

Scott Hobbs Planning

Planning Statement on behalf of:

John Flanagan Development Ltd

Date:

24 April 2023

Wellwood, Ardan / Puttaghan, Tullamore

LRD Compliance Statement

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LRD Application for residential and associated development:

Wellwood, Tullamore

LRD Compliance Statement

The Statement supports the application for large scale residential development at Wellwood. Offaly County Council issued its formal Opinion regarding the LRD Pre-application submission on 25 November 2022, having determined that the submitted information 'does not constitute a reasonable basis on which to make an application for permission for the proposed LRD' but indicated the required information. It also requested that if an application were submitted that 'a statement of response to the issues raised in this LRD Written opinion' be included with the application. This LRD Compliance Statement addresses all points raised in that Opinion and demonstrates that the proposal complies with policy and is in accordance with the proper planning and sustainable development of the area.



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1.0 Introduction



- 1.1 This LRD Compliance Statement addresses the matters raised by Offaly County Council (OCC) in its formal LRD Opinion written in response to the LRD pre-application submission. Each point is provided in full in the table below, with summary commentary regarding the Applicants response to the issue and the source of the information is stated. Those documents should be cross referenced as they provide the required information and evidence to support the proposal.
- 1.2 Column 5 (Plan Ref No / Report) cross refers to the submitted Plan, Drawing and Report Schedule and to reference numbers attributed to each submitted document, for ease of reference.


2.0 OCC Written Opinion : LRD Response

2.1 Development

DMS	OCC Opinion	Applicant Comment	Compliance with Policy and LRD Opinion?	Plan Ref No / Report [Refer to Plan and Drawing Schedule]
<p>DMS-02 DENSITY: The appropriate residential density of a site shall be determined with reference to:</p> <ul style="list-style-type: none"> • Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009) and the accompanying Urban Design Manual (2009); • Sustainable Urban Housing: Design Standards for New Apartments 2020; and • the Urban Development and Building Heights Guidelines 2018; • the prevailing scale and pattern of development in the area. 	<p>Residential density of the development areas of the site is 37 (See submitted schedule of accommodation 18037).</p> <p>This is deemed acceptable. It is noted that differing house types and house heights in accordance with the recommendations of the Urban Development and Building Heights Guidelines are proposed.</p>	<p>It is noted that OCC deemed the density, differing housing types and heights to be acceptable. The proposal has evolved to address other matters raised by OCC but the overall density, housing type and heights has been retained.</p>		<p>See Plan and Drawing Schedule, ref nos D3, D4, Design & Access Statements (R2) and Planning Statement (R5) and Architects Visualisations (R14)</p>


<p>DMS-03 LAYOUT: The layout of a new residential development shall be designed to achieve the following:</p> <ul style="list-style-type: none"> • A strong sense of identity and a sense of place; • Permeable layouts, with multiple connections to adjoining sites/estates for pedestrians and cyclists; • A good sense of enclosure; • Active frontage and supervised spaces; • All new developments should be designed to comply with Design Manual for Urban Roads and Streets, (2013 as updated in 2019) and the complementary publication The Treatment of Transition Zones to Towns and Villages on National Roads by Transport Infrastructure Ireland) in relation to the design and use of urban roads and streets; and • High quality green infrastructure provision and linkages. 	<p>Colour photomontages of the entire development taken from a variety of aerial angles are required for the proposed development and it is noted that the submitted MCORM statement indicates that this will be submitted as part of the planning application.</p> <p>Regarding permeable layouts the submitted proposed site layout drawing PL002 is unclear as to whether a pedestrian link into Harbour walk is proposed between houses 55 and 27. This may require the consent of Tullamore MD Area Office if Harbour Walk has been taken in charge. It is noted that an existing timber gate is present but the boundary treatment requires upgrading. The provision of a gateless pedestrian access is advised. A pedestrian link in proximity to house No 28 of Harbour Drive is also recommended.</p> <p>Site Boundary treatment keeping the existing mature trees to the North of house no 28-24 in Harbour Drive is deemed advisable.</p> <p>The entrance area outside the site but leading into Thornsberry Estate requires upgrading by the applicant.</p>	<p>CGIs have been developed following final design freeze and accompany the application.</p> <p>A pedestrian link is provided between houses 55 and 27 Harbour Walk into the POS3, boundary treatment is enhanced. Mature trees have not been retained due to health. The entrance to Thornsberry Estate will be upgraded.</p>		<p>See Plan Schedule, including plan ref nos D3, D4, D7, D110-D13, . Design Statement (R2), Access Statement (R3), Planning Statement (R5), landscaping plan and Landscaping Strategy R8), Landscaping Plans (D55-D59), strategy ref , and Architects Visualisations (R14)</p>
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<p>DMS-04 Design of Streets: Applications for residential development shall ensure adherence to the design criteria set out in the:</p> <ul style="list-style-type: none"> • Design Manual for Urban Roads and Streets (2013 as updated in 2019) and the complementary publication The Treatment of Transition Zones to Towns and Villages on National Roads by Transport Infrastructure Ireland which provide guidance in relation to the integrated design of roads and streets with a speed limit of 60 km per hour or less in towns and villages, and present a series of principles, approaches and standards that are necessary to create safe and successful residential streets as places; and • Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government's Permeability Best Practice Guide (2015), which deals with permeability, connectivity and legibility. 	<p>Please see report below from Tullamore MD</p>	<p>See below</p>		<p>See Transport sections</p>
<p>DMS-05 Housing Mix: The Planning Authority requires all applications for residential development of 10 houses or more to contain a mix of house types, heights and sizes unless it can be demonstrated that there is a need for a particular type of unit and the proposed development meets the need. Apartments, duplexes, terraces, semi-detached, detached, people with disabilities and learning disabilities and older persons housing shall all be considered as possible elements of a housing mix.</p>	<p>A satisfactory mixture of house types are proposed.</p>	<p>The scheme has evolved to address matters raised in the response and the general mix of housing types has been retained.</p>		<p>See plan schedule, D3, D4, D14- D32, R2, R4,R14.</p>

<p>DMS-06 Life Long Adaptability: Applications for all housing developments of 5 houses or more shall be accompanied by an Access Statement carried out in accordance with Appendix 6 of Buildings for Everyone: A Universal Design Approach (National Disability Authority, 2012).</p>	<p>Access statements has not been provided.</p>	<p>Access Statement including as a supporting document</p>		<p>See Plan Schedule and R2, R3</p>
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<p>DMS-07 Design Statement: A detailed design statement shall be prepared by professionals with expertise in areas such as architecture, urban design, landscape architecture and sustainable travel for residential developments in excess of 10 residential units in urban areas. The design statement shall:</p> <ul style="list-style-type: none"> • Explain the design principles and design concept. Demonstrate how the twelve urban design criteria as per the Urban Design Manual - A Best Practice Guide (2009) have been taken into account when designing schemes in urban areas. Each of the twelve criteria is of equal importance and has to be considered in an integrated manner; • Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan or masterplan affecting the site; • Include photographs of the site and its surroundings. Include other illustrations such as photomontages, perspectives, sketches; • Ensure the scale of the proposed development is reflective of the settlement tier and character of the existing built environment; • Show consideration of retaining and integrating existing important natural and man-made features; • Outline detailed proposals for open space and ensure the provision of open space is designed in from the earliest stage of scheme layout design; • Outline a detailed high quality open space and landscape design plan including 	<p>An Architectural design statement addressing the criteria as per the Urban Design Manual has been provided but it should explicitly indicate where it addresses the 12 criteria/questions.</p> <p>Details on how Green Infrastructure integrates into the scheme has not been provided. It is also noted that the front boundary of the adjoining lands in the applicants ownership to the North of the site, adjoining Tyrrells Road has an unkempt appearance. This boundary may require setting back and the applicant may wish to consider upgrading the boundary treatment.</p>	<p>A Design & Access Statement is included in the application pack and addresses the 12 criteria.</p> <p>Improved boundary landscaping proposed, as detailed in the Landscape Statement.</p>		<p>See Plan Schedule, R2, R3, R8, R14</p>
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<p>specifications, prepared by suitably qualified professionals;</p> <ul style="list-style-type: none"> • Outline how Green Infrastructure integrates into the scheme; and <p>Show how the proposed development complies with the Design Manual for Urban Roads and Streets (DMURs), 2013 (as updated in 2019) and the complementary publication The Treatment of Transition Zones to Towns and Villages on National Roads by Transport Infrastructure Ireland in relation to street network, movement and place, permeability and legibility.</p>				
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<p>DMS-08 Apartments: Applications for apartment developments will be assessed having regard to the qualitative and quantitative standards contained within the Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities (2020), Quality Housing for Sustainable Communities (2007) and Sustainable Residential Development in Urban Areas (2009) or any subsequent revisions thereafter in these Guidelines, in relation to:</p> <ul style="list-style-type: none"> • Location; • Appropriate mix; • Floor areas and room widths; • Dual aspect; • Floor to ceiling height; • Lift/stair access; • Storage provision (for general, refuse and bulky items); • Private and communal amenity space and playgrounds; • Security; • Communal facilities; • Car and bicycle parking; and • Adaptability. <p>The design of new apartments should encourage a wider demographic profile which actively includes families with and without children, professionals and older people in both independent and assisted living settings.</p> <p>All applications should contain a Schedule of how the proposed apartments comply with the minimum required floor areas and standards contained in Appendix 1 of Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).</p>	<p>A housing quality assessment table has been submitted.</p> <p>However in accordance with 6.1 of Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020) <u>a separate schedule is required for each separate apartment unit</u> in accordance with appendix A of the guidelines setting out for each proposed apartment the “Required minimum Floor Area and Standard” and that which is proposed.</p> <p>Please note that a single table for “Minimum floor areas for communal amenity space” should be submitted for the entire apartment development and this does not need to be address in the individual schedules.</p> <p>Please have regard to SPPR 3 requirement of 10% increase in floor areas in accordance with section 3.8 and 3.12 of the Guidelines when setting out this schedule.</p> <p>Please indicate in the schedule the number of dual aspect units proposed and orientation of single aspect units having regard to SPPR 5.</p> <p>The schedule shall indicate which apartments are served by which core, and how many apartments each cores services, which should not exceed 12.</p> <p>The schedule should indicate the minimum internal floor height of proposed units to be</p>	<p>Full HQI submitted as part of application package and supports submitted drawings.</p>		<p>See Plan Schedule, R4 and R4a, R2</p>
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<p>The following Specific Planning Policy Requirements from Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020) shall be adhered to for apartment developments;</p> <p>SPPR 1: 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.</p> <p>SPPR 2: For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:</p> <ul style="list-style-type: none"> • Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studiotype units; • Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th; • For schemes of 50 or more units, SPPR 1 shall apply to the entire development. <p>SPPR 3: Minimum Apartment Floor Areas:</p> <ul style="list-style-type: none"> • Studio apartment (1 person) 37 m² • 1-bedroom apartment (2 persons) 45 m² • 2-bedroom apartment (4 persons) 73 m² • 3-bedroom apartment (5 persons) 90 m² 	<p>supported by drawings, having regard to SPPR 5.</p>			
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<p>SPPR 4: In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</p> <p>A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate;</p> <ul style="list-style-type: none"> • 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; • For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects. <p>SPPR 5: Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</p> <p>SPPR 6: A maximum of 12 apartments per floor per stair/lift core may be provided in apartment schemes. This maximum provision may be</p>				
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<p>increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , subject to overall design quality and compliance with building regulations.</p>				
<p>DMS-11 Corner Site Development: New corner site development shall have regard to:</p> <ul style="list-style-type: none"> • Size, design, layout, relationship with adjacent properties; • Impact on the amenities of neighbouring residents; • The existing building line and roof profile of adjoining dwellings; • The character of adjacent buildings to create a sense of harmony; • The provision of active street frontages and dual frontage development in order to avoid blank facades and maximise surveillance of the public domain; • Side/gable and rear access/maintenance space; and • Level of visual harmony, including external finishes and colours. 	<p>Noted that satisfactory use of dual frontage units are proposed.</p>	<p>It is noted that OCC consider the use of dual frontage as acceptable. The scheme has evolved to accommodate other matters raised by OCC but in accordance with the approach regarding dual frontage.</p>		<p>See Plan Schedule, ref nos D3, D4, D10-33, R2, R4</p>
<p>DMS-13 Separation Distances/Overlooking: A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall be observed but may be relaxed in village and town centre locations where high quality design is achieved and where alternative provision has been designed to ensure privacy</p>	<p>This has been provided.</p>	<p>The minimum separation is provided.</p>		<p>See Plan Schedule, ref nos D3, D4, D10-33, R2, R4</p>

<p>DMS-14 Space around Buildings: A minimum distance of 2.5m for single storey, and 3m for two-storey buildings will be required to be maintained between the side walls of adjacent dwellings or dwelling blocks with each building having a minimum of 1 metre to the boundary. This standard may be relaxed where the dwelling incorporates a single storey structure to the side.</p>	<p>It would appear from an inspection of Site Layout Plan drawing PL002 that only 2 metres has been provided.</p>	<p>The scheme has evolved and the required separation is now provided. Some small changes have been necessary to the layout and mix, but without affecting the overall character of the proposal.</p>		<p>See Plan Schedule, ref nos D3, D4, D10-33, R2, R4</p>
<p>DMS-16 Refuse Storage and Bins: All new residential schemes where a communal refuse storage area is proposed shall ensure that the bin storage areas;</p> <ul style="list-style-type: none"> • Are located in convenient locations easily accessible by all residences; • Are located within 50 metres of all residences within the development but not located immediately adjacent to the front door or ground floor windows of residences; • Are well screened from public view and ventilated; and • Make provision for waste segregation and recycling for residences. 	<p>The applicant has indicated that details relating to bin storage will be provided</p>	<p>Bin storage provide in accordance with requirements</p>		<p>See Plan Schedule, ref nos R2, D26</p>



<p>DMS-17 Landscaping and Boundary Treatment: Landscaping and boundary treatment plans shall be submitted for residential development which include;</p> <ul style="list-style-type: none"> Planting schemes consisting of local native plant types and semi mature trees from the list contained in Table 4.16 in Chapter 4 of Volume 1 of this Plan; Where sites contain mature trees and/or substantial hedgerows, a detailed tree and hedgerow survey shall be required clearly outlining the extent of what is to be retained and replaced. Any existing mature trees shall be protected during site development works and incorporated into the overall development design; A coherent treatment for the boundaries of individual sites throughout a residential development; In general, unless front gardens are stipulated open plan on planning application drawings, front boundaries shall be defined by capped walls or fences of a maximum height of 0.5 metres high in keeping with the house design. Mature hedging is also acceptable as a front boundary; Side boundaries of rear gardens 1.8 metres to 2 metres in height and shall be formed by concrete block walls rendered and capped in a manner acceptable to the Council or concrete post and rail fencing. Privacy strips to the front of residential development in town and village centres providing a buffer clearly defining the private domain and public realm and streets will be encouraged. 	<p>Details on landscaping have been provided however I note that details for site boundary and individual house boundary treatments are required. I note in particular the site boundary to the North of Block A is very exposed and proposals for extensive creeping plants on this wall and all other exposed boundary walls is required. Details of existing site boundary and proposed boundary treatments are required. Front boundaries of housing may be defined by low box hedging.</p> <p>Details of heavy landscaping treatments between the proposed site and houses 28-24 Harbour Drive and 47-50 Harbour Walk are required.</p> <p>Details of heavy landscaping treatments at the end of Cul de sac adjoining houses 12 and 13 Harbour Drive is required.</p>	<p>Full landscaping proposals and strategy prepared and submitted with the application documents and includes enhanced boundary treatment at Block A and other exposed walls; boundary treatments; and between the site and adjacent housing particularly at 28-24 Harbour Drive, 47-50 Harbour Walk and adjoining houses 12 and 13 Harbour Drive. Consultation has been held with local residents regarding the proposed details of development, the residents preferences have been included within the proposed landscaping and boundary treatment detail, where possible and appropriate to the proper planning of the area.</p>		<p>See Plan Schedule, ref D55-D59 and R8</p>
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<p>DMS-18 Private Open Space Minimum Standards for Houses:</p> <p><i>Unit Type: Minimum Requirement:</i></p> <p>One bedroom 48 m²</p> <p>Two bedroom 55 m²</p> <p>Three bedroom 60m²</p> <p>Four bedrooms+ 75 m²</p>	<p>A site layout map indicated the size of each garden space has been provided. A legend indicated the number of bedrooms of each house type, to clearly indicate compliance with the above policy, is required.</p>	<p>Private open space ranges between min. 55 sq m and min 75 sq m, as required. This is shown on the HQA</p>		<p>See Plan Schedule, ref nos D7, R2, R4, R4a, R8, D55, D56</p>
<p>DMS-19 Private Open Space Minimum Standards for Apartments: The following minimum standards from Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020) (or any subsequent revisions to these Guidelines thereafter) shall apply;</p> <p><i>Unit Type: Minimum Requirement:</i></p> <p>Studio 4 m²</p> <p>One bedroom 5 m²</p> <p>Two bedrooms (3 person) 6 m²</p> <p>Two bedrooms (4 person) 7 m²</p> <p>Three bedrooms 9 m²</p>	<p>The schedule requested under DMS-8 should address this issue.</p>	<p>Private open space ranges between min 5 sq m and min 6 sq m, but the plans show provision in accordance with requirements. This is shown on the SOA</p>		<p>See Plan Schedule, ref nos D7, R2, R4, R4a, R8, D55, D56</p>

<p>DMS-21 Public Open Space: Public open space shall be provided in a residential development as follows:</p> <ul style="list-style-type: none"> • In greenfield sites, the minimum area of public open space that shall be provided is 15% of the total site area; • In brownfield sites or large infill sites, the minimum area of public open space that shall be provided is 10% of the total site area; • In greenfield sites, public open space shall be provided within 150 metres walking distance of every house in a new residential development; • Public Open Space shall be integrated into the overall development and shall be appropriately located where it can be overlooked and all play areas supervised by surrounding residential development. Public open space shall not be positioned to the side or back of houses; • Areas with high gradients, areas liable to flooding or areas where infrastructure is located or otherwise impractical to function effectively as open space will not be acceptable for consideration as useable open space; • Narrow tracts of land (less than 10 metres in width) or other “incidental” or left over pieces of land shall not be considered as part of the useable open space provision in a residential development; • Natural features such as trees, hedgerows and wetland sites, should be retained, protected and incorporated into public open space areas; • Public open space shall be provided in a form and layout which facilitates maintenance; 	<p>The applicant has stated that 16% of the total site area is given over to public open space and this is deemed acceptable.</p>	<p>The proposed public open space is 15% of the total site area, as required by policy.</p>		<p>See Plan Schedule, ref nos D7, R2, R4, R4a, R8, D55, D56</p>
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<ul style="list-style-type: none"> • SuDs are not generally acceptable as a form of public open space provision except where they contribute in a significant and positive way to the design and quality of open space. Where the Council considers that this is the case, in general, a maximum of 10% of the total open space provision shall be taken up by SuDs; • For housing developments greater than 20 houses, a hierarchy of public open space incorporating different recreational and amenity uses such as sitting out areas, areas for small children to play and areas suitable for ball games, shall be provided; • Appropriate pedestrian and cycle linkages between open spaces should be provided; and • Provide green corridors in all new developments where the opportunity exists. 				
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<p>DMS-22 Green Infrastructure Masterplan: A Green Infrastructure Masterplan shall be prepared for applications of 20 houses or more, which addresses the following;</p> <ul style="list-style-type: none"> • Retention and enhancement where possible of existing wetland habitat, hedgerow, woodlands, meadows and habitats of species protected under European legislation and National Wildlife Acts; • The creation of new green infrastructure assets such as public open space, green roofs, green walls, tree planting and natural pollination zones; • Increased and improved ecological corridor connectivity and pedestrian and cycle path linkages with existing green infrastructure assets in the area. Where a large site adjoins a green corridor, a public open space or an area of high ecological value, any new public open space on the site should be contiguous to same to encourage visual continuity and expansion of biodiversity which can assist in expanding the green infrastructure network; and • A consideration of existing flood risk areas, wetlands and proposed SuDs systems. <p>Phasing proposals shall ensure that open space to serve units in a given phase is completed to the satisfaction of the Planning Authority, prior to the initiation of the succeeding phase.</p>	<p>A green infrastructure masterplan has not been provided and is required</p>	<p>A detailed Green Infrastructure Masterplan is provided, together with Landscaping Strategy and proposals</p>		<p>See Plan Schedule, ref nos R2, R8, D3, D4, D55-D59</p>
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<p>DMS-23 Sustainable Urban Drainage Systems (SuDS): Applications for new developments shall include details of how SuDS have been satisfactorily incorporated into the design of the scheme. In addition, applications must demonstrate clearly how the incorporation of SUDS can benefit the overall scheme or contribute to the area by an end use that:</p> <ul style="list-style-type: none"> • Is functional to the scheme, • has an amenity value; or, • has a habitat creation value. 	<p>This requires to be address in the submitted application</p>	<p>SuDS proposed and information provided in Report on Surface Water Drainage</p>		<p>See Plan Schedule, ref nos D42-D48, R15-R17</p>
<p>DMS-24 Surface Water Management: Surface water shall not be permitted to flow on to the public road. Accesses and road frontage should be designed in such a manner as to deal with surface water and ensure that it does not impact on the public road. Existing roadside drainage shall be maintained by the incorporation of a suitably sized drainage pipe. Each application shall be accompanied by design calculations or appropriate evidence to support the size of the pipe selected.</p> <p>Applications for substantial hard-surfaced areas must demonstrate methods of controlling and limiting surface water run-off such as;</p> <ul style="list-style-type: none"> • Use of permeable paving/surfaces; • Bio-retention areas; and <p>Swales (which should be maintainable), such that rainfall is not directed immediately to surface drains.</p>	<p>This requires to be address in the submitted application</p>	<p>Permeable Paving used within the curtilage of private houses. Tree pits and swales implemented to reduce surface water run-off. Refer to Surface Water Drainage report for further details</p>		<p>See Plan Schedule, ref nos D42-D48, R15-R17</p>



<p>DMS-31 Residential Energy Efficiency and Climate Change Adaptation Design Statement: Development proposals for medium to large scale residential in excess of 10 residential units should be accompanied by an Energy Efficiency and Climate Change Adaptation Design Statement. The statement should detail how any on-site demolition, construction and long-term management of the development will be catered for and how energy and climate change adaptation considerations have been inherently addressed in the design and planning of the scheme.</p> <p>Residential developments shall have regard to;</p> <ul style="list-style-type: none"> • the requirements of the current Building Regulations Part L – Conservation of Fuel and Energy (2008 and 2011), and any other supplementary or superseding guidance documents. • the DECLG guidance document ‘Towards nearly Zero Energy Buildings in Ireland - Planning for 2020 and Beyond’, which promotes the increase of near Zero Energy Buildings (nZEB); • Criteria 5 and 9 of the DEHLG Urban Design – A Best Practice Guide (2009) which relate to efficiency and adaptability, or any subsequent revisions to these Guidelines or Regulations thereafter. Developers shall ensure that measures to upgrade the energy efficiency of Protected Structures and historic buildings are sensitive to traditional construction methods and materials and do not have a detrimental physical, aesthetic or visual impact on the structure. They should follow the principles and direction given in the Department of Arts, Heritage and the Gaeltacht’s publication Energy Efficiency in Traditional Buildings. 	<p>A Residential Energy Efficiency and Climate Change Adaptation Design Statement has not been provided and is required.</p>	<p>A Residential Energy Efficiency and Climate Change Adaptation Design Statement forms part of the application documentation and demonstrates that the development complies with requirements regarding the climate crises, and that buildings are adaptable.</p>		<p>See Plan Schedule, ref R12</p>
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The author of an Energy Efficiency and Climate Change Adaptation Design Statement should be appropriately qualified or competent and shall provide details of their qualifications and experience along with the statement.






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<p>DMS-32 Childcare: All childcare facilities shall be provided in accordance with the Childcare Facilities: Guidelines for Planning Authorities (DEHLG). In particular, one childcare facility is generally required to cater for 20 places in developments of 75 houses, including local authority and social housing schemes, in accordance with DEHLG Guidelines. This standard may be varied depending on local circumstances</p> <p>The complete conversion of existing semi-detached and terraced dwellings within housing estates to childcare facilities is generally discouraged. The childcare use should remain secondary and the bulk of the house should be retained for residential purposes.</p> <p>In new housing estates, purpose built facilities are normally required; these are best located at or near the front of the estate. Safe access and sufficient convenient off-street car parking and/or suitable drop-off and collection points for customers and staff will be required.</p> <p>Developers shall generally be required to provide childcare facilities as part of Phase 1 of development.</p> <p>Planning applications for childcare facilities should include the following details:</p> <ul style="list-style-type: none"> • Nature of the facility, for example, full day care, sessional, drop in, after school care; • Number and age range of children being catered for and number of staff; • Parking provision for both customers and staff; • Proposed hours of operation; and 	<p>Details are required regarding the crèche:</p> <ul style="list-style-type: none"> • Nature of the facility, for example, full day care, sessional, drop in, after school care; • Number of Staff; • Parking provision for both customers and staff; • Proposed hours of operation; and • Open space provision in the form of play areas and measures for its management 	<p>The Creche will be provided to meet the needs of an interested occupier, and it is envisaged that this will be towards completion of the development, as demand for places is generated,</p> <p>It is likely that it will accommodate 30 children. No definitive plans are in place at this time regarding the nature of creche, but it is likely to be for full or sessional care, normal working hours (8am – 6pm). Parking is provided for staff and customers / dropoff and includes cycle parking. Open space is provided immediately the creche for its own use, and which will be managed by the creche owners / operators.</p>		<p>See Plan Schedule, ref D3, D8, D33, R2, R4</p>
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<ul style="list-style-type: none">• Open space provision in the form of play areas and measures for its management.				
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DMS-99 Cycle Parking Standards		Bicycle parking provision should meet the requirement of DMS -99 of the Offaly Development Plan 2021-2027 for the apartment development and for the proposed crèche and details should be provided which includes capacity of the cycle parking proposed for the apartments	Cycle parking provided to standard – within proposed houses and storage within apartment buildings.		See Plan Schedule, ref nos D3, D8, D9, R2, R4, R11
Type of Development	Cycle				
Apartment	1 space 2 spaces				
DMS-102 Car Parking Requirements		Vehicular parking provision of may be insufficient, notwithstanding the requirement of the CDP 2021-2027, DMS 102 which sets a maximum but no minimum standard. Given that that car ownership in Offaly is above the national average the provision of only one space per two bed house (see page 25 of the submitted MCORM report) may lead to parking on footpaths-kerbs as currently happens in other housing estates. A separate site layout drawing designating which car parking spaces are ancillary to which proposed units should be submitted.	Car parking provided to standard – within curtilage of proposed houses and adjacent to apartment and creche buildings. Parking Strategy identified.		See Plan Schedule, ref nos D3, D8, D9, R2, R4, R11
Land Use	Maximum Capacity				
House (outside town centre)	2 spaces per unit				
House (town and village centre location)	1 space per unit Authority is satisfied				
Apartment	1 space per unit locations, town centre				
Crèche/Childcare	1 space per 4 units				
A minimum of 5% of car parking spaces					







<p>DMS-114 Construction and Demolition Waste Management Plan: A Construction and Demolition Waste Management Plan, prepared in accordance with the Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects (Department of the Environment, Heritage and Local Government, 2006), and any updated version of these guidelines, shall be required as part of any planning application in excess of the following thresholds;</p> <ul style="list-style-type: none"> • New residential development of 10 houses or more; • Developments including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,250 m²; • Demolition/renovation/refurbishment projects generating in excess of 100 m³ in volume, of Construction and Demolition waste; <p>Civil engineering projects producing in excess of 500 m³ of waste, excluding waste materials used for development works on the site.</p>	<p>This is required.</p>	<p>An outline Construction and Demolition Waste Management Plan forms part of the application documentation, to required standard</p>		<p>See Plan Schedule, ref nos R19</p>
<ul style="list-style-type: none"> • ADDITIONAL ITEMS TO BE ADDRESSED 				





A building life cycle report in accordance with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments is required.		A Building Life Cycle Report is attached		See Plan Schedule, ref nos R13
Noted that site boundary needs to include the wayleave area between the pumping station and the proposed housing development as a new pipe is proposed going to the pumping station as shown in submitted drawing 2209-C-DR-202.		Red line includes all land subject to the development proposal, including the wayleave and boundaries.		See Plan Schedule, ref nos D2
Indicative photographic samples of dwelling and street finishes are required.		Included as part of application documentation		See Plan Schedule, ref nos R2
An Urban design statement and masterplan for opportunity site no 9 having regard to development principles in section 7.2.4 of the development plan is required		Design & Access Statement and planning Statement address the development principles and demonstrate that the requirements are met		See Plan Schedule, ref nos R2
The indicative masterplan should note that Community services /facilities zoning precludes retailing, see table 12.1 of the OCC Development Plan.		Masterplan for the wider Opportunity Site included within the application documentation. No retail uses are proposed, complying with the policy.		See Plan Schedule, ref nos D4, R2, R4



<p>Please indicate, in prominent font on the front cover of drawings/documents where a particular drawing/document addresses a particular OCC DMS standard.</p>		<p>The Plan Schedule references each document, plan, drawing etc submitted in support of the application and which is cross referred in the column to the far right, which links to the DMS. The Plan Schedule should be cross referenced in relation to assessment of each consideration relating to the proposal</p>		<p>All drawings, and cross refer to this statement; information provided in response to each and every LRD item.</p>
<p>It is noted that part of the site lies within an area effected by high road noise (N52) and the applicant is requested to submit measures to cater for the amenity of future residents of housing in the interior of the proposed dwellings.</p>		<p>Noise Report submitted as part of the planning application and demonstrates that no noise issue will arise for future residential occupiers.</p>		<p>See Plan Schedule, ref nos R9</p>
<p>The applicant is requested to engage with Irish Water by submitting a completed Pre-Connection Enquiry form which can be located on the Irish Water website Pre- Connection Enquiry Phase (www.water.ie). This will start off the Pre-Connection Enquiry phase which comprises; 1) Pre-Connection Enquiry, 2) Confirmation of feasibility for a public water supply.</p>		<p>Pre-Connection Enquiry form and agreement received. Information attached with application documentation</p>		<p>See Plan Schedule, ref nos R15-R17</p>
<p>Upon completion of the above process, the applicant is requested to submit the fully completed detailed water main supply design drawings and documents to Offaly County Council, as part of the planning application, together with the Irish Water Confirmation of Feasibility letter from Irish Water</p>		<p>Fully detailed design drawings attached with application documentation</p>		<p>See Plan Schedule, ref nos D42-D48, R15-R17</p>

<p>The applicant shall liaise directly with Irish Water regarding requirements and to provide both a feasibility certificate and Design Acceptance certificate as part of their planning submission</p>		<p>Confirmation of Feasibility and Statement of design acceptance received from Irish Water</p>		<p>See Plan Schedule, ref nos D42-D48, R15-R17</p>
<p>A Site-specific Flood Risk Assessment is required as part of the submission</p>		<p>SSFRA attached with submission which concludes proposed development is not at risk of flooding, will not increase flood risk elsewhere and is appropriate from a flood risk perspective.</p>		<p>See Plan Schedule, ref nos R16</p>
<p>The applicant shall investigate the potential of connecting to existing surface water public sewer or extending surface water sewer appropriately. If this cannot be achieved the applicant shall submit a written agreement, from any affected landowners the existing culvert is traversing, granting consent to discharge into the culvert.</p>		<p>The surface water drainage network for the proposed development connects to an existing surface water sewer. Further to discussions between Kilgallen and Partners and Martin Quinn of Offaly County Council in which the proposals for surface water drainage were discussed, Mr. Quinn accepted that landowners would not be affected and so written agreement would not be required.</p>		<p>See Plan Schedule, ref nos D42-D48, R15-R17</p>
<p>The applicant is requested to submit longitudinal sections of all main surface water sewers with cover and invert levels shown to OSI datum as well as pipe diameters and materials. The longitudinal sections should be drawn to a horizontal scale of 1 to 500 and a vertical scale of 1 to 100.</p>		<p>Longitudinal Sections, showing pipe diameters, invert levels and cover levels provided for all surface water sewers – horizontal scale at 1:1000 and vertical scale at 1:100.</p> <p>Pipe materials defined on drainage layout drawings.</p>		<p>See Plan Schedule, ref nos D42-D48, R15-R17</p>

<p>The applicant should submit design calculations of the required storage for a 1, 30 and 100-year storm event using the permissible discharge rates for each event. The graphs showing inflow vs outflow, storage volume and storage depth should be provided for the critical storm as well as all other relevant criteria such as rainfall ratio, M5-60 rainfall value, etc.</p>		<p>Design calculations and rainfall data submitted.</p>		<p>See Plan Schedule, ref nos D42-D48, R15-R17</p>
<p>The applicant is requested to provide details of the any proposed storm drainage discharge points including outfall pipe diameter, material, line, invert level, headwall details, manhole size and type etc.</p>		<p>Details submitted; demonstrate acceptable development</p>		<p>See Plan Schedule, ref nos D42-D48, R15-R17</p>
<p>The applicant is requested to engage with Irish Water by submitting a completed Pre-Connection Enquiry form which can be located on the Irish Water website Pre- Connection Enquiry Phase (www.water.ie). This will start off the Pre-Connection Enquiry phase which comprises; 1) Pre-Connection Enquiry, 2) Confirmation of feasibility, for a foul sewerage connection</p>		<p>Duplication requirement as referred to above. Information provided</p>		
<p>Upon completion of the above process, the applicant is requested to submit the fully completed detailed design drawings and documents to Offaly County Council, as part of the planning application, together with the Irish Water Confirmation of Feasibility letter from Irish Water.</p>		<p>Duplication requirement as referred to above. Information provided</p>		
<p>The applicant shall liase directly with Irish Water regarding requirements and to provide both a feasibility certificate and Design Acceptance certificate as part of their planning submission</p>		<p>Duplication requirement as referred to above. Information provided</p>		

The applicant is required to submit additional information on the proposed pumping station including detailed drawings & design calculations		Detailed drawings and design calculations submitted as informed by discussions between Kilgallen and Partners and Martin Quinn OCC.		See Plan Schedule, ref nos D42-D48, R15-R17
The applicant is requested to provide Foul sewer longitudinal sections with cover and invert levels shown to OSI datum as well as pipe diameters and materials. The longitudinal sections should be drawn to a horizontal scale of 1 to 500 and a vertical scale of 1 to 100.		Longitudinal Sections, showing pipe diameters, invert levels and cover levels provided for all wastewater sewers – horizontal scale at 1:1000 and vertical scale at 1:100. Pipe materials defined on wastewater layout drawings.		See Plan Schedule, ref nos D42-D48, R15-R17
A Noise Assessment Report is required as part of the submission		NIA submitted; demonstrates noise impact will not be significant.		See Plan Schedule, ref nos R9
A Biodiversity Management Plan is required as part of the submission		Biodiversity is addressed within the Ecology Report and Landscape Statement which demonstrates the biodiversity enhancement.		See Plan Schedule, ref nos R8
The applicant is requested to submit a Stage 1 & 2 Road Safety Audit for the proposed development in accordance with Tii documentation GE-STY-01024, December 2017 to identify any road safety concerns. Recommendations from the Road Safety Audit shall be incorporated in any revised proposals.		Stage1/2 RSA completed and finds the proposal acceptable; recommendations taken onboard where relevant.		See Plan Schedule, ref nos D3, R11,
The applicant is requested to submit a DMURs Quality Audit for the proposed development.		Included within Transport Report, find proposal acceptable		See Plan Schedule, ref nos D3, R11,

<p>The footpaths at the main entrance to the proposed development shall be continued across junctions in order to maintain pedestrian priority. The applicant shall submit a detailed design drawings and cross section of the proposed pedestrian junction including the location of tactile paving at crossings and tactile hazard warning paving for the written agreement of the planning authority.</p>		<p>Details have been included within proposals.</p>		<p>See Plan Schedule, ref nos D3,D39-41 R11,</p>
<p>The pedestrian crossings at junction within the site shall be designed to promote pedestrian priority. (Ref to DMURS section 4.3.2 and figure 4.38)</p>		<p>Details have been included within proposals.</p>		<p>See Plan Schedule, ref nos D3,D39-41 R11,</p>
<p>The applicant shall submit details in relation to the proposed pedestrian crossings within the site. The pedestrian crossing tables tops are to be constructed are in accordance with section 6.13.3 & Diagram 6.34 of the Traffic Management Guidelines (Page 104 & 105).</p>		<p>Details have been included within proposals.</p>		<p>See Plan Schedule, ref nos D3,D39-41 R11,</p>
<p>The Applicant shall submit a proposal to have a dedicated set down area for parent drop off/pickup, turning area and parking assigned to the childcare facilities, which will not conflict with residential parking. The applicant shall indicate the number and location of parking spaces to be provided for the Childcare facilities staff members and parent parking.</p>		<p>Set down areas and parking areas shown on submitted plans for staff, and parents and for cycle. Note the site is conveniently accessible to a considerable walk-in catchment population.</p>		<p>See Plan Schedule, ref nos D3,D39-41 R11,</p>

<p>The applicant to ensure that parking requirements meet the requirement as set out in the Offaly County Development Plan 2021-2027 (Section 13.9.11 - DMS-99, DMS-102 & DMS- 104) Car Parking Requirements. The Applicant shall submit a drawing indicating the locations of the parking allocation for each of the housing units, apartments and proposed childcare facility. Parking not within the curtilage of dwelling shall be allocated. i.e. apartments to be allocated appropriate number of car parking spaces. These spaces shall be allocated and line marked.</p>		<p>Parking shown to required standards. Plans submitted showing parking strategy.</p>		<p>See Plan Schedule, ref nos D3,D39-41 R11,</p>
<p>CONCLUSION</p> <p>It is considered that the documentation submitted for the purposes of the LRD meeting <u>does not constitute a reasonable basis</u> on which to make an application for permission for the proposed LRD.</p> <p>In the event that the applicant submits an LRD planning application relating to the development subject of this written opinion please include a statement of response to the issues raised in this LRD Written opinion.</p>		<p>This summary list addresses the points raised in the OCC LRD Opinion response and demonstrates that the application documentation pack addresses all matters. It shows that all policy requirements are met and indicates the plans, drawings, reports and assessments which provide specific detail.</p>		<p>See all application documentation, as referenced above</p>

3.0 Conclusion

- 3.1 This Compliance Statement accompanies the LRD application for residential development at Wellwood, and demonstrates the manner within which the proposal has evolved to address the matters raised by OCC in its formal Opinion expressed following the LRD meeting.
- 3.2 It is considered that there has been proper response to all matters raised and that the development, as proposed, will meet the requirements of the Offaly County Development Plan and all related and applicable policy and guidance, and is in compliance with the matters expressed in OCC's LRD Opinion. A small deviation relates to landscaping and boundary treatment adjacent to existing residential properties only, and this revision has taken place specifically to meet the requirements of residents amenity, following consultation, and is considered to be in the interests of best practice.

- 3.3 Accordingly, it is considered that the proposal is in accordance with the proper planning and sustainable development of the area and that planning permission should be granted for the LRD development to allow for the implementation of the permission and the delivery of much needed housing in Tullamore, to the benefit of its community.

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