



An
Bord
Pleanála

**S. 6(7) of Planning and
Development (Housing)
and Residential
Tenancies Act 2016**

**Inspector's Report on
Recommended Opinion**

ABP-306266-19

Strategic Housing Development	199 no. houses and 128 no. apartments with a crèche and all associated site works.
Location	Charterschool Land, Manorlands 2nd Division & Commons Td 7th Division, Trim, Co. Meath.
Planning Authority	Meath County Council
Prospective Applicant	Keegan Land Holdings
Date of Consultation Meeting	13 th February 2020
Date of Site Inspection	5 th February 2020
Inspector	Erika Casey

1.0 Introduction

- 1.1 Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the Planning Authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

2.0 Site Location and Description

- 2.1 The subject site with a stated area of 8.8ha is located c. 300 metres to the south of Trim town centre. It comprises undeveloped brownfield and greenfield lands bound by the Care Choice Care Centre and Applegreen Service Station to the south, to the west, by agricultural lands, to the east by the Summerhill Road (R158) and to the north, by Mornington House (protected structure RPS:TT036-084) and the Manorlands housing estate, a traditional suburban housing development. It is understood the site was formerly in use as a livestock mart. The remains of a former agricultural structure is located along the east boundary.
- 2.2 Existing vehicular access to the site is from the Summerhill Road. The site comprises of scrub vegetation with some areas of hardstanding and evidence of dumping and construction waste. Parts of the northern, southern and eastern boundaries comprise mature trees and hedgerows. The north western boundary comprises the rear boundary walls of the Manorlands housing development. A row of mature trees and hedgerows cuts through the centre of the site. The site is located in close proximity to public transport bus stops.
- 2.3 There is a recorded monument/enclosure (ME036-026) located along the northern site boundary. A number of mature trees within Mornington House are protected. There is a protected view along the eastern site frontage – view of the Wellington Monument from Patrick St., Emmet St. and the Summerhill Road.

3.0 Proposed Strategic Housing Development

3.1 The proposed development comprises:

- Construction of 327 no. dwellings comprising 199 no. houses and 128 apartments.
- Crèche with a floor area of 496 sq. metres.
- 531 no. car parking spaces and 220 no. bicycle parking spaces.
- Vehicular access off Summerhill Road.
- Site services and ancillary works including bin stores, ESB substations, services connections, communal open space, boundary treatment, site re-profiling and landscaping.

3.2 The housing mix is as follows:

Unit Type	No.	Percentage
Studio	16	5
1 bed dwelling	48	15
2 bed dwelling	128	39
3 bed dwelling	116	35
4 bed dwelling	19	6
Total	327	

Key Parameters

Parameter	Site Proposal
Gross Site Area	8.8ha
Open Space	10,170 sq. metres – Public Open Space 3,558 sq. metres - Communal Open Space 16% of site area

Houses	199
Apartments	128
Density	40.1 units per ha
Plot Ratio	0.39
Site Coverage	19%
Crèche	493 – 97 childcare places
Parking	531 spaces
Dual aspect	38%

4.0 Planning History

4.1 There have been a number of previous applications on the subject lands. The most relevant of which are detailed below.

Application Reference TA/110312/Appeal Reference PL17.240389

4.2 Permission refused by the Board in November 2012 for a development comprising 106 residential units, crèche, children’s play centre, arts and craft centre, community shop and gym. There was one reason for refusal:

“Having regard to the layout of the proposed development including the prevalence of car dominant roads and the excessive vehicular connections to land proposed for development to the east of the site, to the unsuccessful proposed public open spaces within the site which would militate against the creation of a sense of community and place, to the failure to create safe, secure and enclosed character areas, to the excessive mix of architectural styles in the proposal, to the failure to incorporate the lands to the south of the proposed access road into the proposal, and to the fact that the main proposed open spaces of the proposal are surrounded on all sides by road access ways, the Board considered that the proposed development would give rise to a low standard of residential environment, which would be in conflict with the policy of the planning authority to ensure the provision of high quality new residential environments with good layout and would fail to incorporate the principles of the Urban Design Manual (May 2009) issued by the Department of the Environment, Heritage and Local Government as an accompanying volume to Guidelines for Planning Authorities on Sustainable Residential Development in Urban

Areas. The proposed development would, therefore, seriously injure the amenities of future residents and be contrary to the proper planning and sustainable development of the area.”

Application Reference TA/900170/Appeal Reference PL17.235264

- 4.3 Permission refused in August 2010 for a development comprising the decommissioning of underground storage tanks, construction of 150 dwellings, crèche and 4 commercial units. The reason for refusal was as follows:

“The site is located in a prominent area in the historic town of Trim, which is a heritage town, and close to a zone of Archaeological potential and an Architectural Conservation Area. It is an objective of the Trim Development Plan 2008-2014, which relates to this site under FP4 (inter alia) to provide for high quality design and layout, and development of a scale appropriate at this location and fully integrated with the existing urban fabric. It is considered that the proposed development, by reason of its poor quality urban design, layout and architecture, would not integrate with the character of the town, would fail to comply with the policies of the development plan and would, therefore, be contrary to the proper planning and sustainable development of the area.”

- 4.4 There were also a number of earlier applications pertaining to the site including TA/70042, TA/706094 and TA/801950 also relating to residential development. All were refused permission for reasons relating to failure to implement SuDS, poor site layout, deficiencies in water supply and inappropriate scale and form.

5.0 National and Local Planning Policy

5.1 National Policy

- 5.1.1 The **National Planning Framework - Project Ireland 2040**, published in 2018 is the Governments plan for shaping the future growth and development of Ireland to 2040. Under National Strategic Outcome 1 (Compact Growth), the focus is on pursuing a compact growth policy at national, regional and local level. From an urban perspective, the aim is to deliver a greater proportion of residential development within existing built-up areas of cities, towns and villages, to facilitate infill development and enable greater densities to be achieved, whilst achieving high quality and design standards.

- 5.1.2 The NPF includes a specific Chapter, No. 6, entitled ‘People Homes and Communities’, which includes 12 objectives amongst which, Objective 27 seeks to *‘ensure the integration of safe and convenient alternatives to the car into the design*

of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages'. Objective 33 seeks to 'prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location'. Objective 35 seeks to 'increase residential densities in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights'.

Section 28 Ministerial Guidelines

5.1.3 Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submission from the Planning Authority, I am of the opinion that the directly relevant S.28 Ministerial Guidelines are:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual').
- Sustainable Urban Housing: Design Standards for New Apartments (2018).
- Design Manual for Urban Roads and Streets.
- The Planning System and Flood Risk Management (including associated Technical Appendices).
- Childcare Facilities – Guidelines for Planning Authorities.
- Urban Development and Building Height Guidelines 2018.
- Quality Housing for Sustainable Communities: Best Practice Guidelines for Sustainable Communities.

5.2 Regional Policy

5.2.1 The **Eastern and Midland Regional and Spatial Economic Strategy**, which came into effect on June 28th, 2019, builds on the foundations of Government policy in Project Ireland 2040, which combines spatial planning with capital investment.

Chapter 4 (People & Place) sets out a settlement hierarchy for the Region and identifies the key locations for population and employment growth. It includes *Dublin City and suburbs, Regional Growth Centres* (Drogheda, Athlone and Dundalk) at the top of the settlement hierarchy and identifies *Key Town's* in each area with the highest potential to accommodate growth. Other centres lower in the settlement hierarchy including *Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns &*

Villages, and *Rural Areas* are not specifically identified, and remain to be defined by the development plan.

5.2.2 Under the RSES, Trim would be considered a Self-Sustaining Growth Town which is defined as a settlement with a strong service and employment function and may have the capacity to support a level of commensurate population and employment growth to become more self-sustaining, in line with their capacity of public transport, services and infrastructure, to be determined by local authorities.

5.3 Local Policy

Meath County Development Plan 2013-2019

5.3.1 Under the current County Plan, Trim is identified as a Moderate Sustainable Growth Town in the settlement hierarchy. Objective SSOBJ11 states:

“To ensure that Moderate Sustainable Growth Towns develop in a self-sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.”

5.3.2 The following housing policies are set out:

HS Pol 1: *“To encourage and foster the creation of attractive mixed use sustainable communities which contact a variety of housing types and tenures with supporting community facilities, public realm and residential amenities.”*

HS Pol 2: *“To require a high standard of design in all new residential schemes that are built in a style and scale that is appropriate to the landscape setting.”*

HS Pol 3: *“To integrate new housing into the existing social and urban fabric of the County’s settlements.”*

Draft Meath County Development Plan 2020-2026

5.3.3 The draft Meath County Development Plan 2020-2026 is currently on display and Trim is identified as a Self Sustaining Growth Town. These are described as:

“Towns with a moderate level of jobs and services – includes sub county market and commuter towns with good transport links and capacity for continued commensurate growth to become more self sustaining.”

5.3.4 It is an objective of the plan under CS OBJ 9 to prepare a new local area plan for

Trim.

- 5.3.5 Under the draft plan, the zoning of the site is A2 New Residential: *“To provide for new residential communities with ancillary community facilities, neighbourhood facilities and employment uses as considered appropriate for the status of the centre in the settlement hierarchy”* and G1: Community Infrastructure: *“To provide for necessary community, social, and educational facilities”*.
- 5.3.6 Under the draft core strategy, the population of Trim is expected to grow to 11,444 persons by 2026, an increase of 2,250 persons. The household allocation for the settlement is 1,333 units (including 437 extant units not yet constructed) with the potential for 812 units to be delivered on infill brownfield lands.
- 5.3.7 The plan includes a number of policies and objectives regarding residential development including CSOBJ 4: *“To achieve more compact growth by promoting the development of infill and brownfield/regeneration sites and the redevelopment of underutilised land within and close to the existing built up footprint of existing settlements in preference to edge of centre locations.”*
- 5.3.8 The draft plan notes that the town centre and edge of centre affords opportunities for higher density urban living with design and layout appropriate to the town’s heritage status.
- 5.3.9 The draft plan identifies the subject lands as Master Plan lands and state they are a key mechanism for the delivery of critical infrastructure linking the Navan and Dublin Roads. It is further stated *“the purpose of a Master Plan is to ensure an integrated approach is taken to the phasing, management, and development of lands within the Master Plan Area. A planning application will not be considered in the absence of the Master Plan being agreed in writing with the Executive of the Planning Authority unless it can be demonstrated that the application will not undermine the objectives of the Master Plan being achieved.”*

5.3.10 It is further stated:

“To provide for the development of a mixed use residential and community development as part of overall proposals for the former Potterton cattle sales yard to the north of the Summerhill/ Longwood Road roundabout off the Trim Inner Relief Road. Development shall be on a phased basis within the life of the Trim Development Plan as identified on the land use zoning objectives map. The Master

Plan shall be agreed in writing with the Executive of the Planning Authority prior to the lodgement of any planning application.”

5.3.11 The draft plan includes the following objective under OBJ 14: RT 5: *“Construction of local distributor road link between the Longwood Road and the Summerhill Road. This shall be provided in tandem with the industrial lands immediately to the north.”*

Trim Development Plan 2014-2020

5.3.12 The Trim Development Plan is the operative development plan for the area. Variation No. 1 of the plan made amendments to the plan to incorporate the key tenets of the Economic Development Strategy for County Meath 2014-2022.

5.3.13 The plan includes a number of strategic aims including to facilitate the growth of Trim as a Moderate Sustainable Growth Town. The plan also includes a number of core strategy policies including Core Strategy POL 3: *“to consolidate and develop a sustainable town and avoid further sprawl.”*

5.3.14 Under the development plan, the site is primarily zoned A2 New Residential: *“to provide for new residential communities with ancillary facilities, neighbourhood facilities and employment uses as considered appropriate for the status of the centre in the Settlement Hierarchy”.*

5.3.15 A small portion of the site to the south east is zoned G1 Community Infrastructure: *“To provide for necessary community, social and educational facilities.”*

5.3.16 The subject lands and adjoining lands to the east are subject to Objective MP2. Core Strategy Objective 2 states:

“To provide for the development of a mixed use residential and community development as part of the overall proposals for the former Potterton cattle sales yard to the north of the Summerhill/Longwood Road roundabout off the Trim Inner Relief Road. Development shall be on a phased basis within the life of the Trim Development Plan as identified on the land use zoning objectives map. A Master Plan shall accompany any planning application for the development of these lands. The Masterplan which shall be agreed in writing with the Executive of the Planning Authority prior to the submission of a Planning Application on these lands. The Masterplan shall address land use, transportation, connectivity, urban design, environmental impacts including flood risk, phasing and implementation to the satisfaction of the Executive of the Planning Authority.

The Masterplan shall contain, inter alia the following information:

- *A design concept for the lands;*
- *Guidance for high quality design through the development;*
- *Building heights and densities;*
- *A landscape plan for the development and landscape management plan (post completion of the development);*
- *Specific landscape buffering and visual screening on all boundaries in the interest of visual amenity;*
- *Flood Risk Assessment which takes account of the policies and guidance within Section 3 of the SFRA;*
- *A Transport Assessment which addresses the following issues:*
 - 1) *Access arrangements to the development site;*
 - 2) *Provision of safe cycleways and pedestrian routes throughout the lands and*
 - 3) *Provision and access for service vehicles to the lands.”*

5.3.17 The plan sets out a number of policies and objectives regarding housing and includes the key housing aim to *“promote the development of mixed use sustainable communities with supporting community facilities, public realm and residential amenities which cater for a range of housing needs and tenures.”*

5.3.18 The Plan includes transportation objective TRANS OBJ 12-RT5 and an indicative road link to the west of the overall landholding. It states:

“Pending a review into the need for the distributor road network, the commencement of which would begin within one year of the adoption of the Plan, to preserve (and where indicated to construct subject to routing, environmental assessment and appropriate assessment) and secure from further development a corridor for the provision of distributor link roads which include the following routes:

RT5: Construction of the local distributor road link between Kinnegad Road and Longwood Road.”

6.0 Forming of the Opinion

6.1 Introduction

6.1.1 Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant, the Planning Authority submission and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

6.2 Documentation Submitted

6.2.1 The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia, Completed Application Form, Cover Letter, Part V Documentation, Irish Water Pre-Connection Enquiry; Statement of Consistency, Planning Report, EIS Screening Report, Response to Issues Raised at S47 Meeting, Landscape Rationale, Landscape Masterplan, Engineering Drawings, Civil Planning Report, Traffic and Transport Assessment, Feasibility Report, Arboricultural Report and Drawings, Appropriate Assessment Screening Report, Ecological Impact Assessment, Bat Survey Report, Visual Assessment Report, Archaeology and Built Heritage Report.

6.2.2 Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the Development Plan or Local Area Plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required. The applicant's case is summarised as follows:

- The development is consistent with the objectives of the NPF which encourages development within existing settlements in sustainable and viable locations. The site is well located in close proximity to the town centre. It will provide for a high quality residential scheme.
- Under the RSES, Trim falls within the Sustaining Growth Towns category which

are towns that should be targeted for consolidation coupled with targeted investment to improve local employment services and sustainable transport options to become more self-sustaining settlements. The development will provide residential development on a key site within the established built up area of Trim at a density that is sustainable and appropriate.

- In accordance with SPPR3 and 4 of the Urban Development and Building Heights: Guidelines for Planning Authorities 2017, it is considered that the subject site is an appropriate site for buildings ranging in height up to 4 storeys as proposed. The development responds to its environment and makes a positive contribution to the streetscape, creating an appropriate urban edge to the Summerhill Road.
- The layout of the development has been designed to reflect its important location along the Summerhill Road on the main entry to the town from the south. It will provide an appropriate urban edge and visual marker. High quality materials and finishes are proposed.
- Given the characteristics of the site which is a mix of brownfield and greenfield and located outside the town centre, the proposed density of 40 units per ha is considered suitable and consistent with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009. The development achieves a suitable mix of residential types and sizes. It is a sequentially appropriate site for development.
- The application site will be served by several high quality walking and cycling links connecting to the town centre and nearby schools and public transport. There will be a number of pedestrian/cyclist access points into the site off Summerhill Road to the east. The scheme will also facilitate possible future pedestrian and vehicular links to the north and west of the development.
- The scheme is designed around a series of public open spaces and strands of mature trees and hedgerows. These areas will be further enhanced through the proposed landscaping of the scheme. All dwellings have ease of access to these areas and are overlooked by the dwellings creating a safe and secure area.
- The development complies with the 12 criteria set out in the Urban Design

Manual – A Best Practice Guide 2009.

- All units accord with the quantitative and qualitative standards set down in the apartment guidelines. 38% of apartments are dual aspect in accordance with SPPR4. The subject site is considered to be located within an Intermediate Urban Location due to its proximity to Trim Town Centre.
- In accordance with the Quality Housing for Sustainable Communities: Best Practice Guidelines for Sustainable Communities 2007, the scheme will provide an appropriate mix of 1, 2, 3 and 4 bed dwellings. The design and layout creates a liveable and visually pleasing residential environment.
- The scheme is compliant with DMURS. The scheme prioritises pedestrians and cyclists throughout the development.
- The development provides a crèche facility in accordance with the Guidelines for Planning Authorities on Childcare Facilities.
- In accordance with the objectives of the current Meath County Development Plan, it is considered that the development will enable Trim to continue to develop in a self-sufficient manner to facilitate additional population growth in line with its Settlement Strategy status. The development is consistent with the plan's housing, transport, childcare, community infrastructure policies. The development is fully in accordance with the development management standards set out in the County Plan.
- The development is fully in compliance with the zoning objectives set out in the Trim Development Plan 2014-2020. With regard to the masterplan objective pertaining to the site, the applicant will commit to preparing a masterplan for agreement as part of the Stage 3 planning application. The development is compliant with the policies and objectives of the plan.

6.3 Planning Authority Submission

- Note that under the current TDP, it is necessary for a masterplan to be submitted as part of the application. The Masterplan submitted has not sufficiently evaluated the future development of the overall lands. Under the draft County Plan, it is not proposed to retain the objective for a masterplan on the lands. The zoning proposed under the draft plan is consistent with the

current zoning objective.

- State that the core strategy allocation for Trim under the draft plan is 518 units. The total extant units (excluding completed) is 437 units. There is c.15.18 ha of Phase 1 lands that have no extant permission. At a density of 35 units per ha, that would yield 531 units.
- Consider that the density proposed is consistent with the County Development Plan and the character of the area. The development provides a good mix in terms of dwelling types/design throughout the development.
- 15% open space should be provided on the residential zoned lands. The dwellings comply with the provisions of the plan regarding private open space. Communal open space of the apartment blocks should be sufficient and usable.
- Boundary treatment considered acceptable.
- The proposed trip rates appear to be of a low order for both houses and apartments. Full TRICS input and output results should be provided as part of the TTA submission. Road Safety Audit should be carried out.
- Some works required to construct the access are outside the red line boundary.
- Street hierarchy in compliance with DMURS should be provided. Concern regarding one way roads. Full swept path analysis required. Cycle paths do not comply with the NCM. Cycle paths should be connected. Car parking serving apartments not compliant with DMURS.
- Further detail required for bicycle parking clarifying quantum and storage to be provided and that the locations are accessible, sheltered and secure.
- The development does not meet the requirements of the Water Services Section with respect to the orderly collection, treatment and disposal of surface water. Number of detailed technical issues raised.
- A WMP, CWMP and CEMP are required.
- The applicant has not provided a report identifying the demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.
- Public art should be incorporated into the scheme. An appropriate level of

infrastructure for broadband should be provided for within the development.

- Potential impact of the development on View no. 11 protected under the development plan has not been fully illustrated. Conservation Officer considers that the height of Block 2 should be reduced by one storey in order to integrate the scheme better in scale and in relation to the setting of the adjoining protected structure – Mornington House.
- Recorded monument ME 036-036 and ME01635 needs to be retained and a zone of exclusion created as a green space around the monument as part of any development.
- Notes anomalies in the Part V documentation.

Planning Opinion

6.4 Prescribed Bodies

Irish Water (03.02.2020)

- **Water:** Based on network configuration and the size of development upgrades are required as follows; 40 metres of 100mm ID watermains are required to be upsized to 200mm ID and the connection to be made after DMA meter to the south of the site.
- **Wastewater:** The confirmation of feasibility states that the applicant must enter into a Project Works Services Agreement with Irish Water to carry out studies and investigations of the existing 225mm sewer to obtain level data to allow an assessment of available capacity if draining to the south. The pump station capacity needs clarification through hydraulic capacity assessment as part of this survey package of works. Until such time as the hydraulic modelling has been completed, details on upgrades and infrastructure needs cannot be confirmed.

6.5 Consultation Meeting

6.5.1 A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 13th of February 2019, commencing at 11.30 PM. Representatives of the prospective applicant, the Planning Authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

6.5.2 The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:

1. **Principle of development** and compliance with provisions of the Trim Development Plan 2014 to 2020 and the draft County Development Plan 2020-2026.
2. **Development strategy** with particular regard to design and treatment of apartments blocks and their interface with the Summerhill Road; quality of public realm; road hierarchy and compliance with DMURS; connections and permeability; phasing of development; SuDs.
3. **Drainage** with particular regard to the comments from IW and Meath County Council Water Services Department.
4. **Traffic and access**
5. **Any other matters**

6.5.3 In relation to **principle of development** An Bord Pleanála sought further elaboration/discussion/consideration of the following

- Compliance with provisions of the Trim Development Plan 2014 to 2020 and in particular the requirement to prepare a masterplan for the subject lands.
- The provisions of the draft County Development Plan 2020-2026 with regard to the draft core strategy and future housing allocation for Trim and TRM Obj 3 regarding the development of a masterplan for the subject lands.
- Compliance with the GI Community Infrastructure zoning objective pertaining to the site.

6.5.4 In relation to the **Development Strategy** with particular regard to design and treatment of apartment blocks and their interface with the Summerhill Road; quality of public realm; road hierarchy and compliance with DMURS; connections and permeability; phasing of development and SuDS, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The need to create a high quality living environment with a focus on quality of place making and defined character areas. The need for a high quality design in the context of the status of Trim a heritage town was emphasised.
- The design and interface of the apartment blocks fronting the Summerhill Road. The need to provide an appropriate urban edge and public realm having regard to the deficient pedestrian facilities along the R158. Consideration of removal of hedgerow along the R158 to create a more appropriate public realm.
- The need for a high quality design having regard to the visibility of the site with high quality materials and appropriate elevational treatment that is not monotonous or repetitious. The need to provide a more appropriate urban edge at the roundabout.
- The disposition of open space provided and the need to develop an appropriate hierarchy of open spaces and ensure open space is usable and functional; surveillance of open spaces and ensuring the open spaces are well connected and integrated within the overall site. The need for a greater sense of enclosure around the open spaces. The quality of the communal open space to the east of the apartment blocks and potential of overshadowing.
- The need to create appropriate connections and permeability throughout the site to adjoining lands including the possibility of additional connection points as well as the functionality of some connections, particularly at the roundabout.
- Road layout and design, the need for an appropriate hierarchy of streets, shared surfaces and compliance with the principles of DMURS.
- Car parking and cycle parking layout. The design of cycle paths throughout the scheme. The dominance of surface car parking. Parallel road should be omitted.
- Housing unit typology, elevational treatment, design, finishes and materials. The need for greater variety.
- The need to provide appropriate double fronted corner units and avoidance of blank walls along road frontages and adjacent to public open space to ensure appropriate passive surveillance.

- The need for a high quality landscape design. The requirement for high quality boundary treatment.
- Phasing of the development with MCC noting the crèche should be delivered in the first phase.
- SuDS strategy and the need to consider a variety of SuDS measures in the landscape strategy.
- Residential amenity and the extent of dual aspect units. It was detailed that a minimum of 50% of the units should be dual aspect.

6.5.5 In relation to **Drainage**, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The need to address the concerns of Meath County Council
- The requirements of Irish Water.

6.5.6 In relation to **Traffic and Access**, An Bord Pleanála sought further elaboration/discussion/consideration of the data underpinning the TIA. The need for Road Safety Audit and Mobility Management Plan. The technical concerns raised by Meath Co. Co.

6.5.7 In relation to any **Other Matters** An Bord Pleanála sought further elaboration/discussion/consideration of areas to be taken in charge, zoning to be clearly delineated on the application drawings and that a letter of consent to be obtained for any works outside the red line boundary.

6.5.8 Both the prospective applicant and the Planning Authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting '306266' which is on file. I have fully considered the responses and comments of the prospective applicant and Planning Authority in preparing the Recommended Opinion hereunder.

7.0 Conclusion and Recommendation

7.1 Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

7.2 I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the Planning Authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the s.28 Ministerial Guidelines, and local policy, via the statutory plan for the area.

7.3 Having regard to all of the above, I recommend that **further consideration and/or possible amendment** of the documents submitted are required at application stage in respect of the following elements:

- Development strategy.

7.4 Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act **requires further consideration and amendment in order to constitute a reasonable basis for an application** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

7.5 I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

8.0 Recommended Opinion

8.1 An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

8.2 Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the

opinion that the documentation submitted requires **further consideration and amendment** to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.

8.3 In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

1. Development Strategy

Further consideration of documents as they relate to the development strategy for the site, in particular the architectural approach and overall layout of the proposed development in relation to:

- The design and interface of the apartment blocks fronting the R158 Summerhill Road. Particular regard should be had to the requirement to create a high quality design response to the site with a strong urban edge, high quality materials and finishes and appropriate interface with the public realm to ensure satisfactory pedestrian and cyclist movements as well as potential permeability through the site.
- The configuration of the layout particularly as it relates to the creation of a hierarchy of high quality, functional and amenable public open spaces with maximum surveillance, appropriate enclosure, children's play, amenity and pedestrian connectivity should be given further consideration.
- The overall design approach to the site to ensure that a range of high quality housing typologies are provided and that a high quality living environment is created with distinct character areas and greater variety.
- The treatment of corners and street frontages to be considered further with the provision of double fronted units to ensure an appropriate public realm and strong urban edges/streetscapes are created, blank walls and side gables avoided and better passive surveillance provided for.
- Further consideration of the documents as they relate to the layout and design of streets within the development and the requirements of DMURS regarding permeability and connections with existing street network; hierarchy of routes and street function; enclosure including building frontage, furniture and planting

along streets; parking; widths of carriageways and footpaths; pedestrian crossing points; and types of junctions and corner radii. The submitted documents should demonstrate specific compliance with the particular stated provisions of DMURS. Generalised assertions regarding principles are not sufficient. For the cycle facilities that are proposed, the specific compliance with the particular requirements of the National Cycle Manual should be demonstrated by the documents.

- The design and layout of the internal road layout including measures to omit parallel roads and dominance of car parking.
- Appropriate connections and permeability to adjoining lands
- That a high quality landscape strategy for the site is provided. SuDS measures should be incorporated into the landscape proposals as appropriate.
- The documentation at application stage should clearly indicate how the 12 criteria set out in the Urban Design Manual which accompanies the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and the Design Manual for Urban Roads and Streets have been complied with.

Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

8.4 Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. A visual impact assessment that comprises a photomontage report with key viewpoints from locations in the vicinity of the site. Additional CGIs of the development when viewed along the R158 should be provided.
2. Landscaping proposals including an overall landscaping masterplan for the development site. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments should be submitted. Report should address measure to protect existing trees and hedgerows to be retained.

3. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances and boundary treatment/s. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long term management and maintenance of the proposed development. The use of render is not acceptable for the apartment blocks at this location.
4. A detailed schedule of accommodation which shall indicate compliance with relevant standards in the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018.
5. Childcare demand analysis and the likely demand for childcare places resulting from the proposed development.
6. School demand assessment.
7. A Building Life Cycle Report in respect of the proposed apartments as per section 6.13 of 'Sustainable Urban Housing: Design Standards for New Apartments- Guidelines for Planning Authorities' (2018).
8. A construction and demolition waste management plan.
9. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces, surface water management proposals and Part V provision.
10. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.
11. A detailed report outlining the any works to be undertaken to the R148 in terms of pedestrian and cycle facilities, public lighting and any road/footpath upgrade works necessary to facilitate the development and provide for appropriate connections to the wider area. The report should also detail who is going to undertake the works required and the timelines involved relative to the construction and completion of the proposed development. Details of areas to be taken in charge should be detailed. Letters of consent should be provided for any lands outside the control of the applicant.

12. Detailed design of proposed surface water management system proposed including attenuation proposals and cross sections of all SuDS features proposed on site in the context of surface water management on the site.
13. The information referred to in article 299B (1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.

8.5 Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. TII
2. National Transport Authority
3. Minister for Culture, Heritage and the Gaeltacht (archaeology)
4. Heritage Council (archaeology)
5. An Taisce — the National Trust for Ireland (archaeology)
6. Irish Water
7. Meath County Childcare Committee

PLEASE NOTE:

8.6 Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Erika Casey

Senior Planning Inspector

2nd March 2020