along the link street with taller apartments (maximum 4 storey) addressing large public parks providing a strong sense of urban neighbourhood and passive surveillance. Building height is also used to clearly define the beginning of the commercial core with neighbourhood centre buildings 3 storey in height. The connective street pattern is fully DMURS compliant.

Shadow analysis indicate that the minimal increase in shading to surrounding residential development will not affect residential amenity. This is achieved due to the separation distances achieved and modest increases in building heights within the application site.

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:*

1. 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 proposed SHD of 349no. dwellings in a mix of 196no. houses and 153no. apartments provides an appropriate mix of unit types that achieves an efficient density of 35 dwellings per hectare in keeping with the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities. We note the content of Circular Letter NRUP 02/2021 which addresses residential densities in towns and villages. It is considered that given the existing and projected population of Tullamore, a Key Town and the largest urban area in County Offaly, the density proposed is appropriate.

5.4 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH DESIGN MANUAL FOR URBAN ROADS AND STREETS (2013, UPDATED 2019)

The principal tenet of the 2013 *Design Manual for Urban Roads and Streets* is to put well-designed streets at the heart of sustainable communities. The Guidelines aim to promote real alternatives to car journeys and encourage lower vehicle speeds in urban areas with a view making streets safer.



Figure 5.2: Road Hierarchy

Access to the development and internal access roads serving proposed apartments have been designed in accordance with DMURS standards. In keeping with the general principles of DMURS, the internal road network serving the development incorporates speed reduction measures such as raised tables at junctions and home zones in order to limit vehicles speeds to prioritise residential areas for pedestrians and to incentivise walking and cycling. All roads are wide enough to accommodate access by refuse vehicles and other similar vehicles with turning heads provided where necessary.

5.5 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE GUIDELINES FOR PLANNING AUTHORITIES – CHILDCARE FACILITIES (2001)

Since the Guidelines came into effect in 2001, some eighteen years ago, it is now widely acknowledged that in order for purpose-built childcare facilities to operate viably and successfully there needs to be a defined need and critical mass to support them. All too often it has been the case that purpose-built facilities provided in accordance with the Guidelines have not been taken up by childcare providers either because the development itself does not generate sufficient demand or there is already adequate provision in the area.

By reference to Circular Letter PL 3-2016 issued by the Department of Environment, Community and Local Government dated 31st of March 2016, it is noted the Department is considering revising the 2001 Childcare Guidelines. This is acknowledged in the recently published Sustainable Urban Housing: Design Guidelines for New Apartments which state;

*Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of **one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units**, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.”*

The proposed childcare facility has been designed in accordance with the benchmark of one child-care facility for every 75 dwellings as provided by the Guidelines for Childcare Facilities. This was considered appropriate given the mix of dwelling sizes proposed which includes three and four bedroom houses and the geographical distribution of existing childcare facilities in Tullamore. The childcare facility has been located in phase 1.

5.6 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE GUIDELINES FOR PLANNING AUTHORITIES – APPROPRIATE ASSESSMENT OF PLANS AND PROJECTS IN IRELAND (2009, REVISED 2010)

With the introduction of the Birds Directive in 1979 and the Habitats Directive in 1992 came the obligation to establish the Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the EU. In Ireland, the Natura 2000 network of European sites comprises Special Areas of Conservation (SACs, including candidate SACs), and Special Protection Areas (SPAs, including proposed SPAs). The obligation to undertake appropriate assessment derives from Article 6(3) and 6(4) of the Habitats Directive, and both involve a number of steps and tests that need to be applied in sequential order.

A Natura Impact Statement is submitted under separate cover in order to assist An Bord Pleanála in carrying out an appropriate assessment. The NIS provides an examination, analysis and evaluation of the likely impacts from the project, both individually and in combination with other plans and projects, in view of best scientific knowledge and conservation objectives of the European Site concerned. It is submitted that on the basis of the information provided it can be concluded that the proposed development will not result in significant adverse effects to the integrity and conservation status of any European site and there is no reasonable scientific doubt as to that conclusion.

5.7 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE GUIDELINES FOR PLANNING AUTHORITIES – PLANNING SYSTEM AND FLOOD RISK MANAGEMENT (2009)

The Planning System and Flood Risk Management Guidelines recommend a precautionary approach when considering flood risk management in the planning system.

A site specific flood risk assessment has been undertaken by DBFL Consulting Engineers and is submitted under separate cover. The application site is considered to be located in Flood Zone C which is suitable for residential development.

APPENDIX A – APARTMENT DESIGN STANDARDS – QUALITY ASSESSMENTS

Communal Amenity Space

Block A	Total No. of Units	Type	Unit No.	No. of Units	No.
					Bedrooms
13		2B/4P	X1	3	2
		2B/4P	X2	3	
		2B/4P	X3	3	
		2B/4P	X4	2	
		2B/4P	X5	2	

2B/4P = 7 sqm Communal amenity space
13 x 7 sqm = 91 sqm

91 sqm	Required
125 sqm	Proposed

Block B	Total No. of Units	Type	Unit No.	No. of Units	No.
					Bedrooms
24		1B/2P	W1	1	1
		2B/4P	X1	1	2
		2B/4P	X2	3	2
		2B/4P	X3	3	2
		2B/4P	X4	7	2
		2B/4P	X5	4	2
		2B/4P	X6	2	2
		3B/6P	Y1	3	3

1B/2P = 5 sqm Communal amenity space
2B/4P = 7 sqm Communal amenity space
3B/6P = 9 sqm Communal amenity space

1 x 5 sqm = 5 sqm
18 x 7 sqm = 126 sqm
3 x 9 sqm = 27 sqm
Total = 158 sqm

158 sqm	Required
202 sqm	Proposed

Block C	Total No. of Units	Type	Unit No.	No. of Units	No.
					Bedrooms
8		2B/4P	X1	3	2
		2B/4P	X2	3	
		2B/4P	X3	2	

2B/4P = 7 sqm Communal amenity space

8 x 7 sqm = 56 sqm

56 sqm	Required
146 sqm	Proposed

Block D	Total No. of Units	Type	Unit No.	No. of Units	No.
					Bedrooms
28		1B/2P	W1	2	1
		1B/2P	W2	8	1
		2B/4P	X1	2	2
		2B/4P	X2	4	2
		2B/4P	X3	2	2
		2B/4P	X4	2	2
		2B/4P	X5	2	2
		2B/4P	X6	1	2
		2B/4P	X7	1	2
		2B/4P	X8	1	2
		3B/6P	Y1	1	3
		3B/6P	Y2	1	3
		3B/6P	Y3	1	3

1B/2P = 5 sqm Communal amenity space
2B/4P = 7 sqm Communal amenity space
3B/6P = 9 sqm Communal amenity space

10 x 5 sqm = 50 sqm
15 x 7 sqm = 105 sqm
3 x 9 sqm = 27 sqm
Total = 182 sqm

185 sqm	Required
202 sqm	Proposed

Block E	Total No. of Units	Type	Unit No.	No. of Units	No.
					Bedrooms
51		1B/2P	W1	18	1
		1B/2P	W2	9	1
		1B/2P	W3	2	1
		2B/4P	X1	3	2
		2B/4P	X2	12	2
		2B/4P	X3	3	2
		3B/6P	Y1	2	3
		3B/6P	Y2	2	3

1B/2P = 5 sqm Communal amenity space
2B/4P = 7 sqm Communal amenity space
3B/6P = 9 sqm Communal amenity space

29 x 5 sqm = 145 sqm
18 x 7 sqm = 126 sqm
4 x 9 sqm = 36 sqm
Total = 307 sqm

307 sqm	Required
331 sqm	Proposed

Block F	Total No. of Units	Type	Unit No.	No. of Units	No.
					Bedrooms
5		2B/4P	X1	2	2
		3B/6P	X2	3	3

2B/4P = 7 sqm Communal amenity space
3B/6P = 9 sqm Communal amenity space

2 x 7 sqm = 14 sqm
3 x 9 sqm = 27 sqm
Total = 41 sqm

41 sqm	Required
101 sqm	Proposed

Block G	Total No. of Units	Type	Unit No.	No. of Units	No.
					Bedrooms
24		1B/2P	W1	1	1
		2B/4P	X1	1	2
		2B/4P	X2	3	2
		2B/4P	X3	3	2
		2B/4P	X4	9	2
		2B/4P	X5	4	2
2B/4P	X6	3	2		

1B/2P = 5 sqm Communal amenity space
2B/4P = 7 sqm Communal amenity space

1 x 5 sqm = 5 sqm
23 x 7 sqm = 161 sqm
Total = 166 sqm

166 sqm	Required
293sq.m	Proposed

Block A	Total No. of Units	Type	Unit No.	No. of Units	No.	Floor Area		Floor Area Total	Living/Kitchen/Dining Area		Bed1	Bed2	Bed3	Aggregate Bed Area*		Storage Area*		Private Open Space		Aspect	
						Bedrooms	Proposed		Min	Proposed				Min	Proposed	Min	Proposed	Min	Proposed		Min
13	2B/4P	X1	3	2		73.2	73	219.6	30	30	11.4	13		24.4	24.4	6	6	9.46	7	Triple	
	2B/4P	X2	3			73.9	73	221.7	32.7	30	11.4	13		24.4	24.4	6.24	6	15.88	7	Single	
	2B/4P	X3	3			74.2	73	222.6	32	30	11.4	13		24.4	24.4	6.14	6	13.89	7	Single	
	2B/4P	X4	2			74.2	73	148.4	30.9	30	11.4	13		24.4	24.4	6.15	6	9.69	7	Single	
	2B/4P	X5	2			73.1	73	146.2	30	30	11.4	13		24.4	24.4	6.13	6	7.23	7	Triple	
								958.5													

Block B	Total No. of Units	Type	Unit No.	No. of Units	No.	Floor Area		Floor Area Total	Living/Kitchen/Dining Area		Bed1	Bed2	Bed3	Aggregate Bed Area*		Storage Area*		Private Open Space		Aspect	
						Bedrooms	Proposed		Min	Proposed				Min	Proposed	Min	Proposed	Min	Proposed		Min
24	1B/2P	W1	1	1		62.9	45	62.9	33.5	23	14.1			14.1	11.4	3	3	12.9	5	Single	
	2B/4P	X1	1	2		83.5	73	83.5	30	30	13	13		26	24.4	6	6	25	6	Dual	
	2B/4P	X2	3	2		79.6	73	238.8	31.3	30	13.1	12		25.1	24.4	6	6	16.1	6	Dual	
	2B/4P	X3	3	2		85.8	73	257.4	35.7	30	13.9	11.4		25.3	24.4	6	6	10.6	6	Dual	
	2B/4P	X4	7	2		74	73	518	30	30	13.8	11.4		25.2	24.4	6	6	8	6	Single	
	2B/4P	X5	4	2		94.6	73	378.4	31.3	30	19	13.8		32.8	24.4	8.2	6	13.6	6	Dual	
	2B/4P	X6	2	2		77.6	73	155.2	30.1	30	17.4	11.4		28.8	24.4	6	6	12.9	6	Single	
	3B/6P	Y1	3	3		115.7	95	347.1	36.8	34	18.8	17.7	12.3	48.8	31.5	10.8	9	25	9	Dual	
								2041.3													

Block C	Total No. of Units	Type	Unit No.	No. of Units	No.	Floor Area		Floor Area Total	Living/Kitchen/Dining Area		Bed1	Bed2	Bed3	Aggregate Bed Area*		Storage Area*		Private Open Space		Aspect	
						Bedrooms	Proposed		Min	Proposed				Min	Proposed	Min	Proposed	Min	Proposed		Min
8	2B/4P	X1	3	2		75	73	225	30.5	30	13	11.4		24.4	24.4	6	6	8.1	7	Triple	
	2B/4P	X2	3			77	73	231	30	30	13	11.7		24.7	24.4	6.8	6	9.6	7	Dual	
	2B/4P	X3	2			80	73	160	30	30	15	11.4		26.4	24.4	6.2	6	7.3	7	Dual	
								616													

Block D	Total No. of Units	Type	Unit No.	No. of Units	No.	Floor Area		Floor Area Total	Living/Kitchen/Dining Area		Bed1	Bed2	Bed3	Aggregate Bed Area*		Storage Area*		Private Open Space		Aspect	
						Bedrooms	Proposed		Min	Proposed				Min	Proposed	Min	Proposed	Min	Proposed		Min
28	1B/2P	W1	2	1		49.5	45	99	22.7	23	12.3			12.3	11.4	4.14	3	6.77	5	Single	
	1B/2P	W2	8	1		53	45	424	24.4	23	12.3			12.3	11.4	4.3	3	11.71	5	Single	
	2B/4P	X1	2	2		86	73	172	37.5	30	13.2	11.4		24.6	24.4	6.88	6	9.8	6	Dual	
	2B/4P	X2	4	2		78	73	312	30.4	30	13.1	11.2		24.3	24.4	6.05	6	9.67	6	Dual	
	2B/4P	X3	2	2		78.5	73	157	30.6	30	13.6	11.3		24.9	24.4	6.04	6	8.76	6	Single	
	2B/4P	X4	2	2		84.2	73	168.4	30.7	30	14.3	13.1		27.4	24.4	6.14	6	9.72	6	Dual	
	2B/4P	X5	2	2		81.2	73	162.4	30.3	30	14.1	12.8		26.9	24.4	6	6	8.8	6	Dual	
	2B/4P	X6	1	2		100	73	100	39	30	15.5	13.8		29.3	24.4	11.9	6	34.76	6	Dual	
	2B/4P	X7	1	2		91	73	91	36.3	30	13.3	12.8		26.1	24.4	10.61	6	37.7	6	Dual	
	2B/4P	X8	1	2		75	73	75	29.5	30	13.9	10.2		24.1	24.4	5.79	6	8.88	6	Dual	
	3B/6P	Y1	1	3		109.4	90	109.4	37.9	34	14.8	13.9	12.2	40.9	31.5	9.4	9	142.5	9	Triple	
	3B/6P	Y2	1	3		116.4	90	116.4	39.1	34	15.7	13.5	12.6	41.8	31.5	13.2	9	34.9	9	Dual	
	3B/6P	Y3	1	3		101.1	90	101.1	36.5	34	15.2	13.3	10.8	39.3	31.5	9.25	9	18.5	9	Dual	
								2087.7													

Block E	Total No. of Units	Type	Unit No.	No. of Units	No.	Floor Area		Floor Area Total	Living/Kitchen/Dining Area		Bed1	Bed2	Bed3	Aggregate Bed Area*		Storage Area*		Private Open Space		Aspect	
						Bedrooms	Proposed		Min	Proposed				Min	Proposed	Min	Proposed	Min	Proposed		Min
51	1B/2P	W1	18	1		53	45	954	24.4	23	12.3			12.3	11.4	4.36	3	11.71	5	Single	
	1B/2P	W2	9	1		49.5	45	445.5	23	23	12.3			12.3	11.4	4.14	3	6.77	5	Single	
	1B/2P	W3	2	1		55.2	45	110.4	25.2	23	11.6			11.6	11.4	3.2	3	20	5	Single	
	2B/4P	X1	3	2		81.2	73	243.6	30.3	30	14.1	12.8		26.9	24.4	6	6	8.8	6	Dual	
	2B/4P	X2	12	2		78	73	936	30.4	30	13.1	11.9		25	24.4	6.05	6	9.67	6	Dual	
	2B/4P	X3	3	2		86	73	258	37.5	30	13.2	11.4		24.6	24.4	6.88	6	9.8	6	Dual	
	3B/6P	Y1	2	3		110	95	220	36.3	34	14.2	13.3	13.3	40.8	31.5	10.9	9	80	9	Triple	
	3B/6P	Y2	2	3		115.5	95	231	36.3	34	14.9	14.9	14.2	44	31.5	10.9	9	80	9	Dual	
									3398.5												

Block F	Total No. of Units	Type	Unit No.	No. of Units	No.	Floor Area		Floor Area Total	Living/Kitchen/Dining Area		Bed1	Bed2	Bed3	Aggregate Bed Area*		Storage Area*		Private Open Space		Aspect	
						Bedrooms	Proposed		Min	Proposed				Min	Proposed	Min	Proposed	Min	Proposed		Min
5	2B/4P	X1	2	2		79	73	158	32	30	13	11.6		24.6	24.4	7.5	6	8	7	Triple	
	3B/6P	X2	3	3		106	90	318	36	34	15.65	11.9	11.62	39	31.5	9	9	9	9	Dual	
								476													

Block G	Total No. of Units	Type	Unit No.	No. of Units	No.	Floor Area		Floor Area Total	Living/Kitchen/Dining Area		Bed1	Bed2	Bed3	Aggregate Bed Area*		Storage Area*		Private Open Space		Aspect	
						Bedrooms	Proposed		Min	Proposed				Min	Proposed	Min	Proposed	Min	Proposed		Min
24	1B/2P	W1	1	1		51	45	51	24.1	23	13.8			13.8	11.4	3	3	8	5	Single	
	2B/4P	X1	1	2		79.3	73	79.3	31	30	13	12.8		25.8	24.4	6	6	24.4	6	Dual	
	2B/4P	X2	3	2		79.6	73	238.8	31.3	30	13.1	12		25.1	24.4	6	6	16.1	6	Dual	
	2B/4P	X3	3	2		85.8	73	257.4	35.7	30	13.9	11.4		25.3	24.4	6	6	10.6	6	Dual	
	2B/4P	X4	9	2		74	73	666	30.1	30	13.8	11.4		25.2	24.4	6	6	10	6	Single	
	2B/4P	X5	4	2		94.7	73	378.8	31.3	30	18.9	13.8		32.7	24.4	8.2	6	12.9	6	Dual	
2B/4P	X6	3	2		103	73	309	31	30	16.8	13		29.8	24.4	15.2	6	24.2	6	Dual		
								1980.3													

3b	13
2b	99
1b	41
	153

Total 11558.3

Aspect Ratio	
Triple	11
Dual	99
Single	43

Total Apartments