



An
Bord
Pleanála

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

**Inspector's Report on
Recommended Opinion**

ABP-305865-19

Strategic Housing Development	520 no. residential units (307 no. houses, 213 no. apartments), childcare facility and associated site works.
Location	Lands to the North of the Enfield Relief Road (R148) and to the west of New Road, Johnstown, Enfield, Co. Meath.
Planning Authority	Meath County Council
Prospective Applicant	Hayfield Homes Limited
Date of Consultation Meeting	18 th December 2019
Date of Site Inspection	12 th December 2019
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 14.77ha is located to the south of Enfield. It is currently in agricultural use and comprises 4 fields delineated by hedgerows. The site slopes gently from north to south. The southern boundary of the site abuts the Enfield Relief Road and the site currently has two access points to this road. To the north of the site, are the existing residential estates Glen Abhainn and Newcastle Woods. These estates primarily comprise detached and semi-detached housing and are suburban in character. The site has an existing agricultural access to New Road to the east. This road has a rural character and a number of one off rural dwellings are accessed from it further north. Na Fianna GAA Club abuts the site to the north east. The site is located c. 1.6km from Enfield Train Station.

3.0 Proposed Strategic Housing Development

3.1 The proposed development comprises:

- The construction of 520 residential units comprising 213 apartments and 307 houses. 21 different house types are proposed including apartments, own door duplexes, detached and semi-detached bungalows and semi-detached and terraced houses.
- Childcare facility with a floor area of 586.6 sq. metres. The crèche will have capacity for 146 children and 28 staff members. It will be served by a dedicated play area of 163 sq. metres.

- 20,822 sq. m. of public open space of which, 13,357.6 sq. m. is provided on the A2 lands in the form of pocket parks and 7,464.2 sq. metres is located on areas zoned Objective F1 Open Space. There is also an agreement in place with the GAA to provide the adjoining lands for the provision of an additional playing pitch.
- Infrastructural services including the provision of a foul water pumping station, a temporary wastewater treatment facility, a foul water pipe along the Enfield Relief Road and a raw watermain that will connect to the Irish Water installation.
- Provision is made to facilitate connectivity to the adjoining residential areas. At the northwest boundary, it is proposed to bring the internal access road to the site boundary to facilitate future connection to the Glen Abhainn residential area. It is also proposed to provide a pathway to the site boundary at the north of the site to facilitate a future connection to the Newcastle Woods development. It is stated that the applicant does not have control of these adjoining lands which appear to have been taken in charge by the Council.
- A total of 881 car parking spaces are proposed to serve the 520 proposed dwellings, including 13 disabled access spaces. Residential parking is provided at a rate of 2 spaces per house and 1 space per apartment/duplex with 1 visitor space provided per 4 apartment units.
- Bicycle parking is provided at a rate of 1 per unit for the proposed apartments/duplexes. Visitor parking is proposed at a rate of 1 space per 2 apartments units. 16 bike spaces serve the crèche.

3.2 The housing mix is as follows:

Unit Type	No.	Percentage
1 bed dwelling	77	15
2 bed dwelling	101	19
3 bed dwelling	222	43
4 bed dwelling	120	23

Total	520	100
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Key Parameters

Parameter	Site Proposal
Gross Site Area	14.77 ha
Developable Site Area	13.34 ha
Open Space	20,821 sq. m.
Houses	303 (58.3%)
Apartments	213 (41%)
Bungalow	4 (0.8%)
Density	39 units per ha
Plot Ratio	0.42
Site Coverage	22%
Crèche	586 sq. m.
Part V	On site – 52 units – 47 apts and 5 houses
Parking	881 spaces

4.0 Planning History

4.1 There is no previous planning history pertaining to the subject lands.

Other Relevant Permissions

Site to the east of New Road - ABP 304296-18

4.2 Permission granted by the Board in August 2019 for a Strategic Housing Development comprising 132 residential units and a crèche on lands located to the east of the site off New Road. The permitted scheme accommodated 74 no. houses

and 58 no. apartments and duplexes on lands zoned A2 and designated for Phase II (post 2019) release under the Meath County Development Plan 2013-2019. The permitted scheme had a density of c. 35 units per ha.

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 Government's 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. Relevant policies include NPO 4, 6, 11, 13, 18a, 18b & 35.

5.1.2 The NPF includes a specific Chapter, No. 6, entitled 'People Homes and Communities', which includes 12 objectives among 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').

- Design Manual for Urban Roads and Streets.
- Sustainable Urban Housing: Design Standards for New Apartments (2018).
- The Planning System and Flood Risk Management (including associated Technical Appendices).
- Childcare Facilities – Guidelines for Planning Authorities.
- Urban Development and Building Height Guidelines 2018.
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018.
- Framework and Principles for the Protection of the Archaeological Heritage Department of Arts, Heritage, Gaeltacht and the Islands 1999.

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.

5.3 Local Policy

Meath County Development Plan 2013-2019

5.3.1 The subject site is located in the administrative area of Meath County Council and the operative Development Plan is the Meath County Development Plan 2013-2019. Chapter 2 sets out the Core Strategy and Chapter 3 is devoted to the Settlement Strategy and Housing. The County Plan states that:

“Enfield has an advantageous location along the M4 and benefits from multi modal transport linkages with the town being served by a rail line. In this respect, car parking facilities at the railway station have been extended in recent years.

Opportunities to maximise the use of public transport infrastructure in the town should be taken and a greater integration of land use and transport should be promoted.”

5.3.2 Under the Core Strategy, Enfield is identified as a ‘Small Town’, but that having regard to its important locational advantage on the M4, the council will seek to advance its settlement status to a ‘Moderate Sustainable Growth Town’ through the new Eastern & Midland Regional Assembly. It is stated that the broad approach of the Development Plan for Small Towns is to manage their growth in line with the ability of local services to cater for growth and respond to local demand.

5.3.3 Under the Core Strategy, Enfield is designated a household allocation of 319 units at an average net density of 25 units per hectare. The quantity of residential zoned land required is stated as being 12.7 hectares. The plan notes that there is 37.9 ha zoned for residential use, an excess of 25.7ha. CS OBJ5 seeks to ensure that the review of Town Plans and Local Area Plans to achieve consistency with the core strategy of Meath County Council Development Plan 2013-2019 will only identify for release during the lifetime of the Meath County Development Plan the quantity of land required to meet the household projections. The overall goal is to achieve a model of sustainable urban development through the promotion of an appropriate range of uses and sensitive enhancement of the natural environment where healthy, vibrant and diverse communities can grow.

5.3.4 Relevant objectives for Small Towns are as follows:

SS OBJ 12 – *To ensure that Small Towns develop to cater for locally generated development and that growth occurs in tandem with local services, infrastructure and demand.*

SS OBJ 13 – *To ensure that Small Towns grow in a manner that is balanced, self-sustaining and supports a compact urban form and the integration of land use and transport.*

SS OBJ 14 – *To ensure that in Small Towns, no proposal for residential development should increase the existing housing stock (including permitted units) of the town by more than 15% within the lifetime of the Development Plan.*

5.3.5 **Volume 5** of the development plan includes a Written Statement and Land Use Zoning Objectives Map for a range of settlements in the county including Enfield.

Under the provisions of **Enfield Written Statement** the site is located on lands that are primarily zoned A2 (New Residential) with the following objective:

'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'.

5.3.6 The lands are identified for Phase II release (post 2019). A small section of the lands to the north are zoned FI (Open Space) with an objective *'To provide for and improve open space for active and passive recreational facilities'*. It is stated that the Planning Authority will resist the provision of new entrances onto the Enfield Outer Relief Road.

5.3.7 Strategic Policies identified for the town are as follows:

SP 1 – *To promote the future development of the town as a compact settlement with a pedestrian friendly environment, a legible and coherent physical form, and a variety of land uses and amenities.*

SP 2 – *To protect the unique character of the town through the provision of appropriate infill development which has regard to the scale, character, topography and amenities of the town.*

SP 3 – *To operate an Order of Priority for the release of residential lands in compliance with the requirements of CS OBJ 6 of the County Development Plan as follows:*

i) The lands identified as an A2 'New Residential' land use zoning objective corresponds with the requirements of Table 2.4 Housing Allocation & Zoned Land Requirements in Volume 1 of this County Development Plan and are available for residential development within the lifetime of the Plan.

ii) The lands identified as an A2 'New Residential' land use zoning objective but qualified as 'Residential Phase 11 (Post 2019)' are not available for residential development within the lifetime of this Development Plan.

5.3.8 Other relevant policies include:

Policy WWS POL2 - seeks to expedite the provision of the new waste water scheme and of an adequate water supply to allow development to proceed.

Land Use Policy LU POL 1 - regards the Relief Road as the southern boundary of the town of Enfield and seeks to protect the strategic function of this road.

Movement Policy MA POL 1 & 2 - seeks to support the improvement of existing rail infrastructure with increased suburban services to Enfield and Kilcock and seeks to encourage Iarnród Éireann to extend the commuter train service to Enfield.

5.3.9 In terms of social and community infrastructure, the plan identifies that the following are provided in Enfield – health centre, boat centre, leisure park, an oratory, Garda station, post office, soccer and GAA pitches.

5.3.10 The site is identified as a location for an archaeological site and monument.

Draft Meath County Development Plan 2020-2026

5.3.11 Under the draft plan, in the core strategy, Enfield is identified as a Self Sustaining Town. These are defined as *“towns with high levels of population growth and a weak employment base which are reliant with other areas for employment and/or services and which require targeted ‘catch-up’ investment to become more self-sustaining.”* It is stated that the focus of growth in the Self-Sustaining Towns will be on attracting employment and investment in services alongside a limited population growth and a more balanced delivery of housing. It is detailed that a density of up to 35 units/ha on lands in Self Sustaining Towns will be required. It is an objective of the plan under the CSOBJ9 to prepare an LAP for Enfield in the lifetime of the plan.

5.3.12 The vision for the settlement is:

“To support the sustainable consolidation of this multi-modal settlement with a balance of residential and employment development supported by its strategic location on the M4 Corridor and the availability of highly accessible lands suitable for employment and enterprise, whilst pursuing a continued pattern of development that respects the inherent characteristics of the natural and built environment.”

5.3.13 It is detailed that in 2016, that the town had a population of 3,239 persons. It is predicted by 2026, the town’s population will increase by 1,000 people to 4,239 persons. The plan provides a housing allocation of 474 units to Enfield over the 2020 – 2026 period. This includes 135 extant units permitted but not built. The plan states:

“The development framework in this Plan seeks to continue a pattern of

consolidation of settlement development generally within the limits of the Outer-Relief Road, and the Royal Canal. The overall residential land supply does not include residential infill or redevelopment opportunities or, the opportunity to provide for residential development ancillary to town centre uses. Therefore, in addition to the residential zoning, there are still other locational opportunities that have potential to offer additional residential supply and tenure choice. The Planning Authority is therefore satisfied that sufficient lands have been identified to accommodate the household allocation of 474 no. units.”

5.3.14 Relevant policies and objectives include:

ENF POL 1: *To support the sustainable consolidation of this multi-modal settlement with a balance of residential and employment development supported by its strategic location on the M4 Corridor and the availability of highly accessible lands suitable for employment and enterprise.*

ENF OBJ 1: *To secure the implementation of the Core Strategy of the County Development Plan, in so far as is practicable, by ensuring the household allocation for Enfield as set out in Table 2.11 of the Core Strategy is not exceeded.*

ENF OBJ 8: *To continue to support and facilitate the extension of the footpath and cycle path improvement works within the town.*

ENF OBJ 13: *Proposals for new residential development shall include detailed design measures to ensure that general layout arrangements, landscaping and open space provision is to facilitate connectivity with existing and new development areas.*

5.3.15 It is detailed in the plan that it is envisaged that the train service from the town will be upgraded to a DART service as outlined in the National Development Plan 2018-2027. Section 8.0 of the draft plan regarding Enfield sets out information regarding social infrastructure in the town. Lands to the east of the town have been identified for strategic employment development.

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, Design Statement, Architectural Drawings, Housing Quality Assessment and Schedule of Accommodation, Environmental Report, Correspondence regarding NIS, Landscape Strategy and Drawings, Transport Assessment, DMURS Statement of Consistency, Flood Risk Assessment, Engineering and Services Report, Engineering Drawings, Part V information, Planning Report and Statement of Consistency and Letter of Consent.

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 design statement submitted sets out how the proposed development complies with the 12 criteria set out in the Urban Design Manual.
- A range of units types are proposed which will meet the varied needs of the community and provide a greater housing mix in an area currently dominated by houses. All of the units meet and exceed the minimum floor area standards in the Apartment Guidelines. 56.7% of the proposed apartments are dual aspect. Ground level apartment floor to ceiling heights are compliant with the 2.7m requirement. The apartment blocks provide between 7 and 8 units per core.
- In accordance with the Childcare Guidelines, the development provides a facility that will accommodate in the order of 146 children.

- A Flood Risk Assessment has been prepared and this concludes that the site is within Flood Zone C. The proposed residential development is appropriate for the sites flood zone category.
- The development has been designed in accordance with the policy objectives of the NPF. The development occurs on a site immediately contiguous to the existing urban footprint of Enfield with strong connections proposed to existing residential and recreational land uses. The site is within 1km from the train station and bus stops. The proposal seeks to provide high quality housing, in a range of adaptable dwelling types at sustainable residential density within a town that is underperforming in respect of its core strategy housing allocation. The development is consistent with the objectives of the NPF in providing sustainable residential development within the existing settlement. It is also consistent with the policies and objectives of the Eastern and Midland Regional Assembly's Regional Spatial and Economic Strategy.
- The development is in accordance with the zoning objectives pertaining to the site under the Meath County Development Plan 2013-2019. The development is consistent with the overarching requirements of the Core Strategy and the Settlement Strategy by consolidating the built form in a manner that facilitates the growth of the town from a Small Town to a Moderate Sustainable Growth Town.
- Pedestrian movements are prioritised in the development through the provision of footpaths across the scheme and up to adjoining development. It is proposed to provide a public cycle path and footpath on the Enfield Relief Road to serve the existing and future residential community.
- 20,821 sq. m. of public open space will be provided across the site. In addition, there is an agreement with the GAA club to provide the lands to the immediate north of the subject site for the construction of an additional playing pitch. Therefore, the development will be served by active and passive open space.
- The land is zoned Phase 2 and development of the lands in advance of this represents a material contravention. Material contravention statement submitted.
- Note that 44 units have been permitted on the Phase 1 residential lands

between 2013 and 2019 representing a shortfall of 275 units on the Core Strategy requirements. Permission has been granted for a further 132 units under ABP Reference 304296-19. Even with the addition of these units, there remains an under provision of 143 units up to 2019. Residential development has not occurred on 7 of the 8 sites designated Phase 1 up to 2019. This has led to a significant under provision of housing with just 14% of the allocated dwellings provided as planned. This hinders the ability of Enfield to grow into a Moderate Sustainable Growth Town (with a population of 5,000 to 15,000). An additional 1,761 no. persons (652 units) would be required to reach the lower end of this growth target over the lifetime of the plan. It is considered that the development will contribute positively to meeting housing stock and population targets at the regional and national level.

- Consider that the policies and objectives of the plan conflict with the overarching objectives for Enfield in the Core Strategy and Settlement Strategy of the Meath County Development Plan that seek to support the sustainable growth of the town. It is considered that objective CS OBJ3 and Policy SP3 have prevented the release of Phase II (Post 2019) lands in Enfield that might otherwise have delivered housing units in accordance with the core strategy allocation. The objectives conflict with the settlement strategy to grow Enfield from a Small Town to a Moderate Sustainable Growth Town.
- With regard to section 37(2)(b)(iii), the development is consistent with national and regional plans and guidelines that facilitate the planning and sustainable development of the state and region. The proposal will contribute positively to achieving the goals of the NPF, the Action Plan for Homelessness and the RSES.
- Consider that the development is consistent with the existing and emerging pattern of development in Enfield. Note permission granted for a SHD application on residential A2 lands to the east of the site.

6.3 Planning Authority Submission

Planning Opinion

- It is the intention of the Council to advance the status of Enfield from a Small Town to a Self Sustaining Town. Note that the town is located on a multi modal

corridor with excellent road and rail access to Dublin via the M4 Motorway, the Dublin-Longford commuter rail line and is proximate to Maynooth University. Variation No. 3 of the current Co. Development Plan acknowledged this potential and sought the designation of Enfield as a Moderate Sustainable Growth Town. The RSES has provided a new typology for the regions towns and it is intended to designate Enfield as a self sustaining town in the draft County Development Plan 2020.

- Overview of residential lands in Enfield is provided. Notes that the core strategy allocation is 353 units. There is extant permission for 180 units of which 45 units have been constructed. There is a balance of 8.6ha of Phase 1 lands with no permission that would yield a potential 215 units. Including the completed units, the total capacity of the phase 1 lands would be 260 units.
- Notes that a material contravention statement is submitted with the application and that the Planning Authority is currently precluded from the consideration of residential development on A2 Residential Phase II lands within the current plan period.
- The Draft Meath County Development Plan 2020-2026 will go on public display on the 18th of December 2019 and it should be noted that the Executive of the Planning Authority does not propose to retain the entirety of the site as a residential zoning.
- It is considered that the proposal provides a good mix of dwelling types/design throughout the development.
- State that the quality and quantity of public open space should be assessed. Note that only 14% of public open space is proposed and while it is recognised that a GAA pitch is being provided, the land in question is zoned for F1 Open Space purposes and is located outside of the red line boundary. States that 15% open space should be provided on the residential zoned lands in line with current Development Plan standards.
- The PA would encourage the retention of existing hedgerow boundaries where possible. The PA would encourage durable material to all boundary treatments.

Traffic Impact, Access and Parking

- Notes inconsistencies in the Traffic and Transport Assessment. Consider that trip rates are of a lower order and should be revised. Distribution of traffic does not appear to relate to recorded movements. It would be assumed that a significant element of traffic generation would be attracted to the M4 motorway, however, the lack of traffic surveys undertaken along the route to the motorway would raise concerns that this hasn't been accounted for. Committed development should be considered in the traffic assessment.
- A review of the detailed junction assessment results contained within Appendix C raised concerns with regard to the geometry inputted into the model. In particular, the major road carriageway and minor traffic lane geometry for both models appear to be grossly overestimated. As such, an appropriate review of the traffic impact cannot be undertaken.
- It is noted that the applicant has suggested two potential future connections for pedestrian and cyclist facilities on the northern boundary of the site. The applicant has thus appropriately extended footpath connections directly to the site boundary. However, in order to provide certainty as to the future potential of these links, the Applicant should demonstrate that agreement in principle has been achieved through consultation with the adjacent landowners.
- The application should consider providing additional permeability links between the development and the R148. In particular, between the far western cul de sac and the R148 and at one of the cul de sac locations between the southern access junction and the New Road junction.
- A section of footpath provision has been provided along the New Road boundary adjacent to the subject site. The Applicant should consider extending this footpath provision northwards along the New Road towards its junction with the Dublin Road. Sightline drawings have not been provided for the key junctions.
- The street hierarchy appears appropriate. Swept path for internal junctions and the southern and eastern junction should be provided.
- The layout of the development appears to be dominated by cul de sacs with approximately 17 in total. In general, the provision of cul de sacs reduces permeability through sites and increases the occurrence of turning and

reversing manoeuvres. Cul de sacs are appropriate where they are short, 50m or less and where their provision omits a requirement for internal roads parallel to the external roads adjoining the site. As such the cul de sacs to the south of the development adjacent to the R148 are generally acceptable. However, the applicant should seek to remove the proposed cul de sacs within the northern portion of the site by connecting cul de sacs together forming through streets and/or by re-arranging urban blocks so that local streets are wrapped around them.

- Applicant should consider the provision of raised tables at selected internal junctions to provide an added degree of pedestrian comfort, safety and priority at crossing locations.
- The applicant should consider the provision of off line pedestrian and cycle paths within or around the development site in order to facilitate alternative pedestrian and cycle routes. Staff parking for crèche is required. Bicycle parking should be increased in line with the Apartment Guidelines.

Water Services, Wastewater Services and Surface Water Treatment and Disposal

- Details that there are a number of technical matters that need to be addressed prior to the submission of an application. State that the applicant has proposed to discharge surface water to an existing surface water drain and that the existence and capacity of the existing surface water drainage network should be investigated. The applicant shall engage with and secure the written permission of the Municipal District Engineer to access any surface water drain and shall undertake any remedial works to the existing surface water drainage network which the Municipal District Engineer considers necessary to facilitate the discharge from the proposed development.

Waste Management/Environmental Protection

- No details are provided as to the size of bins identified for the apartment buildings and there are no calculations to indicate that they are sufficient.
- The applicant will need to examine any emissions from the site during the construction stage and provide details of mitigation measures. The volume of

soil to be removed will need to be identified and consideration given as to how it will be removed.

- It is recommended that checks are carried out by a bat specialist, prior to the felling of trees.

Part V

- In order to promote a sustainable community within this proposed development, the Part V units should be better dispersed and pepper potted throughout the development. Additional houses instead of apartments should be provided.

Other

- Given the scale of the existing and proposed residential scheme in Enfield, request that the educational requirements arising from the proposed scheme are considered in order to ensure that adequate facilities are in place to cater for the future educational needs of Enfield's population.
- Residential development above 75 units shall incorporate works of public art.
- Applicant requested to supply maps prior to construction showing details of all ducting and access chambers for the entire development to show how connections will be made to existing networks.
- Conservation Officer raises no objection in relation to the proposal.
- Clarification sought regarding Site Specific Flood Risk Assessment.

6.4 Prescribed Bodies

Irish Water (12.12.2019)

- In order to serve the proposed development a new water source is required. The required water infrastructure includes bore hole, water treatment plan, pump station and reservoir. IW does not have the water service infrastructure in the area at present to cater for the development and these water upgrades are not on IW's Capital Investment Plan.
- IW have alerted the application that there may be the opportunity to serve the development from a new borehole on adjacent lands. Should this new source become available, the applicant will require a 200mm diameter watermain circa

845m extension with DMA flow meter to serve the development. IW has not entered into any agreement in respect of the provision of a new water source on lands adjacent to this proposal.

- In regard to wastewater, in order to accommodate the proposed connection to the development, upgrade works are required to increase the capacity of the existing Wastewater Treatment Plant. IW currently has a project on the investment plan which will provide the necessary upgrade and capacity. Detailed design sign off for Enfield Wastewater Treatment Plant is planned for Q1 2020.
- Prior to this, domestic treated effluent meeting discharges limits of Biological Oxygen Demand (BOD) 20mg/l and Total Suspended Solids (TSS) 30mg/l will be accepted into the Irish Water Network.
- The applicant has been advised they are required to seek planning permission and all other necessary approvals, provide, operate and maintain any private on site wastewater treatment plant at their own risk and that the treatment works will not be taken in charge by Irish Water. The operation of such treatment works by the applicant shall continue until such time as the proposed upgrade of the existing Enfield Wastewater Treatment Plant by Irish Water is completed and commissioned. The design of the private on site wastewater treatment plant should also include for the decommissioning and bypassing of the plant once the proposed upgrade of the existing Enfield Wastewater Treatment Plant is commissioned. Decommissioning and bypassing the private on site treatment plant will be the responsibility of the applicant and all costs borne by the applicant. Treated effluent failing to meet the above requirements will not be accepted into the Irish Water network.

6.5 Consultation Meeting

6.5.1 A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 18th of December 2019, commencing at 2.15 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:** compliance with the zoning and phasing requirements of the Meath County Development Plan 2013-2019 and the Draft Meath County Development Plan 2020-2026.
2. **Development Strategy:** with particular regard to overall site layout and architectural approach; distribution and layout of open space; development of GAA lands; road hierarchy and compliance with DMURS; connections and permeability; finishes and materials.
3. **Traffic and Transport:** with particular regard to adequacy of Traffic Assessment; access strategy; measures to address wider pedestrian, cyclist and public transport connectivity; interface with GAA site; car and bicycle parking.
4. **Drainage and Flooding**
5. **Crèche and Social Infrastructure**
6. **Any Other Business**

6.5.3 In relation to the **Principle of Development**, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The need to demonstrate that the subject lands are sequentially appropriate for development having regard to the core strategy, extent of zoned land, extant permissions and phasing strategy as set out in the Meath County Development Plan 2013-2019.
- The need to fully demonstrate that the development of the lands is appropriate having regard to the Draft Meath County Development Plan 2020-2026 and is in accordance with the Regional Spatial and Economic Strategy for the Midlands and Eastern Region.

6.5.4 In relation to the **Development Strategy** with particular regard to overall site layout and architectural approach; distribution and layout of open space; development of GAA lands; road hierarchy and compliance with DMURS; connections and permeability; finishes and materials, 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 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 to create a better sense of enclosure around the public spaces; integration of open space with existing and proposed GAA pitches.
- The need to create appropriate connections and permeability throughout the site and in particular how meaningful pedestrian and cyclist connections can be provided to the town centre along pedestrian desire lines;
- Road layout and design, the need for an appropriate hierarchy of streets and compliance with the principles of DMURS. Need to provide for better internal connections and permeability and reduce extent of cul de sacs and laneways between dwellings.
- Elevational treatment, design, finishes and materials for proposed apartment blocks including suitability and durability.
- Scope for additional height along the Inner Relief Road and the need to create a strong urban edge to the road. Potential for a more defined urban edge at the junction of the Relief Road and New Road.
- The need for a high quality landscape design having regard to the extent of open space within the site. The requirement for high quality boundary treatment along the Relief Road.

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

- Adequacy of the Traffic Transport Assessment and the need to respond to the technical requirements of Meath Co. Co.
- The appropriateness of vehicular access to the Enfield Relief Road in the context of Policy LU POL 1 of the current County Development Plan.
- Potential for an additional vehicular access from the Relief Road.
- Sightlines from the New Road Junction. Where the improvement of sightlines is dependent on the implementation of a separate permission, it should be clearly detailed that these can be achieved in tandem with the application.
- Pedestrian and cycle facilities and connections.
- The potential for the provision of a pedestrian footpath along New Road.
- The need to ensure that appropriate pedestrian connections and permeability with the GAA club can be facilitated.
- The requirement that all road improvements should be clearly indicated on all drawings and it should be clearly detailed in the application documentation regarding who will be responsible for their implementation and funding.
- Detailed design matters raised by Meath Co. Co.

6.5.6 In relation to **Drainage and Flooding** An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The need to address the concerns of Meath County Council regarding the adequacy of the surface water management measures including the design of the proposed attenuation system and capacity of existing surface water drainage network; SUDS measures proposed in the development;
- Scope to provide a greater variety of SUDs measures as part of the landscape strategy.
- Water infrastructure required and consent to access borehole on adjacent lands. Where the delivery of such infrastructure is dependent on third party lands, all necessary legal consents must be provided and it must be demonstrated that such infrastructure can be delivered in tandem with the development.
- On site Wastewater Treatment Plant and requirements of IW.

- 6.5.7 In relation to the **Crèche and Social Infrastructure**, An Bord Pleanála sought further elaboration/discussion/consideration of impacts to and adequacy of existing social and community infrastructure having regard to the scale of the development.
- 6.5.8 In relation to any **Other Matters**, An Bord Pleanála sought further elaboration/discussion/consideration of the following: Need for a Building Life Cycle Report, EIA and Part V.
- 6.5.9 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 '305865' 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:
- Justification for the development having regard to the provisions of the adopted Meath County Development Plan 2013-2019 and draft Meath County Development Plan 2020-2026 and in particular, the core strategy, the zoning objectives and phasing requirements pertaining to the lands set out therein; The need to demonstrate that the subject lands are sequentially appropriate for development.

- Development strategy including internal road network and wider pedestrian and cyclist connections, compliance with DMURS, open space strategy and interface with GAA lands, which are set out in the Recommended Opinion below.
- Traffic impact of the development and the appropriates of the vehicular access to the development having regard to the policies set out in the County Development Plan regarding the strategic function of the Enfield Outer Relief Road.

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. Principle of Development

Further consideration of documents as they relate to the Principle of the Development including a detailed report setting out:

- The rationale for the development of the lands having regard to their zoning for Phase 2 Residential (Post 2019) under the Meath County Development Plan 2013 – 2019. The report should assess the quantum and location of Phase 1 lands within Enfield which remain undeveloped. In line with the objectives of Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009), the report should investigate whether the subject lands are sequentially appropriate for development having regard to the extent of zoned land and extant permissions in the settlement.
- The report should also have regard to the provisions of the Draft Meath County Development Plan 2020-2026 and set out a justification for the development having regard to the draft core strategy and zoning provisions set out therein.

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

2. 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 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 interface between the site and adjoining GAA lands to ensure appropriate connectivity, linkages and boundary treatment.
- The overall design approach to the site to ensure that high quality materials and finishes are used throughout and distinct character areas are provided. The applicant should provide details of the proposed materials and finishes to the scheme including the treatment of balconies in the apartment buildings and duplex units, 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.
- Particular regard should be had to the design, height and siting of development to ensure an appropriate urban edge and treatment along the Inner Relief Road.
- The creation of an appropriate hierarchy of streets and full compliance with the principles of DMURS including a reduction in the extent of cul de sacs and laneways and reduction in excessively long internal streets.
- Appropriate connections and permeability to adjoining lands and the town centre along pedestrian desire lines including clarity as to how such connections can be meaningfully implemented.
- That a high quality landscape strategy for the site is provided.
- Extent of surface parking, bicycle parking and set down and parking requirements for the crèche.
- 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.

3. Traffic Impact

Further consideration of documents as they relate to the Traffic Impact of the development, in particular in relation to:

- Full justification for the vehicular access strategy to the site from the Enfield Inner Relief Road.
- Full assessment of traffic impact having regard to the comments raised by Meath Co. Co. in their technical report dated the 5th of December 2019. Traffic and Transport Assessment should include a Road Safety Audit and Quality Audit for the proposed development.

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 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.
2. Childcare demand analysis and the likely demand for childcare places resulting from the proposed development.
3. Social Infrastructure Audit including an assessment of 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.
4. 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.

5. 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).
 6. A construction and demolition waste management plan.
 7. 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.
 8. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.
 9. An Operational Waste Management Plan.
 10. A detailed report outlining the proposed works to be undertaken to the R148 and New Road in terms of pedestrian and cycle facilities, public lighting and any road 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.
 11. 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.
 12. Additional photomontages and CGI's of the development when viewed along the Inner Relief Road.
- 8.4 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 and nature conservation)

4. Heritage Council (archaeology and nature conservation)
5. An Taisce — the National Trust for Ireland (archaeology and nature conservation)
6. Irish Water
7. Meath County Childcare Committee
8. Inland Fisheries Ireland

PLEASE NOTE:

- 8.5 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

6th January 2020