



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report ABP-308155-20

Strategic Housing Development

513 no. residential units (304 no. houses, 209 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

Applicant

Hayfield Homes Limited

Prescribed Bodies

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. DAU

Observer(s)

9 submissions received. The list of names is attached as Appendix 1 to this report.

Date of Site Inspection

21.11. 2020

Inspector

Fiona Fair

Contents

1.0 Introduction	4
2.0 Site Location and Description	4
3.0 Proposed Strategic Housing Development	5
4.0 Planning History.....	8
5.0 Relevant Planning Policy	11
6.0 Section 5 Pre Application Consultation.....	17
7.0 Statement of Consistency	20
8.0 Third Party Submissions.....	29
9.0 Planning Authority Submission	31
10.0 Prescribed Bodies	40
11.0 Oral Hearing Request.....	44
12.0 Assessment.....	45
13.0 Recommendation	107
14.0 Recommended Order	107
15.0 Conditions.....	118

1.0 Introduction

This is an assessment of a proposed strategic housing development submitted to An Bord Pleanála under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

2.0 Site Location and Description

- 2.1. Enfield is located in the south of County Meath, between the M4, the Sligo/Longford railway line and the Royal Canal. The site is situated to the north of the Enfield Relief Road to the south of and contiguous to the town.
- 2.2. The site immediately adjoins existing residential lands including the Glen Abhainn and Newcastle Woods schemes in the northwest, and one-off dwellings fronting New Road to the northeast. At its northeast boundary the site adjoins the lands of Na Fianna (Meath) GAA Club. The southern boundary of the site is formed by the Enfield Relief Road (R148), from which the site currently has two access points. The site adjoins New Road at its eastern boundary and there is an existing agricultural gate onto this road. The Royal Oaks scheme is located further east.
- 2.3. Enfield is a multi-modal town served by rail, bus and the M4 Motorway. The site is within the 1-kilometre radius of Enfield Train Station which is served by the Dublin/Galway service and the Dublin/Sligo/Longford service. The town is also served by bus services including Bus Eireann Routes 20, 115, 115C, City Link Route 763 and Kearns Routes 845 and 847. There are public transport links from Enfield to Maynooth University, which is accessible by Train on the Sligo/Longford service or by Bus on Bus Eireann Routes 20, 115 and 115C while the Kearns Transport Routes 845 and 847 links Enfield to University College Dublin (UCD).
- 2.4. The gross application site area of 17.31 ha is irregular in shape and includes part of the Enfield Relief Road, New Road and the proposed GAA playing pitch. The net development site area of 13.47 ha is roughly triangular in shape. The site is currently in agricultural use and comprises 4 fields delineated by hedgerows. The site slopes gently from north to south towards the Enfield Relief Road. There are continuous footpaths along the Enfield Relief Road where it adjoins the subject site.

2.5. The site boundary includes lands that facilitate the upgrade of cycling and pedestrian facilities on the Enfield Relief Road, and water services infrastructure for the town to the east.

3.0 Proposed Strategic Housing Development

3.1. The proposed development will consist of the construction of 513 no. residential dwellings and a childcare facility on a total site area of 17.31 ha, and a development area of 13.47 ha. The proposed residential development comprises the following;

- 304 no. houses comprising:
 - 33 no. two-storey three-bedroom semi-detached houses 107.2sqm (Unit Type A)
 - 159 no. two-storey three-bedroom terraced house and semi-detached houses 114sqm (Unit Type C)
 - 3 no. two-storey three-bedroom semi-detached/ end of terrace houses 114sqm (Unit Type C1)
 - 21 no. two-storey four-bedroom semi-detached houses 132sqm (Unit Type B)
 - 1 no. two-storey four-bedroom detached house 132sqm (Unit Type B1)
 - 9 no. two-storey four-bedroom end-of-terrace houses 137.5sqm (Unit Types D1 & D2)
 - 72 no. two-storey four-bedroom mid-terrace/ semi-detached houses 137.5sqm (Unit Type D)
 - 2 no. two-storey four-bedroom mid-terrace houses 137.5sqm (Unit Type D3)
 - 4 no. single storey three-bedroom bungalow 94.4sqm-104sqm (Unit Types E1 & E)

- 161 no. Apartments arranged in 4 no. four-storey apartment buildings comprising a total of:
 - 75 no. one-bedroom apartments measuring 49sqm-59.9sqm (Unit Types A, A1, A2 & A3)

- 75 no. two-bedroom apartments measuring 77.9sqm-81.2sqm (Unit Types D & B)
 - 11 three-bedroom apartments measuring 100 sq. m (Unit Type C)
- 48 no. Duplex units comprising:
 - 24 no. two-bed units measuring 84sqm-87.4sqm (Unit Types F, G, K, L & P) and
 - 24 no. three bedroom units measuring 121.2sqm-125.2sqm (Unit Types H, J, M & N).
- A childcare facility (586.6sqm)
 - 2 no. new vehicular access onto the Enfield Relief Road (R148) including two right hand turn lanes with ghost islands; upgrades to pedestrian and cycling infrastructure on the Enfield Relief Road including the provision of a footpath, twoway cycle track, a verge and public lighting;
 - 886 no. car parking spaces and
 - 368 no. bicycle parking spaces;
 - all site and infrastructural works including foul and surface water drainage, attenuation areas, temporary underground wastewater treatment plant, foul pump station, open space, boundary walls and fences, landscaping, lighting, and internal roads; and, cycle paths, footpaths, cycle and pedestrian connections to the Enfield Relief Road, New Road and Newcastle Woods.
- 3.2. This application is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).
- 3.3. The application contains a statement setting out how the proposal will be consistent with the objectives of the Meath County Development Plan 2013-2019. It is submitted that the proposed apartments have been designed to fully accord with the Sustainable Urban Housing: Design Standards for New Housing 2018. A full Housing Quality Assessment is submitted which provides details on compliance with all relevant standards including private open space, room sizes and storage.

- 3.4. The proposed development is accompanied with a Material Contravention Statement which sets out justification for the proposed development.
- 3.5. It is submitted that the relevant considerations in respect of the current application relate to the phasing of the lands, being designated Phase II (Post 2019) in the current Meath County Development Plan 2013-2019, and the scale of the proposed development with reference to the existing housing stock in the town. Enfield is allocated 319 no. new units between 2013 and 2019 under the Core Strategy of the County Plan. The Plan prioritises the development of eight sites to accommodate these units during the Plan period and designates the remaining residential lands for development in the following Plan period ('post-2019'). Objective CS OBJ 3 states: "To operate an Order of Priority for the release of residential lands as follows: i) The lands identified with an A2 "New Residential" land use zoning objective corresponds with the requirements of Table 2A4 of this Development Plan and are available for residential development within the life of this Development Plan. ii) The lands identified with an A2 "New Residential" land use zoning objective but qualified as "Residential Phase II (Post 2019)" are not available for residential development prior to 2019". Similarly, Strategic Policy SP 3 of the Enfield Written Statement states: "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 with an A2 "New Residential" land use zoning objective corresponds with the requirements of Table 2.4 Housing Allocation & Zoned Land Requirements in Volume I of this County Development Plan and are available for residential development within the life of this Development Plan.
 - ii) The lands identified with an A2 "New Residential" land use zoning objective but qualified as "Residential Phase II (Post 2019)" are not available for residential development within the life of this Development Plan"
- 3.6. In addition, the Plan restricts the scale of new residential development in Small Towns with reference to the existing housing stock in the settlement. SS Obj 14 of the Plan states;

“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”.

3.7. The following tables set out some of the key elements of the proposed scheme:

Table 1: Development Standards

Site Area	Gross 17.31 ha / Net 13.47 ha
No. of units	513
Childcare Facility	586.6 sq. m capacity for 146 children
Residential Density / Net Density	38 units/ha
Public Open Space within Residential lands	13,037.8 sq. m
Public Open Space on Zoned Open Space Areas	8,062.1 sq. m
Total Public Open Space	21,099 sq. m (2.1 ha)
Communal open spaces	1,561 sq. m
Area for Playing pitch	20,647 sq. m
Dual Aspect	74% of Apartments 100% of Duplex's 100% of Houses

Table 2: Unit Mix

Description	Quantity	Mix %
1 Bed Apartment	75	14.6
2 Bed Apartment	75	14.6
3 Bed Apartment	11	2.1
2 Bed Duplex	24	4.7
3 Bed Duplex	24	4.7
3 Bed House	199	38.9

4 Bed House	105	20.5
Total	513	100%

27 housing types and variations are proposed.

Table 3: Car Parking

	Number of car parking spaces
Total No.	886
Houses:	608
Apartments & Duplex's:	209
Visitor:	52
Childcare Facility:	17

Residential car parking is provided at a rate of 2 spaces per house, and 1 space per apartment / duplex with 1 no. visitor space provided per 4 no. apartment units.

Table 4: Bicycle Parking

Bicycle parking spaces	368 228 long term bicycle parking spaces 118 short stay bicycle spaces. 22 bicycle spaces to serve the childcare facility.
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At a rate exceeding 1 no. space per apartment and 1 no. visitor space per 2 apartments.

Table 5: Part V

Proposed	51 (10%) units
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- 3.8. In term of site services, a new water connection to the public mains is proposed, together with a new connection to the public sewer. An Irish Water Pre-Connection Enquiry in relation to water and wastewater connections has been submitted, as required.

4.0 Planning History

4.1. None on the site itself.

Other Relevant Permissions

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

- Permission has recently been granted on lands to the east of the site, on the opposite side of New Road, under ABP Reference 304296-18. On 9 August 2019, the Board granted planning permission to Legendstar Ltd. subject to 26 conditions for a Strategic Housing Development comprising 132 no. units and a creche. This permitted scheme accommodates 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.
- ABP Ref: 308357 An application was lodged on 22nd January 2020 by Rybo Partnership (TA200058) for construction of 71 no. dwellings on phase II lands to the north of the Dublin Road. The application was refused planning permission on the 10/09/2020 and is currently subject to appeal with a decision date of 18/02/2021. The three reasons for refusal related to (i) premature having regard to existing deficiencies in the provision of an appropriate water supply, (ii) that the proposed development, as presented, which includes proposals to supply the development indefinitely with water from an interim private boreholes and treatment plan is not considered to be in accordance with the proper planning and sustainable development of the area and if permitted, is considered to have the potential to create an unacceptable risk to public health and will therefore create an undesirable precedent and (iii) premature having regard to deficient appropriate waste water supply.

5.0 National, Regional 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.

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) and contains two on site recorded and registered 'sites and monuments' (ME048-029 Johnstown Excavations and ME048-030 Johnstown Excavations). To the northeast of the subject site are 'Trees to be Preserved' (located within the F1 zoned Open Space area). A total of 7,464.2 sq. m (0.007 hectares) 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 wastewater 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 Iarnrod Eireann 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.

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.*

5.3.12 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.

5.3.13 Enfield is allocated a housing target of 474 units to 2026 (including 135 extant units). The lands are located within the development boundary for the town. The Objective F1 zoning is retained, as is part of the A2 residential zoning, now being Phase I. An area of the SHD application site is proposed for rezoning in the Draft Plan from Objective A2 'New Residential' to Objective RA 'Rural Area'.

5.3.14 A submission was made on the Draft Plan proposing the reinstatement of the Objective RA area as A2 'New Residential'. The CE's Report issued to the Members

in August and that part of the site zoned Rural Area in the Draft Plan is recommended to be rezoned back to 'Objective A2-New Residential' Phase 2 (post-2027) in the next Draft of the Plan. The Members will further consider the Draft Plan in October and amendments will go back on public display. It is anticipated that the new Plan will come into effect in May 2021, which it is further anticipated will be after the determination of the subject application.

6.0 Section 5 Pre Application Consultation

6.1. A Section 5 pre application (ABP – 305865-19) consultation took place at the offices of An Bord Pleanála on the 18th December 2019. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance.

Following consideration of the issues raised during the consultation process and having regard to the opinion of the planning authority, An Bord Pleanála was of the opinion that **further consideration and/or possible amendment** of the documents submitted are required at application stage.

6.2. Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the applicant was 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 arising from the notification:

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.

6.2.1. Summary of Revisions to Scheme Subsequent to ABP Opinion are summarised in the following points:

- The number of units has been reduced from 520 to 513. Number of houses proposed reduced from 307 to 304 and apartments / duplex's decreased from 213 to 209.

7.0 Applicant's Statement of Consistency

7.1. A statement of response to the Pre-Application Consultation Opinion was submitted with the application, as provided for under section 8(1)(iv) of the Act of 2016. This statement provides a response to each of the **three** issues raised in the Opinion.

Item No. 1:

7.1.1. Quantum and Location of Undeveloped Phase 1 Lands.

A full rationale for the proposed development of Phase II lands as supported by a planning history review of the Phase 1 lands in Enfield is provided in the Material Contravention Statement submitted with this application. In summary, it is submitted that to date residential development in Enfield has not been provided on the Phase I development sites as stipulated under the Development Plan and consequently Enfield has failed to achieve the housing allocation described in the Core Strategy up to 2019. Under the current development plan, eight sites were designated for Phase 1 development up to 2019.

The Core Strategy allocated 319 no. units up to 2019, to be accommodated primarily on the eight Phase I sites. A review of the planning history for Enfield identified that only 44 no. units have been permitted and completed on Phase I lands, creating a deficit of 275 no. units under the core strategy. As such, only 14% of the core strategy allocation in Enfield has been provided up to the end of 2019.

The lack of development on Phase I lands undermines the planned growth of Enfield into a Moderate Sustainable Growth Town, as stated in the County Plan. Further to this, the long-term undersupply of housing within this multimodal settlement contravenes the objectives of the National Planning Framework (NPF)

- The site is strategically located contiguous to existing and permitted residential development on serviced zoned lands. The site immediately adjoins the existing Newcastle Woods and Glen Abhainn developments to the west, the existing residential development on New Road and the recently permitted development at Royal Oaks to the immediate east. In this way, the site represents infill residential development as is it bound on both sides by existing and future residential areas.

- A proposed pedestrian connection between the subject site and the Newcastle Woods scheme increases permeability and access through this part of the town and facilitates connectivity to existing amenities and facilities in the town centre, approximately 400m from the subject site. Discussions are ongoing between the Applicant and Irish Water to facilitate an additional pedestrian connection north of the site to the Glen Abhainn development in the future.
- The site is well served by public infrastructure. There are existing bus stops on the Dublin Road that are located 400m from the subject site, serviced by Bus Eireann Routes 20 from Galway to Dublin Airport via Maynooth, 115 from Dublin City to Mullingar via Maynooth, 115C between Enfield and Longwood, City Link route 763 from Galway to Dublin Airport via Dublin City Centre, and Kearns Transport routes 845 from Birr to UCD via Dublin City Centre and 847 from Portumna to Dublin City Centre via Maynooth. Enfield Train Station is within 1km of the subject site and is served by the Dublin/Galway service and the Dublin/Sligo/Longford service.
- The subject site is well located with respect of social and community infrastructure. The Na Fianna (Meath) GAA Club immediately adjoins the site and it is proposed to provide an additional playing pitch for the club as part of the proposed development. The grounds of Enfield Celtic football club are to the northeast of the site on the Dublin Road. On 17 December 2019, the Minister for Education and Skills announced that a post-primary school to accommodate 500 students will be provided in Enfield in 2020. Policy CF POL 2 of the Enfield Written Statement indicates that the post-primary school will be provided on the G1 lands in the east of the town. These G1 lands are located in close proximity to the subject site, within 500m of the site along New Road.

It is submitted that the site is fully consistent with the sequential approach to zoning as advocated in National Guidelines.

7.1.2. Provisions of the Draft Meath County Development Plan

This Stage 2 Draft Plan amends the zoning objectives attributed to part of the subject site and other lands across the settlement. The western portion of the subject site is

now designated as a Rural Area. The Board may only have regard to the provisions of the current Development Plan in force at the time of the making of its decision. As detailed in the submitted Statement of Consistency and the Material Contravention Statement, the proposed development is consistent with the zoning objective in the current County Development Plan, and Ministerial Guidelines issued under Section 28 of the 2000 Act.

7.1.3. **Item No. 2: Development Strategy**

Open Space

7.1.4. The layout incorporates 21,099 sqm of open space distributed across the site, and characterised as follows: primary open space, secondary open space, tertiary open space, and communal open space. Security is provided to all open spaces through the location and siting of open space proximate to proposed housing providing passive surveillance.

- Three primary open space areas are located in the centre of the development, providing nature based play equipment and large open spaces providing amenity to all future residents.
- Communal open space provides an important privacy buffer between apartments and the public domain.
- Tertiary open space provides a solo function, assisting in creating attractive routes throughout the development for pedestrian movement.
- Pedestrian routes are orientated to provide attractive routes, with fitness equipment also provided along the pedestrian circulatory trail, providing activity for people of all ages and abilities.

Interface with GAA lands:

7.1.5. The development has been designed to 'wrap around' the proposed GAA pitch, placing the facilities as a focus and centre point for the town. Residential units have been located to provide a defined edge to the proposed GAA pitch, providing passive surveillance and also maximising the aspect provided by this amenity. A pedestrian link connects the site to the town centre via an access into Newcastle Woods. The proposed path traverses the open space to the west of the GAA pitch and continues

along its northern boundary. Electric gates will provide access from the development to the GAA club, one at its northern boundary, proximate to the Newcastle Woods entrance facilitating improved access for residents to the GAA club, and one entrance towards the north west of the pitch. The links are wide, well lit, and provided with an appropriate level of surveillance. A 1200 mm high railing on 600mm high brick faced wall is proposed to form the boundary between the GAA pitch and the proposed development, providing security for the GAA facilities while also enabling a visual connection between the residential development and recreational amenity. A new species hedgerow will be planted between the boundary wall and the open space with an area also left to develop as meadow to encourage biodiversity. The remainder of the open space adjacent to the GAA pitch provides opportunities for both passive and active recreation, including children's play equipment for nature-based play. The interface has been designed to provide security for both the GAA pitch and residential development, while also providing high quality physical and visual connections between the two uses.

Materials and Finishes

- 7.1.6. Materials and finishes have been chosen to ensure the longevity and high quality appearance of the proposed units. Brickwork will be the primary finish, its durability ensuring minimal maintenance requirements, with off white monocouche render used as a secondary material to add emphasis and create design interest. High quality materials are also proposed for hard surfaces associated with driveways and parking areas. This will ensure the sustainability of the development and provide for efficient long term management and maintenance of the site. Four character areas are proposed to create physical interest and encourage placemaking and wayfinding through the development. Each character area is defined by the choice of materials, variations in fenestration and other design elements.

Development fronting Enfield Relief Road

- 7.1.7. Four apartment blocks are proposed along the boundary of the site with the Enfield Relief Road with wide fronted two-storey units also proposed. The increased height of the apartment blocks, 2 no. 4- storey and 2 no. part 3-part 4 storey buildings, will create a strong urban edge to the development, with apartment blocks 2 and 3 located near the two access points providing a sense of arrival. Furthermore, the

frontage onto the Relief Road will assist in providing passive surveillance of the upgraded pedestrian and cycling facilities proposed. Connectivity will be provided by a series of additional pedestrian/cyclist entrances along the Relief Road, with the remainder of the boundary being formed of native hedgerow, shrub and tree planting, reflective of the wider character of the area.

Road Hierarchy and DMURS

- 7.1.8. A DMURS Design Statement of Compliance has been prepared by DBFL Consulting Engineers and is submitted herewith. In summary, the design of the internal road layout has evolved to deliver a well-designed street network providing safe, convenient and attractive networks, facilitating alternative transport to the car. The internal street network has been designed to deliver a clear hierarchy of streets. Local streets connect to the external arterial link street (Enfield Relief Road). And are further classified as primary and secondary local streets, with a small number of cul-de-sacs classified as homezones, where 10 to 12 residential units are located on to through roads. The internal road network has been designed with consideration to the context and place status of each residential local streets, ensuring suitable connectivity is provided with the needs of vulnerable road users, considered.
- 7.1.9. The Statement concludes that the proposed development is consistent with the principles and guidance outlined in the Design Manual for Urban Roads and Streets (DMURS).

Connections and Permeability (how these will be provided).

- 7.1.10. Two vehicular entrances are proposed to the development, both located along the southern boundary onto the Enfield Relief Road, proximate to apartment blocks 2 and 3. These also facilitate pedestrian and cyclist movement. A further 14 pedestrian and cyclist access points are located at various points along the site's perimeter. A pedestrian and cyclist link is provided to the GAA lands and to Newcastle Woods, providing a high quality link to the town centre and neighbouring residential development. Two pedestrian and cyclist access points are located on the eastern side of the site to New Road and a further 11 access points are located along the Enfield Relief Road ensuring maximum access and permeability for pedestrians and cyclists. The Applicant is in discussions with Irish Water regarding the provision of a second access on the northern boundary into the Glen Abhainn development. Future

pedestrian routes have also been facilitated to the west of the development site in anticipation of the future development of the adjacent lands.

Landscape Strategy

- 7.1.11. Landmark Design Landscape Architects has designed a comprehensive landscape strategy for the site incorporating 21,099 sqm of quality open space including pocket parks, privacy strips and Sustainable Urban Drainage Systems (SUDS). The submitted Landscape Design Rationale details this strategy which is focused on creating a hierarchy of public open space, incorporating primary and tertiary spaces providing mixed use areas with play equipment and pocket parks with sole purposes to meet the needs of the future residents of the proposed development. All spaces have been located to optimise accessibility from the internal street network, with pedestrian routes prioritised to ensure the maximum usability of spaces. Retained trees and vegetation will be supplemented by the planting of over 500 new trees, native hedgerows and a lower layer of shrub and bulb planting, complemented by meadow planting for areas where frequent mowing of grass will not be required.

Extent of Car Parking and Bicycle Parking

- 7.1.12. Car parking provision for the apartments/duplexes has been provided at a rate of 1 space per unit with additional dedicated visitor car parking spaces. The total provision equates to 262 no. car parking spaces facilitating a car parking ratio of 1.25 spaces per apartment. This provision is in accordance with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018). Car parking for the houses is provided at a rate of 2 spaces per unit in accordance with the standards of the Meath County Development Plan 2013-2019. Car parking for the creche is provided at a rate lower than the Development Plan standards as it is envisaged that the future creche will predominantly serve the needs of the proposed residential development. A drop off area and 17 car parking spaces have been provided to meet the expected needs of creche employees. Bicycle parking has been provided in accordance with the cycle parking guidelines contained in the Development Plan. 346 no. cycle parking spaces are required to serve the apartment units. This includes 228 no. long stay spaces provided in secure bicycle storage units and 118 no. short stay cycle spaces provided at street level. 22 no. spaces are also proposed to serve creche employees and visitors.

Design Criteria:

7.1.13. Section 4 of the Design Statement prepared by MCORM describes in detail how the 12 criteria of the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities have been complied with. A DMURS Statement of Consistency is also submitted with this application, prepared by DBFL and details how the criteria and guidelines contained within the Design Manual for Urban Roads and Streets have been complied with.

7.1.14. Item No. 3: Traffic Impact

7.1.15. DMURS promotes more frequent minor junctions to aid in the creation of a permeable street network. Two vehicular access junctions onto the Enfield Relief Road are proposed to serve the development having regard to the number of units proposed. It is submitted that the provision of two vehicular junctions and 11 no. pedestrian and cyclist accesses to the Enfield Relief Road will facilitate permeability for both pedestrians and cyclists while reducing traffic and potential issues for delay and queuing that could arise in a development of this scale if fewer accesses were provided. For both junctions, appropriate clear and unobstructed visibility splays have been provided. Furthermore, both junctions will be priority controlled with traffic calming measures, further increasing safety along the Relief Road. The DBFL documentation demonstrates that the inclusion of two junctions for access and egress provides the most appropriate solution to ensure ease of access and permeability for residents and visitors while also ensuring road safety and minimising traffic delays. A Road Safety and Quality Audit is submitted with this application. The RSA has helped inform the final design and layout of the development submitted, with all issues raised therein being fully addressed in the submitted designs to ensure the quality and safety of the internal and external road network, including accesses, of the development. A full assessment of the traffic impact, incorporating the observations in Meath County Council's Technical Note, has been undertaken and is presented in the Traffic and Transport Assessment submitted with this application. In response to the Technical Note, additional traffic surveys were conducted in February 2020 at the recommended junctions. Following detailed modelling and analysis, the Traffic and Transport Assessment concludes 'that there

are no traffic or transportation related reasons that should prevent the granting of planning permission for the proposed residential development.'

- 7.1.16. 12 Points of Specific Information were requested to be Submitted with any Application.

Point 1 - A detailed schedule of accommodation.

- 7.1.17. A Housing Quality Assessment has been prepared by MCROM to illustrate compliance with relevant design standards.

Point 2 - Childcare demand analysis

- 7.1.18. Future Analytics has prepared a 'Social Infrastructure Audit: School and Childcare Demand Assessment' that includes an assessment of demand for childcare arising from this proposed development.

Point 3 – A Social Infrastructure Audit

- 7.1.19. Future Analytics has prepared a 'Social Infrastructure Audit: School and Childcare Demand Assessment' that includes an assessment of demand for school spaces arising from this proposed development.

Point 4 - Landscaping Proposals

- 7.1.20. Landscaping proposals for the site have been prepared by Landmark Designs Ltd. Drawing No. P429-01 provides details on proposed hard and soft landscaping, play equipment, street furniture and boundary treatments. The report entitled Landscape Design Rationale provides details on tree and hedgerow protection. A Proposed Lighting Layout has been prepared by Signify.

Point 5 - A Building Life Cycle Report

- 7.1.21. A Building Life Cycle Report has been prepared by TMS Environment Ltd. in respect of the proposed apartments.

Point 6 - A Construction and Environmental Management Plan

- 7.1.22. A construction and demolition waste management plan in respect of the proposed development has been prepared by DBFL Consulting Engineers which details construction and waste management.

Point 7 – A phasing plan.

- 7.1.23. Drawing No. PL900 prepared by MCROM outlines a phasing plan for the proposed development.

Point 8 – Taking in Charge

- 7.1.24. Drawing No. PL900 prepared by MCROM outlines a phasing plan for the proposed development.

Point 9 – Operational Waste Management Plan.

- 7.1.25. An Operational Waste Management Plan for the proposed development has been prepared by DBFL Consulting Engineers

Point 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.

- 7.1.26. The Technical Note prepared by DBFL describes the proposed works to the public roads and outlines the timeline for their delivery. These works are also shown in Drawing Nos. 180082-2000 to 180082-2005 prepared by DBFL. These works form part of the proposed development and will be undertaken. Drawing No. PL901 prepared by MCROM shows those areas that are to be taken in charge by the Council.

Point 11 – Surface water management

- 7.1.27. Drawings Nos. 180082-3000, 180082-3001, 180082-3002, 180082-3003 and 180082-3004 prepared by DBFL provide details of the proposed surface water infrastructure. Further description is provided in Section 3 of the Infrastructure Design Report prepared by DBFL.

Point 12 – Photomontages and GCI's of the development when viewed along the Inner Relief Road.

7.1.28. CGIs of the proposed development have been prepared by G-NET 3D. Views No. 1, 2 and 3 show the proposed development when viewed from the Inner Relief Road.

8.0 Third Party Submissions

8.1. Nine number third party submission received, the list of names for submissions is attached as appendix to this report, they are collectively summarised under the following headings:

Principle & Compliance with Development Plan

- Proposal is premature pending the adoption of the updated Meath County Development Plan 2021 – 2027
- Part of the site is zoned rural in the Draft Plan 2021 – 2027
- The lands are not Phase 1
- Error in the Draft Plan - While the Draft Plan does list Enfield as a self-sustaining growth town, this is an error in the written statement. Enfield is a self-sustaining town.
- Welcome the development, given its central location to the town

Traffic

- Proposal will encourage and foster greater pedestrian and cycle connectivity around the town.
- Negative traffic impact on the Enfield relief road
- New road is a narrow laneway and is not capable of accommodating the level of traffic proposed.
- Over reliance upon private vehicle use
- Enfield is poorly served by public transport
- Concerns regarding pedestrian and cycling infrastructure
- Connectivity and direct line / desire lines of pedestrian / cycle access to town centre need to be considered.

- Raised table type junctions should be strategically placed at selected junctions.
- Vehicular access and home zones should be more carefully considered and incorporated.
- The proposed cycle path between the Johnstown Road and the New road is inadequate due to its abrupt ending on either side.

Services Infrastructure

- Lack of adequate water and wastewater services.
- Development premature until water supply is in place.

Urban Design, Density, Scale and Layout

- Concerns regarding the scale of the development, design & height and poor layout
- Concerns regarding proposed density
- More two bed units should be incorporated.
- Inappropriate mix of housing proposed.
- No requirement for 4 storey Blocks within the town.
- Height and design of the apartment blocks is inappropriate and would look completely out of place.
- Provision of active open space is positive addition.

Residential Amenity

- Negative impact upon existing residential amenity – security issues, in particular to ‘Angle Watch’, New Road Enfield a property to the north east of the proposed development.
- Concerns regarding overlooking to the garden area of ‘Angel Watch’ the closest dormer dwelling located to the north east corner of the site, along New Road.
- Concern with respect to proposed connectivity to Newcastlewoods Square, given the scale of the development.
- Noise Impact disturbance to public open space of adjoining estates.

- Concern for safety and disruption to residents in particular children who play in the green area of Newcastlewood.
- The pedestrian route through Glen Abhainn is not currently secured.
- Fear of anti-social behaviour to existing residents.

Inadequate Community and Social Infrastructure

- Insufficient childcare & School places
- Lack of play facilities
- Inadequate GP facilities.
- A community building is needed
- More detailed consideration and inclusion of children's play area, fitness trails and public art is required.

Other

- Part V - concerns regarding provision of part V all in one block of apartments
- Renewable Energy should be further engaged with i.e solar panels and geothermal energy.
- Electric charging points should be clearly outlined.
- Universal access is required.
- Commitment to high levels of energy efficiency.

9.0 Planning Authority Submission

9.1. In compliance with section 8(5)(a) of the 2016 Act the planning authority for the area in which the proposed development is located, Meath County Council, submitted a report of its Chief Executive Officer in relation to the proposal. This was received by An Bord Pleanála on 4th November 2020.

9.2. Summary of Planning Assessment:

Summary of the Chief Executive and Departmental Reports

Principle of the Development Proposal and Planning Policy

- 9.2.1. The Meath County Development Plan (CDP) has identified Enfield as a Small Town in its Settlement Hierarchy. The subject lands are A2 residential zoned lands (phase II lands). In the draft CDP it is the intention of the Council to advance Enfield's status from Small Town to a Self Sustaining Town.
- 9.2.2. While residential development is permitted on A2 New Residential Lands, the Planning Authority is currently precluded from the consideration of residential development on A2 New Residential/Residential Phase II (Post 2019) lands within the current Plan period. It should be noted that the Executive of the Planning Authority proposes to retain the entirety of the site as a residential zoning within The Draft Meath County Development Plan 2021- 2027.

Density, Layout & Phasing

- 9.2.3. The proposed density can only be considered acceptable if the assessment of the individual merits of the scheme in terms of residential amenity, capacity in infrastructure, integration with the surrounding area etc is positive. The issue of density is a matter for An Bord Pleanala in the determination of this application.

Design & Layout

- 9.2.4. It is considered that the proposal provides a good mix in terms of dwelling types/design throughout the development. The proposed development provides for a range of housing types including apartments, duplexes, two storey and bungalow houses. The proposed layout has been amended to provide greater connectivity within the development and with the adjoining GAA facilities.

- 9.2.5. The overall layout of the scheme is considered acceptable in terms of design. The development is generally in compliance with the Sustainable Urban Housing: Design Standards for new Apartments, 2018. The Board, however, should satisfy itself that the proposed apartment units meet the minimum required standards.

Open Space, Landscaping & Boundary Treatment

Public Open Space

- 9.2.6. The public open space areas are considered accessible and would benefit from passive supervision by residents. It is however considered that the layout proposed could be improved and enhanced with the provision of a playground and additional play facilities to serve future residents within the scheme. The Board is invited to consider the inclusion of same in their assessment.
- 9.2.7. The public open space areas have not been indicated as being Taking-in-Charge on the submitted site layout plan.

Private Open Space

- 9.2.8. A schedule of private open space has been provided by the applicant to demonstrate compliance with the private open space standards contained in the Meath County Development Plan 2013-2019.
- 9.2.9. The Planning Authority has reviewed the layout plan and is broadly satisfied that the proposal meets the required standards for private amenity space and separation distances. The Board, however, should satisfy itself that the proposed houses and apartments meet the minimum required standards.

Boundary Treatment

9.2.10. Boundary Treatment Details Drawing No.3 prepared by Landmark Designs Ltd relate to boundary treatments and are broadly acceptable. An Bord Pleanála is invited to consider appropriate Planning Condition(s) in respect of Boundary Treatment.

Access, Traffic, Parking & Public Lighting

Trip Generation and Distribution

9.2.11. Trip Generation has been estimated from a review of similar developments (i.e. Edge of town) identified within the TRICS database. The PM house and apartment trip rates are of a satisfactory level, however the trip rates provided for the AM peak for both Houses and Apartments are of a lower order than that which would be expected for a rural town such as Enfield. However, review of the traffic analysis indicates that the critical junction, being the R148 / R402 roundabout, is more critical in terms of capacity during the PM and thus during the AM peak is well within capacity and would appear to have sufficient reserve capacity if higher trips rates when applied during this peak. Therefore, in overall terms the application of these lower trips rates do not present a concern with regards to capacity of critical junctions during the AM peak.

9.2.12. The Applicant has distributed traffic in accordance with traffic patterns determined for the recorded traffic count information. This appears to be satisfactory.

Traffic Growth

9.2.13. Traffic growth factors have been taken from TII Project Appraisal Guidelines Unit 5.3 Travel Demand Projections. Central growth factors for the Mid-East area have been utilised. The growth factor applied is considered to be appropriate.

Traffic Impact

- 9.2.14. The Applicant's junction assessment is noted.
- 9.2.15. A review of the detailed junction assessment results contained within Appendix C raises concerns with regards to the geometry inputted into the model for the R148 / New Road crossroads junction. In particular the major road carriageway is inputted as 14.57m when in actuality it is only in order of 10m.
- 9.2.16. Notwithstanding in reviewing the level of traffic emanating from the minor roads and considering that the proposed development will not direct traffic onto either of these, it is not considered that there will be a material impact on this junctions capacity. All other models and results appear to be satisfactory.

Accessibility and Integration

- 9.2.17. In terms of the southern boundary of the subject site, the Applicant proposes to provide a two-way cycle track with adjacent footpath. This is an appropriate provision along a relief road.
- 9.2.18. A section of footpath has also been provided along the New Road boundary adjacent the subject site. The Applicant has not included the footpath within the Red Line Boundary. Clarification is need as to whether the Applicant is providing these works.

Junction Type

- 9.2.19. The layout of the junctions and crossing facilities provided appear appropriate and the geometric and numerical inputs and capacity outputs all appear to be appropriate.

Sightlines

- 9.2.20. As per the review (drawing 180082-2000) a sightline of 2.4m X 160m has been provided by the Applicant and appears to be appropriate.

Cul-De-Sac

- 9.2.21. The layout of the development consists of approximately 12 no. of cul-de-sacs in total. In general, the provision of cul-de-sacs reduces permeability through sites and increases the occurrence of turning and reversing manoeuvres that can be removed or at the very least significantly reduced.
- 9.2.22. Cul-de sacs are appropriate where they are short, 50m or less, and where their provision omits a requirement for internal development roads parallel to the external roads adjoining the subject site.
- 9.2.23. As such the cul-de-sacs proposed within the development are generally appropriate. However, it is considered that the Applicant should seek to improve the permeability within the eastern portion of the site continuing the east west spine to intersect with New Road to form a minor junction thereby improving permeability in this portion of the site.

Pedestrian and Cycle Links

- 9.2.24. The Applicant has provided appropriate pedestrian paths throughout the development and along with potential proposed connection demonstrating a good level of permeability for the pedestrian.
- 9.2.25. The Applicant should consider the provision of off-line cycle path links within the proposed development site in order to facilitate an alternative cycle route to connect to the external cycle provision other than using the proposed street carriageway. This would provide an alternative safe and comfortable route for less confident cyclists.
- 9.2.26. As per the review of the landscape drawings, it is noted that the Applicant has catered for the desire lines through the proposed development which is appropriate.

- 9.2.27. It is considered that the level of creche car parking provided should be sufficient to cater for employee parking. However, the current form of dedicated set-down area is inappropriate in terms of location, type and size. This set-down needs to be capable of catering for parents and indeed buses dropping off and collecting children for preschool, day care and after school minding services purposes. This set-down area should consist of adequately sized parallel spaces, the quantum and location of same to be agreed with Meath county Council.
- 9.2.28. The current location of the creche staff parking and dedicated set-down area directly adjacent to the eastern access junction and link is wholly unsuitable, and will give rise to road safety concerns in the form of the risk of collisions between traffic entering the development and cars departing these spaces, particularly, reversing movements out of the perpendicular spaces.
- 9.2.29. The staff parking spaces should be removed and relocated and the set-down addressed as noted above. The general car parking spaces located similarly adjacent to the western access junction should also be removed and relocated for the same road safety concerns.

Childcare Facility & Schools Assessment

- 9.2.30. The proposed SHD includes the provision of a 586.6 sq. m creche/childcare facility to the south of the site within proposed block 3. It has been stated (Declan Brassil & Company) that the proposed facility has the potential to cater for 146 childcare places. This is in excess of the 137 required childcare places.
- 9.2.31. It is considered that adequate outdoor play space has been provided for the childcare facility.

Estate Naming

9.2.32. An Bord Pleanála is requested to permit Meath County Council to approve the name of the new development, in the event of a grant of permission.

9.3. **Summary of Inter-Departmental Reports**

- **Housing Department:** The applicant has engaged with the Housing Department. The Housing Authority agrees in principle to the 51 Part V units proposed in this scheme.
- **Water Services:** Report Received: No objections subject to conditions.
- **Environment (Scientific Officer):** No Objection subject to condition.
- **Transportation Department:** Report received. No objection subject to conditions.
- **Heritage Officer:** Report received. No objections subject to conditions.
- **SEE Environment Section:** Flood Risk Management Report - No objections subject to condition.
- **Architectural Conservation:** A report has been received from the conservation officer. It states: No objections to the proposed development. Archaeological testing has been carried out; should this application proceed to a grant of approval it is recommended that a condition be attached requiring that archaeological monitoring is carried out for all site works.

9.4. **No Formal Recommendation has been made by the Planning Authority. The report concludes:**

9.4.1. 'An Bord Pleanála is respectfully requested to consider this Chief Executive's Report which is prepared in accordance with Section 8(5)(a) of the Planning and Development (Housing) and Residential Tenancies Act 2016 in respect of the above SHD application by Hayfield Homes Ltd. under section 4 of the 2016 Act'.

9.4.2. No overall conditions are recommended, in the CE Report, in the event that planning permission is forthcoming. Conditions are however attached to individual section reports.

Elected Members

9.4.3. A summary of the views of elected members as expressed at the Trim MD Meeting of 16/10/2020 is included in the Chief Executive's Report and is summarised below:

- Expressed the concerns of residents regarding the proposed pedestrian access through Newcastle Woods and the need to ensure residents are consulted and in agreement with regard to proposed pedestrian access.
- Expressed concerns regarding the capacity of the water and wastewater infrastructure to serve such a development, with water outages occurring in Enfield.
- Suggested that an additional or larger primary school would be required and queried the adequacy of community facilities to cater for such a development.
- Queried whether the development would meet housing need, e.g. the adequate provision of one bed units.
- Pointed out that the proposed Part V provision is centred in one block rather than being dispersed throughout the development.
- Referred to the need to provide adequate play facilities for children of different ages.
- Referred to the need to ensure that the proposed childcare facility is provided at the outset to avoid issues when units are occupied.
- Queried whether the proposed density was in contravention of the existing and proposed densities, as contained in the current and draft County Development Plans.
- Acknowledged the need for urgent delivery of housing and recognised the potential of Enfield in terms of its connectivity and as a strategic employment and enterprise centre.

- Referred to the need to reduce speeding through, e.g. the provision of raised tables at junctions.
- The need to ensure that adequate electric vehicle charging points are provided, including for apartments, with reference to the speed of the changing technology in this regard.
- Queried the consideration being given to broader social infrastructure requirements, e.g. GPs, post office, etc.

10.0 Prescribed Bodies

The applicant was required to notify the following prescribed bodies prior to making the application:

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

10.1. SUMMARY OF PRESCRIBED BODY REPORTS:

- 10.1.1. **Transport Infrastructure Ireland:** Submission received, and it states that TII will rely on the planning authority to abide by official policy in relation to development on/affecting national roads as outlined in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), subject to the following:

- The proposed development shall be undertaken strictly in accordance with the recommendations of the Transport (Traffic Impact) Assessment. Any recommendations arising should be incorporated as Conditions on the Permission, if granted. The developer should be advised that any additional works required as a result of the Assessment should be funded by the developer. Please acknowledge receipt of this submission in accordance with the

10.1.2. **National Transport Authority (NTA):** The NTA is supportive in principle of residential development in Enfield on the basis that such development would be served by public transport and would support the use of walking and cycling for local journeys.

Recommendations:

- That the proposed access points on the north-west boundary should be provided in the event of a grant of planning permission, and furthermore should be provided as part of the initial phases of delivery, i.e. earlier than Phase 6 (the link to Newcastle Woods) and Phase 9 (Future Potential Link), as appears to be proposed. In addition, all non-vehicular access points on the site boundary should provide for both walking and cycling.
- That car parking spaces in close proximity to junctions should be relocated. Should alternative locations not be available, the spaces should not be provided.
- That, within the site, the pedestrian and cycle route networks should be reviewed to ensure that desire lines are adequately provided for. Where these routes are off-road, they should be of sufficient width to accommodate two-way cycling, as detailed in the National Cycle Manual. On the R148, the design of the two-way cycle track should be revised where it crosses the site entrances, and should include the junction with Johnstown Road at its western end.

10.1.3. **Irish Water:**

In regard to water supply:

There are currently, significant water constraints in the area, however, to support development within the area, it is IWs intention to secure a land transfer and a new bore hole, currently under development as part of Planning Permission ABP-304296-18, by way of a Connection Agreement. When these lands and borehole are vested

to IW, it is IW's intention to install a temporary packaged Water Treatment Plant and an additional 600m³ storage tank reservoir on these lands to service further development and growth in the area. It should be noted that these elements of infrastructure can only be constructed and commissioned subject to lands being provided to Irish Water by the adjacent IW customer and land holder under ABP-304296-18. The landowner under ABP-304296-18 is also required to develop the lands to provide the necessary infrastructure to connect to the new packaged WTP on site which it is intended will service water supply for development in the wider area. IW is currently progressing outline designs in regard to the necessary infrastructure (pipework connection from borehole to packaged Water Treatment Plant container) and hard standing area for this WTP. Therefore, a public water connection development proposal ABP-308155-20 is contingent on the delivery of the following;

The applicant will be required to connect to the new water source providing additional drinking water capacity from bore hole(s) developed under planning reference ABP304296-18. The borehole development under ABP-304296-18 is to be handed over to Irish Water and adjacent lands developed. The water infrastructure proposed includes:

- Bore hole
- Water Treatment Plant
- Pump Station
- Storage tank/Reservoir

The borehole development and lands and water infrastructure including Water Treatment Plant, Pump Station and Reservoir will be vested to Irish Water as part of a self-lay agreement with IW under planning reference ABP-304296-18. As subsequent sites are developed in Enfield it is expected the newly vested WTP under planning reference ABP-304296-18 will need to be augmented and upgraded (it is intended, that as and when increased demand occurs an additional 600m³ storage tank will be provided on the lands vested to IW). A water connection for this development proposal could be completed as soon as possibly practicable after delivery of the water upgrades outlined above and to be delivered under planning reference ABP-304296-18. To serve this development proposal and connect to the

water infrastructure to be delivered under planning reference ABP-304296-18, a 200mm diameter watermain circa 845m extension with DMA flow meter will be required to serve the development from the new borehole on adjacent lands.

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 Enfield Wastewater Treatment Plant. Irish Water currently has a project on their current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by 2020/2021 (this may be subject to change) and the proposed connection could be completed as soon as possibly practicable after these works.

The applicant has been advised that prior to this, domestic treated effluent meeting discharges limits of Biological Oxygen Demand (BOD) 20 mg/l and Total Suspended Solids (TSS) 30 mg/l will be accepted into the Irish Water network. The applicant has been advised that they are responsible for all planning consents and all other necessary approvals to 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 applicants 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 of any private on-site treatment plant will be the responsibility of the applicant and at the applicant's cost. Treated effluent failing to meet the above requirements will not be accepted into the Irish Water network. The applicant has engaged with Irish Water in respect of design proposal for which they have been issued a Statement of Design Acceptance for the development. Therefore, Irish Water respectfully requests the Board conditions any grant as follows; The applicant must sign a connection agreement with Irish Water prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.

Reason: To ensure the adequate provision of water and wastewater facilities.

10.1.4. **DAU Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media:**

Archaeology

The archaeological component of the Environmental Impact Assessment Report (Chapter 13) submitted with the planning application has been considered. It is noted that the archaeological testing addressed the geophysical anomalies identified. On the basis of the information in the report and bearing in mind that large areas of the development site remain untested it is our recommendation that a planning condition pertaining to Archaeological Monitoring of ground disturbance and topsoil removal at construction stages be included in any grant of planning permission that may issue.

Nature Conservation

Having considered the documentation supporting the present application this Department notes that several trees and three hedgerows are to be removed to facilitate construction of the development as planned. Overall 500 trees are to be planted as part of the landscaping of the proposed development as well as native hedgerows along the boundaries of proposed open spaces within the development site. In the long term these plantings should therefore help minimise the impact of the development on biodiversity and are welcomed by this Department. However, the trees and hedgerows to be removed can be expected to harbour the nests of breeding birds in season. It is therefore recommended that a condition be attached to any grant of planning permission stipulating that works only be carried out in the period September to February inclusive ie. outside the main bird breeding season.

11.0 **Oral Hearing Request**

None requested.

12.0 Assessment

12.1.1. I consider that the key issues for consideration by the Board in this case are as follows: -

- **Site Zoning and Principle of the Development**
- **Height, Scale, Density, Layout and Design**
- **Residential Amenity**
- **Visual Impact**
- **Traffic and Transport**
- **Other Matters**
 - **Boundary Treatment**
 - **Community and Social Services**
 - **Services (Water and Wastewater Infrastructure)**
 - **Flood Risk**
 - **Part V**
- **Material Contravention Issue**
- **Environmental Impact Assessment (EIA)**
- **Appropriate Assessment (AA)**

12.2. Site Zoning and Principle of the Development

12.2.1. Having regard to the nature and scale of development proposed, namely a 513 no. residential units (304 no. houses, 209 no. apartments), childcare facility and associated site works, I am of the opinion, 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.

12.2.2. In the Meath County Development Plan 2013-2019 the site is subject to two zonings: The majority of the subject lands are zoned "A2" - New Residential (Phase II lands) with an 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."

12.2.3. A total of 7,464.2 sqm (0.007 hectares) of the north east corner of the site is zoned "FI" - Open Space with the objective;

- "To provide for and improve open spaces for active and passive recreational amenities".

12.2.4. The subject lands are not included within Phase I in the Order of Priority for Enfield as determined under Variation No. 2 of the Meath County Development Plan (2014) i.e. the Enfield Written Statement. Strategic Policy SP 3 (ii) is quite definitive in this regard-

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

12.2.5. The existing Meath County Development Plan (CDP) 2013-2019 has identified Enfield as a Small Town in its Settlement Hierarchy. The household allocation for 2013-2019 for Enfield is 319. Section 3.4.5 'Small Towns' contained in the Meath County Development Plan states 'Enfield has the potential to grow to a Moderate Sustainable Growth town over the lifetime of the County Development Plan having regard to its strategic location along the M4 'Knowledge Corridor' and on the Dublin/Sligo rail line and its proximity to Maynooth University. An opportunity to provide capacity for high end land hungry employment and secondary education facilities exists at the eastern end of the town'.

12.2.6. In the Draft CDP it is the intention of the Council to advance Enfield's status from Small Town to a Self Sustaining Town. The Forward Planning Section of Meath County Council state the following in relation to Enfield:

'Enfield 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. These advantages provide an opportunity to develop a 'live work' community in the town based on the principles of sustainable transport provision. Variation No 3 of the current County Development Plan acknowledges 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 2020-202. It is also the intention of the Council to prepare a LAP for the town post the adoption of the County Development Plan'.

12.2.7. It is noted that in the draft Meath County Development Plan for the period 2021-2027 it is not proposed to retain the entirety of the subject site as a residential zoning. A significant slice of the western portion of the lands is proposed to be changed from 'A2' Residential to 'RA' – Rural Area.

12.2.8. I highlight however that the Chief Executive Officers report submitted to the Board states: 'It should be noted that the Executive of the Planning Authority proposes to retain the entirety of the site as a residential zoning within The Draft Meath County Development Plan 2021- 2027'.

12.2.9. In addition to the Planning Report and Statement of Consistency, the applicant has submitted a Material Contravention Statement. This report states the proposal to bring forward the Phase II residential zoned land is a material contravention of the adopted County Development Plan. See section 3.5 of this report for details of the material contravention statement.

12.2.10. A review of the planning history of the Phase I sites was undertaken to ascertain the quantity of units permitted on Phase I lands between 2013 and 2019. Table 7 Summary of Planning History Review and Building Control Management System (BCMS) review of Phase I lands (August 2020) sets out the findings as submitted by the first party and undisputed by the planning authority.

Table 6

Phase I Housing Allocation 2013-2019	319 no. Units
Phase I Units Permitted 2013-June 2019	44 no. Units
Phase I Units with Commencement Notice	44 no. Units
Shortfall in the Delivery of Phase I Units to 2019	275 no. units

12.2.11. It is noted that the Board recently granted planning permission for 132 residential units and a creche on Phase II lands to the east of the subject site (ABP Reference 304296-18). This scheme is an extension of the existing Royal Oaks development and provides for a mix of residential units. Including these 132 units on Phase II lands, there remains an under provision of 143 permitted dwellings to meet the housing target for Enfield up to 2019. The first phase of development of the scheme permitted under ABP Reference 304296- 18 comprises 17 units that were due to commence construction on 2 December 2019. An additional 11 units as part of phase 1 were due to commence construction on 23 July. As such, none of the permitted Phase II units were delivered within the nominal life of the County Development Plan to 2019. It is further noted an application was lodged on 22nd January 2020 by Rybo Partnership (TA200058) for construction of 71 no. dwellings on phase II lands to the north of the Dublin Road. The application was refused planning permission on the 10/09/2020 and is currently subject to appeal ABP Ref: 308357, see Planning History section 4.0 of this report above. It is submitted that residential development has not occurred on seven of the eight sites designated Phase I up to 2019. This has led to a significant under provision of housing with reference to the Core Strategy, with just 14% of the allocated dwellings provided as planned. The absence of growth in the town between 2013 and 2019 also hinders the ability of Enfield to grow into a Moderate Sustainable Growth Town (with a population of 5,000 to 15,000), being a stated objective of the current Plan. For Enfield to advance to a Moderate Sustainable Growth Town its population will need to increase by 1,761 persons from the population of 3,239 recorded in the 2016 Census.

12.2.12. Enfield is allocated a housing target of 474 units to 2026 (including 132 extant units). The lands are located within the development boundary for the town and are currently zoned “A2” and “F1” respectively. Cognisance being had to the amendments proposed to date in the Draft Meath County Development Plan 2021-2027, the Board may only have regard to the provisions of the current Development Plan in force at the time of the making of its decision.

12.2.13. The submitted Statement of Consistency and the Material Contravention Statement, sets out how the proposed development is consistent with the zoning

objective in the current County Development Plan, and Ministerial Guidelines issued under Section 28 of the 2000 Act.

12.2.14. The proposed development materially contravenes Objectives CS OBJ 3 and SS OBJ 14 of the Meath County Development Plan 2013-2019. Section 9(6)(c), the Planning and Development (Housing) and Residential Tenancies Act, 2016, provides that the Board may grant planning permission for a proposed strategic housing development that is considered to materially contravene the Development Plan, other than in relation to zoning, then the Board may only grant permission in accordance with paragraph (a) where it considers that, 'if section 37(2)(b) of the Act of 2000 were to apply'. The matter of material contravention is discussed in detail in a subsequent section of this report, see section 12.8 below.

12.2.15. Overall, I am of the opinion that the proposed development is consistent with the zoning objective in the current County Development Plan and Ministerial Guidelines issued under Section 28 of the 2000 Act and is therefore acceptable in principle. The proposed development is consistent with the established and plan-led pattern of development in the area, and with the residential development permitted in the area since the making of the Development Plan. The proposed phasing plan has had regard to the current and draft plan zoning maps (noting that the western part is now recommended for Phase 2 residential zoning), with the later phases of development occurring on the western side of the town consistent with the sequential development of the town over subsequent development plans.

12.2.16. Development of the subject site accords with the sequential approach advocated in national and regional policy, providing for development to occur contiguous to the existing built footprint, well integrated with the established urban fabric, services, community infrastructure, and sustainable transportation modes.

12.2.17. In conclusion, I consider that the principle of the development is acceptable on lands within the development envelop of the town and on lands zoned to take account of the future expansion of Enfield. In tandem with and having cognisance to ABP-304296-18. I also accept that the current Phase 1 zoning provisions has failed to provide the number of residential units required under the core strategy and the proposed change in the settlement status of the town is likely to act as a catalyst for further growth and create a greater demand for housing to accommodate that growth. I agree that the proposed development will consolidate the towns compact and coherent urban form

and accords with national, regional and local policy which seeks to deliver a greater proportion of residential development and optimise use of under-developed land in existing built up areas.

12.3. **Height, Scale, Density and Layout and Design**

12.3.1. Some concerns have been raised, by third parties in their submissions, regarding the proposed height of the 4 storey apartments, scale and density, inappropriate mix of housing proposed and design and poor layout.

Height & Scale

12.3.2. I am of the opinion that the building heights and scale proposed respond to the Dept. of Housing, Planning and Local Government Sustainable Urban Development and Building Heights Guidelines for Planning Authorities (2018).

12.3.3. The proposed development incorporates a range of building heights from 1 to 4 storeys. Conventional houses are typically 2 storeys in building height with single storey dwellings provided to meet the needs of older or less able-bodied residents. Proposed apartment buildings 1 and 4 are four storeys and apartment buildings 2 and 3 are part three and four storeys. The introduction of three and four storey elements assists in ensuring a greater mix of building typologies are provided in line with wider demographic and household formation trends. Taller elements have been sensitively located adjacent to the Enfield Relief Road to create a strong urban edge, facilitate passive surveillance and strengthen character areas. In addition, the proposed building heights assist in achieving appropriate densities in accordance with the Residential Development in Urban Areas Guidelines..

12.3.4. The proposed development responds to the character of the Glen Abhainn and Newcastle Woods residential developments to the northwest, and the one-off houses onto New Road. At the northwest boundary it is proposed to align the rear gardens of the proposed dwellings with those of existing developments to create suitable separation distance between houses and securely enclose both the existing and proposed rear garden areas. It is proposed to align the gable ends of the proposed dwellings with those of existing dwellings to protect the privacy of existing dwellings and to maintain existing building lines. The proposed development incorporates duplexes and 4 storey apartments in a manner that is consistent with the emerging residential character of this area.

12.3.5. The approach to building heights is in line with the guidance given in the document “Urban Development and Building Height – Guidelines for Planning Authorities”, December 2018. These guidelines set out criteria for building height in Suburban / Edge locations (City and Town). I note Paragraph 3.6 which states “development should include an effective mix of 2,3 and 4 storey development which integrates well into existing and historical neighbourhoods...” The applicant respectfully submits that the proposal adheres fully to the criteria set out in this document and have sensitively increased the scale gradually towards the wide carriageway of the Enfield Relief Road giving the new scheme an appropriate presence along this street. In addition this approach to scale also safeguards the privacy and amenity of all existing residents at this location.

12.3.6. Development of the subject site at the scale proposed will facilitate the sustainable growth of Enfield, a town serviced by rail and bus services and proximate and accessible to major employment centres and Maynooth University. It will provide a critical mass supporting the ongoing expansion of services and infrastructure to the town and its development toward a Self-Sustaining Town/Self-Sustaining Small Town status.

Density

12.3.7. The proposal has a density of 38 units/Ha and has had full regard to the existing and emerging pattern of development within Enfield and maximising connections and accessibility to the town.

12.3.8. The Strategic Housing Development recently permitted under ABP-304296-18 on the eastern side of New Road accommodates a mix of dwelling types including houses, duplexes and apartments at a residential density of 35 units per hectare. This current proposal similarly seeks to provide a mix of dwelling types, at a sustainable density to make efficient and sustainable use of these zoned and serviced lands.

Layout and Design

12.3.9. The proposed layout comprises of 4 main character areas. The proposal provides a good mix in terms of dwelling types/design throughout the development. The proposed development provides for a range of 27 housing types including apartments, duplexes, two storey and bungalow houses.

12.3.10. It is proposed to facilitate connectivity across the site and to adjoining residential and recreational areas. A pedestrian and cycle link is proposed at the northwest boundary of the site to connect with the existing Newcastle Woods development. This will be provided by a pathway within the subject site that will lead through proposed landscaped areas, past the proposed GAA playing pitch and up to the existing connection into Newcastle Woods. It is understood that the public areas in Newcastle Woods are under the control of the Council and therefore the provision of a connection through the existing gate is achievable. It is proposed to provide an additional pedestrian and cycle link to the Glen Abhainn development by constructing a footpath up to the boundary of the Glen Abhainn development at the Irish Water facility. It is submitted that the applicant and landowners are currently engaging with Irish Water with the view of delivering a pedestrian linkage into Glen Abhainn through the recently permitted Irish Water facility. The proposed layout provides good connectivity within the development and with the adjoining GAA facilities. The scheme wraps around what will be an enlarged GAA facility. The enlargement of this facility is proposed as part of the subject planning application. I agree that this renders it a more central community facility surrounded by the new neighbourhood proposed rather than a peripheral amenity at the edge of town.

12.3.11. The proposed development if permitted would deliver a quality living environment to serve the needs of residents. It would deliver a range of housing units, which vary in size, type and tenure, with strong character areas, to accommodate a broad population profile. It is generally designed with the aim of creating a walkable neighbourhood which facilitates as a priority travel for pedestrians and cyclists and links the development back to the town centre. It is critical that the pedestrian footpaths, connections and cycleways are delivered in tandem with the development as they represent a direct means of transport around and into the town centre. There are 17no. connections for pedestrian/cycle links to the Enfield Town Centre and its facilities will be available to the residents of the new scheme. The public open space includes traversing paths, which follow pedestrian desire lines. The access roads have been designed with the aim of creating streets and with a priority for pedestrians and cyclists. Traffic calming measures are designed into the road layout. The open space, roads, footpaths and cycleways are overlooked by houses and house design turns corners, create active frontages and

provide passive surveillance, therefore, I am of the opinion the overall layout is acceptable in terms of design.

12.4. Residential Amenity

12.4.1. Concern has been raised by third parties with respect to negative impact upon existing residential amenity, overlooking and security issues, in particular to 'Angle Watch', New Road Enfield (a property to the north east of the proposed development). Concern has also been raised with respect to connectivity to Newcastlewoods Square in terms of noise impact, anti-social behaviour / disturbance of public open space and general disruption to residents and children who use and play in the green area of Newcastlewoods Square.

General

12.4.2. A mix of houses and apartments up to 4 storeys in height immediately face the expanse of the Enfield Relief Road. Although taller than the typical established height of residential development in Enfield the 3-4 storey apartment blocks coupled with wide fronted 2 storey plus pitched roof houses will form a strong built edge to this boundary. Good passive surveillance is also thereby ensured. As one moves northward into the site itself the scale of the built form reduces to predominantly two storeys to match the established scale of the neighbouring housing estates. These houses where they back onto the boundary with Glen Abhainn achieve a minimum separation distance of 22 m between opposing first floor windows in all cases. A cluster of three single storey dwellings has been designed to reduce the scale of building adjacent to the existing dormer bungalow at the north eastern corner of the site onto New Road, abutting 'Angle Watch'. A similar low-rise unit is proposed along the Glen Abhainn boundary as part of a shared street grouping at this location. I agree that such variations in scale assist in safeguarding the amenities of existing residents while also providing variation and visual interest across the scheme.

12.4.3. Permeability through the site has been reinforced by the proposed pedestrian routes throughout the site which ensures that the site remains well connected to the area and its surroundings. Future permeability and connections to adjacent lands have been provided for. The strong principle frontages, strong streetscape elements, high quality materials and landscaped areas used throughout the site create a scheme

that adds specific character and identity at this location. I agree that layout, design and connectivity proposed results in a residential scheme that is well connected and integrated with its surroundings and which has been designed to be attractive, desirable and safe for residents and members of the future community. While the concerns of existing residents are noted, I believe creating an inclusive and well connected neighbourhood is wholly desirable. The issue of anti-social behaviour may well never arise and in any case is a matter for An Garda Síochána.

Proposed Apartments

- 12.4.4. The proposed apartments have been designed to accord with the Sustainable Urban Housing: Design Standards for New Apartments 2018 (“the Apartment Guidelines”). A Housing Quality Assessment is submitted which provides details on compliance with all relevant standards including private open space, room sizes, storage and private amenity areas. I have reviewed the apartment types and sizes proposed against the apartment design standards set out in the Apartment Guidelines (2018) and I am satisfied that minimum standards have been met and the proposed development is acceptable in this regard.
- 12.4.5. The orientation of the proposed development has been designed to ensure that all of the proposed units achieve adequate levels of daylight/sunlight throughout the year. C. 74% of the proposed apartment units are dual aspect which is deemed acceptable given the location of the site, street frontage proposed, orientation of the blocks and high-quality design proposed. The majority (64%) and own door apartment units exceed the minimum area standards of the Guidelines by 10%.
- 12.4.6. The apartment blocks 2 & 3 have an efficient layout with 7 units per circulation core together with blocks 1 & 4 having 8 units per core.

Proposed Houses

- 12.4.7. All houses will be provided with a private rear garden with an area compliant with the Meath Co. Council Development Plan. The minimum provision of 60m² for a three bed and 75m² for a 4 bed has been met. Apartments and Duplex units will have private balconies or terraces in each case. The sizes provided comply with the minimum standard set out in the Design Standards for New Apartments, March 2018. A separation distance between opposing first floor windows of houses of 22m

min. has been provided for by the design of the scheme. In the case of certain house types (A and B) they do not have rear bedroom windows at first floor level and bathroom windows are proposed to be obscure glazing, the separation distances between units has been reduced slightly as overlooking is not an issue. In the case of these house types, the minimum garden areas are still achieved as they are wider than the more standard house types proposed.

Conclusion

- 12.4.8. Permeability through the site has been reinforced by the proposed pedestrian routes throughout the site which ensures that the site remains well connected to the area and its surroundings. Future permeability and connections to adjacent lands are desirable and have been provided for, concerns of local residents are noted in this regard but connectivity and place making, passive surveillance and creating sustainable communities far outweigh any possible or perceived antisocial issues, which are outside of the remit of this planning application. Overall I consider that the proposed development would result in a residential scheme that is well connected and integrated with its surroundings and which has been designed to be attractive, desirable and safe for residents and members of the existing and future community.
- 12.4.9. The set back off the northern boundary and the design, height and layout of proposed dwellings addressing the Glen Abhainn and Newcastle Woods existing residential developments as well as the dwellings along New Road is well considered. The design and layout has cognisance to existing residential amenity and results in a residential scheme that will not impact by way of overlooking, over shadowing or overbearing for existing residents.

12.5. **Visual Impact**

- 12.5.1. There are currently no structures on the subject site. The lands are predominantly greenfield in character. The built fabric of the contiguous lands are contained to the east and north of the subject site. These built structures are a mix of single storey and two storey residential properties of Glen Abhainn and Newcastle Woods. The lands to the south and west are comprised of series of agricultural fields compartmentalised by tree and hedgerow plantings. Generally, open unrestricted views occur along the Enfield Relief Road, R148 from the southeast, south and

southwest. Otherwise views into the site are restricted by residential development to the east and north and intervening.

12.5.2. I am of the opinion that the proposed buildings are of high quality, well designed and would be an addition to the surrounding built environment. The development as a whole is well considered and would make a positive contribution to the urban neighbourhood and streetscape. The CGI's, photomontages and visual impact assessment submitted with the planning application indicates that the impact of the proposal on the area will be neutral. I agree that the design of the Houses and Apartment Blocks are of high quality and make a positive contribution to the wider area.

12.6. Traffic and Transport

12.6.1. It is noted that a number of representations from local residents raised concerns relating to negative traffic impact on the Enfield relief road and New road. Over reliance upon private vehicle use, lack of accessible public transport, inadequacy of pedestrian and cycling infrastructure has also been raised in conjunction with deliverability of direct line / desire lines and pedestrian / cycle connectivity / access to the town centre.

The Enfield Road (R148) and New Road

12.6.2. The R148 is a regional road, of 7m wide carriageway with hard-shoulders/strips and grass verges on both sides, to the south of Enfield town centre it acts as a relief road to the town. There is an existing footpath provided on the north side of the road. New Road is a narrow lane with numerous private accesses that runs to the west of the subject site and lacks any pedestrian facilities along its extents. Johnstown road lies to the west of the subject site, but does not directly abut it, with footpaths on both sides of the road and public lighting provided. It connects the R148 to Enfield town centre. There are no dedicated cycling facilities in the adjacent surrounding area. Enfield town centre is well facilitated with pedestrian paths, public lighting and crossings. Two no. pedestrian and cyclist accesses associated with the main vehicular access onto the R148 Enfield Relief Road are proposed onto the southern boundary of the site and two 2 no. dedicated pedestrian/cycle access are proposed onto New Road on the eastern boundary of the site.

12.6.3. In terms of the southern boundary of the subject site, it is proposed to provide a two-way cycle track with adjacent footpath. This is considered by the transportation department of Meath County Council to be an appropriate provision along a relief road. A section of footpath / cycle path is also proposed along the New Road boundary adjacent to the site. The planning authority has raised concern that the proposal does not include the footpath along New Road within the Red Line Boundary. I note for the attention of the Board that Point 10 of the applicant's statement of consistency submitted with the application states: 'these works form part of the development and will be undertaken.' I consider that the issues raised can be dealt with by way of condition and compliance and are not reasons for refusal of the proposal. Full clarity is need as to who is providing this footpath and all road works. This can be dealt with by way of condition, it is my opinion the footpath should be delivered / paid for by the applicant in tandem with the overall development, given the scale of the development and need of connectivity to the wider area. Its construction should be to the satisfaction and agreement of the planning authority. This is not disputed by the first party.

12.6.4. The transportation Section of Meath County Council have not raised any objection in principle to the proposed development and are positive in respect of traffic impact overall. Issues are raised, however, with respect to red line boundary, construction and delivery of a footpath on New Road, permeability within the eastern portion of the site continuing the east west spine to intersect with New Road to form a minor junction thereby improving permeability in this portion of the site and raised tables at selected internal junction to aid speed management. The technical note prepared by DBFL describes the proposed works to the public roads and outlines the timeline for their delivery.

Accessibility and Integration with Public Transport and Town Centre

12.6.5. Enfield is served with three Bus Eireann services, one city-link service and a private coach company, Kearns Transport services.

12.6.6. In addition, Enfield Rail station is located north-west of the proposed development and it provides commuter services eastwards to Dublin Connolly Station and north-west to Mullingar, Longford and Sligo.

12.6.7. The first party submits that that the site is within 400m of the town centre and bus stops on the Dublin Road, and within 1 km of Enfield Train Station. The NTA report accurately points out that the distances are calculated on the assumption that the pedestrian connections on the north-west boundary are available. Should the new connections not be delivered, the distances from the subject site to local services and public transport would be between 1.5 km and 2 km, which exceeds the recommended catchment. The delivery of these new connections to the adjacent housing areas is therefore of critical importance to support the use of public transport for longer distance journeys, and walking and cycling/or trips to the town centre.

12.6.8. The following pedestrian and cyclist access points are proposed for the development:

- 11 no. dedicated pedestrian and cyclist accesses on the R148 Enfield Relief Road on the southern boundary of the site;
- 2 no. pedestrian and cyclist accesses associated with the main vehicular access onto the R148 Enfield Relief Road on the southern boundary of the site;
- 2 no. dedicated pedestrian/cycle access on New Road on the eastern boundary of the site;
- 2 no. potential future connections access on the South-West boundary of the site;
- 1 no. potential future connection towards Glen Abhainn Lawns on the northern boundary of the site.
- 1 no. dedicated pedestrian and cyclist access to Newcastle Woods Square on the northern boundary of the site.

*The planning authority, the NTA and third parties have concerns with respect to the applicant's commitment and rights with respect to delivering the potential pedestrian and cycle connections to the north of the site. The planning authority's CEO opinion requests that the applicant demonstrate that an agreement in principle has been reached with the adjacent landowner for the future provision of both connections so as to provide certainty for their delivery.

- 12.6.9. See paragraph 10.1 of this report above for specific details of the NTA report which is in the main positive towards the proposed development. It submits that the NTA is supportive in principle of residential development in Enfield on the basis that such development would be served by public transport and would support the use of walking and cycling for local journeys. I note in particular that their report sets out that the proposed access points on the north-west boundary should be provided in the event of a grant of planning permission, and furthermore should be provided as part of the initial phases of delivery.
- 12.6.10. I do not consider it acceptable that the phasing plan for the development indicates the proposed pedestrian / cycle links to the north as part of phase 6 and phase 9 of overall 11 phases. The link to / via Newcastle Woods should be provided within phase 1 and future potential link via / to Glen Abhainn Lawns, as appears to be proposed in phase 9, should be brought forward, subject to agreement with the planning authority. Having reviewed the phasing plan in detail and regard being had to sequential development of the town, links and integration, I recommend that phases 6 and 9 should be constructed as phases 4 and 5 i.e. the links provided in tandem with the earlier phases of the development.
- 12.6.11. I agree that the site / Enfield is adequately serviced by public transport to support this development provided the links proposed are delivered. Therefore I recommend that a condition be attached to any grant of planning permission requiring that prior to the commencement of any development on this site the developer shall demonstrate to the written satisfaction of the planning authority that agreement has been achieved with the adjacent relevant landowners in order to provide certainty of access with regards to potential future pedestrian and cycle access points to the north of the site. I also recommend that phasing of the development, having cognisance to need to prioritise potential links and connectivity to the north and the town centre, should be agreed in writing with the planning authority prior to the commencement of any development on this site.
- 12.6.12. It is proposed to provide a two-way cycle track with adjacent footpath along the southern boundary of the subject site. The planning authority consider that this is an appropriate provision along a relief road. Appropriately sized and located pedestrian paths are proposed throughout the development and along with potential proposed connection demonstrating a good level of permeability for the pedestrian.

The planning authority consider that the provision of off-line cycle path links within the proposed development site, should be considered, in order to facilitate an alternative cycle route to connect to the external cycle provision other than using the proposed street carriageway. This would provide an alternative safe and comfortable route for less confident cyclists.

12.6.13. The NTA submit that the pedestrian and cycle route networks within the site should be reviewed to ensure that desire lines are adequately provided for. Where these routes are off-road, they should be of sufficient width to accommodate two-way cycling, as detailed in the National Cycle Manual. On the R148, the design of the two-way cycle track should be revised where it crosses the site entrances and should include the junction with Johnstown Road at its western end. In addition, all non-vehicular access points on the site boundary should provide for both walking and cycling. Again, I consider that these matters can be dealt with by way of condition should planning permission be forthcoming.

12.6.14. As referred to earlier in this report a new footpath is also proposed along the New Road boundary adjacent to the subject site. The planning authority report states that clarification is need as to whether the applicant is providing these works. This matter, I consider, can be resolved by way of condition should planning permission be forthcoming. The developer in their statement of consistency have indicated a willingness to carry out necessary works benefiting and considered part of the overall development. It is my opinion that the onus is on the developer to undertake the construction and cost of the provision of a new footpath along New Road, as per the plans and drawings submitted, to the written agreement and satisfaction of the planning authority.

Car Parking

12.6.15. 886 No. car parking spaces are proposed for the subject development site comprising of:

- 608 No. spaces for house type dwellings;
- 209 No. spaces for apartment type dwellings;
- 52 No. visitor spaces for apartment type dwellings; and
- 17 No. spaces for the creche.

12.6.16. The provision for house units is in accordance with the Meath County Development Plan whilst the provision for apartments is in accordance with the 'Design Standards for New Apartments. This provision is considered appropriate by the planning authority.

12.6.17. The 17 No. car parking spaces proposed to serve the creche use is much lower than the development plan standard. It is stated that the creche is expected to solely cater for the development and thus will not generate significant car parking demand and that most employees will use sustainable modes such as on foot or by bicycle. This is considered a reasonable assumption and therefore acceptable. The planning authority consider that the level of creche car parking provided should be sufficient to cater for employee parking. However, the current form of dedicated set-down area is inappropriate in terms of location, type and size. This set-down needs to be capable of catering for parents and indeed buses dropping off and collecting children for preschool, day care and after school minding services purposes. This set-down area should consist of adequately sized parallel spaces, the quantum and location of same to be agreed with Meath county Council. The NTA report also sets out that car parking spaces in close proximity to junctions should be relocated. Should alternative locations not be available, the spaces should not be provided. This matter can be dealt with by way of condition should planning permission be forthcoming.

12.6.18. Overall, I consider the provision to be acceptable, subject to condition.

Cycle Parking

12.6.19. The Applicant has provided 368 No. cycle parking spaces (228 No. long stay and 118 No. short stay) for apartments. This is significantly below the requirement of the 'Design Standard for New Apartments'.

12.6.20. The planning authority are of the opinion that on the basis that it is proposed to provide the lower apartment car parking in line with the 'Design Standard for New Apartments' it is considered only logical that they apply the higher cycle parking standard per the same guidance. I agree that this is considered appropriate given

the argument for lower creche car parking due to the expectation that most parents and employees using and working in the creche will walk or cycle.

- 12.6.21. Furthermore, given the county and national policy which encourages and promotes sustainable travel uptake and the proximity of the train station to the proposed development site, it is considered that there is great propensity for cycle trips to and from the proposed development to the train station. As such the proposed development needs to ensure that the necessary facilities are provided to make owning and using a bike attractive, comfortable and hassle free.
- 12.6.22. I recommend that this matter can be dealt with by way of condition. The provision of cycle parking spaces in line with the national guidance document 'Design Standards for New Apartments' which will consist of 379 No. long stay and 105 No. short stay spaces should be required by condition, in the event that planning permission is forthcoming from the Board.
- 12.6.23. The Applicant has provided drawings which identifies the separate locations of the resident and visitor cycle parking. Resident cycle parking is provided within the ground floor of apartment units and visitor cycle parking is provided for the form of Sheffield Stands located externally.
- 12.6.24. The resident cycle parking meets the requirement for sheltered, secure and accessible facilities. The Applicant should provide information pertaining to the type of parking i.e. Sheffield stands, and should a racking system be required to increase the number of spaces it should be ensured that this is accessible. This matter can be dealt with by way of condition and compliance with Meath County Council.

Impact on the surrounding road network

- 12.6.25. A number of representations raise concerns regarding the impact upon the surrounding road network as a result of the development. The Traffic and Transportation Assessment Report (including construction management plan and Independent Stage 1 Road Safety Audit) provides full details of the expected number of trips to be generated and it concludes "that there are no traffic or transportation related reasons that should prevent the granting of planning permission for the proposed residential development".
- 12.6.26. The Transportation Assessment confirms that the road network and the proposed vehicular access junctions would operate within capacity during the AM

and PM 'Do Something' scenarios. The assessment also confirms that the construction and full occupation of the scheme will have a negligible and unnoticeable impact upon the operation of the adjacent road network.

12.6.27. The TA analysis submitted indicates that there is adequate capacity in the proposed access junctions to accommodate the additional demands associated with the development of the site. The Transport Department of Meath County Council have raised no concerns or objections to the proposed development, subject to condition. Having reviewed the details submitted with the application, I conclude that the development will not adversely impact the surrounding road network.

12.7. Other matters

Boundary Treatment

12.7.1. The following boundaries are proposed:

- 1800mm concrete post and timber fence separating rear gardens,
- 2m block wall finished in brick to public realm areas,
- 600mm brick wall with 1200 mm railing facing onto the Relief road as well as the proposed GAA Pitch,
- 2 m high block wall rendered to rear gardens,
- 2.4 m high metal post and rigid mesh panel fence to the existing GAA pitch and
- 1200mm high bow top railing to swale.

12.7.2. The boundary treatments between the GAA and the proposed development have been designed in detail to ensure that there is a strong connection to the GAA facilities as well as being safe and secure for both the members of the GAA club and the residents of the development. A 600mm brick wall with 1200 mm railing with landscaping facing onto the land for the proposed new GAA Pitch together with a 2.4 m high metal post and rigid mesh panel fence to the existing GAA pitch. There are 2 no. electronic gates proposed into the GAA facility for members to gain easy, safe and secure access to this facility. I consider that the proposed boundary treatment is to a relative high quality and acceptable in principle.

Community and Social Services

- 12.7.3. Third party concern has been raised with respect to insufficient childcare and school places, lack of play facilities, inadequate GP facilities, need for a community building. The planning authority consider that the proposed scheme would benefit from provision of a playground and additional play facilities to serve future residents within the scheme.
- 12.7.4. The proposed SHD includes the provision of a 586.6 sq. m creche/childcare facility to the south of the site within proposed block 3. It has been stated (Declan Brassil & Company) that the proposed facility has the potential to cater for 146 childcare places. This is in excess of the 137 required childcare places. The Social Infrastructure Audit prepared by Future Analytics and submitted with this application confirms that existing childcare facilities in Enfield, in tandem with the facility proposed as part of the development, will provide sufficient capacity for the demand generated by the development. I consider that the childcare facility and associated outdoor play space is adequate to serve the development and meet the requirements of national policy.
- 12.7.5. I note the Social Infrastructure Audit (which I consider is robust) states that there are two primary schools in Enfield and its immediate environs, St Patricks' National School and St Mary's Primary School, with two additional primary schools located within 5km. There is capacity for 74 primary pupils in the two schools in Enfield, and there is capacity for over 300 pupils at Colaiste Clavin, 8 km from Enfield. The Assessment concludes that there is sufficient capacity for primary school places provided within 10 km of the site. On 17 December 2019, the Minister for Education and Skills announced that a postprimary school to accommodate 500 students will be provided in Enfield in 2020. Policy CF POL 2 of the Enfield Written Statement indicates that the post-primary school will be provided on the G1 lands in the east of the town. These G1 lands (zoned for future education uses) are located in close proximity to the subject site, within 500m of the site along New Road.
- 12.7.6. The town has three registered childcare providers, a health centre, Garda Station, dental practice and several pharmacies. The town also accommodates several sporting and recreational facilities including Enfield Celtic Football Club, athletics and cycling clubs as well as a youth club, musical society and a Tidy Towns Committee.

Furthermore, the Na Fianna (Meath) GAA Club adjoins the subject site and will benefit from a new GAA pitch as part of the proposed development. The provision of a playground and additional play facilities to serve future residents within the scheme can be resolved by way of condition. I consider Enfield town is adequately served by social infrastructure and further the subject proposal will aid critical mass and therefore naturally impact supply and demand.

Services (Water and Wastewater Infrastructure)

- 12.7.7. Third parties have raised concern with respect to lack of adequate water and wastewater services and prematurity of the proposal pending adequate water supply being in place.

Surface Water

- 12.7.8. See Section 12.11.8 of this report for details of surface water proposals. The development as proposed broadly meets the requirements of Meath County Council Water Services Section with respect to the orderly collection, treatment and disposal of surface water, subject to condition. This is considered acceptable.

Water supply:

- 12.7.9. Section 10.1.3 of this report above sets out full details of the IW submission. It is noted that there are currently, significant water constraints in the area, however, to support development within the area, it is IWs intention to secure a land transfer and a new bore hole, currently under development as part of Planning Permission ABP-304296-18, by way of a Connection Agreement. When these lands and borehole are vested to IW, it is IWs intention to install a temporary packaged Water Treatment Plant and an additional 600m³ storage tank reservoir on these lands to service further development and growth in the area.
- 12.7.10. A water connection for this development proposal could be completed as soon as possibly practicable after delivery of the water upgrades and to be delivered under planning reference ABP-304296-18. To serve this development proposal and connect to the water infrastructure to be delivered under planning reference ABP-304296-18, a 200mm diameter watermain circa 845m extension with DMA flow meter will be required to serve the development from the new borehole on adjacent lands.

Wastewater:

- 12.7.11. In order to accommodate the proposed connection to the development, upgrade works are required to increase the capacity of the existing Enfield Wastewater Treatment Plant. Irish Water currently has a project in their current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by 2020/2021 (this may be subject to change) and the proposed connection could be completed as soon as possibly practicable after these works. Full details of the IW response is set out in section 10.1.3 of this report above.
- 12.7.12. The applicant has been advised that they are responsible for all planning consents and all other necessary approvals to 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 applicants 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.
- 12.7.13. The applicant has engaged with Irish Water in respect of the design proposal for which they have been issued a Statement of Design Acceptance for the development.

Conclusion

- 12.7.14. Both the permitted scheme and the proposed development include water infrastructural works and the proposed development also includes a raw water piper to bring untreated water from an existing borehole in the Glen Abhainn development in the west and across the site to serve the new water treatment facility. Both the permitted and proposed developments are contiguous to existing residential development and provide connections through existing schemes to the town centre. The proposed development will facilitate improved links from the permitted SHD development, existing development and the town centre. The permitted SHD development provides a relevant precedent for new residential schemes and the development of Phase II lands in lieu of Phase I lands delivering the required

quantum of housing designated for Enfield under the current development plan. I am overall satisfied with the proposed foul and surface water drainage and water supply arrangements, subject to conditions.

Flood Risk

12.7.15. A site-specific flood risk assessment has been prepared and submitted as part of this application. With reference to the OPW CFRAM flood mapping and Meath County Councils mapinfo flood mapping for the relevant area, the development site is situated in Flood Zone C i.e. the probability of flooding is less than 0.1% and therefore at low risk of flooding. A report has been received from the Senior Executive Engineer in the Environment Section indicating that the proposal is acceptable subject to condition with respect to:

(i) Details to be submitted of how the pluvial floodwaters in excess of the 1% AEP plus Climate Change will be managed on this site for the written agreement of the Planning Authority.

(ii) A surface water drainage Maintenance Plan for this proposed development be submitted for the written agreement of the Planning Authority.

12.7.16. I accept the site is not at significant risk from flooding and any risk that may arise can be managed effectively and attenuated. I accept that the proposed development is not likely to contribute to flooding risk elsewhere due to the mitigation measures proposed, which include proposals to manage flows within the site and control the rate of discharge into the collection system. I am satisfied that flood risk can be dealt with by way of standard condition and compliance with the planning authority.

Part V

12.7.17. The applicant has submitted Part V proposals as part of the application documents. 51 no. units (10% of the development) are identified in compliance with Part V of the Planning and Development Act 2000 (as amended).

12.7.18. The Proposed Site Layout Plan (Dwg. PL800 dated 20/07/20) details 12 no. 1 bedroom apartments, 11 no. 2 bedroom apartments, 3 no. 3 bedroom apartments, 19 no. 3 bedroom houses, 3 no. 3 bedroom bungalows and 3 no. 4 bedroom houses.

12.7.19. The Housing Section of the Council has confirmed that the applicant has engaged with Meath County Council in relation to compliance with Part V. A general Part V condition should be attached.

12.7.20. Albeit that concerns have been raised with respect to 26 of the 51 units Part V apartment units located within Block D I see no issue with this proposal and consider it acceptable. The remainder of the Part V units are dispersed throughout the site.

12.8. **Material Contravention**

12.8.1. The applicant has submitted a Statement of Material Contravention of the Meath County Development Plan 2013-2019 with the application. The public notices make reference to a statement being submitted indicating why permission should be granted having regard to the provisions s.37(2)(b). There is one issue raised in the applicant's Material Contravention statement, it relates to the phasing of the lands, being designated Phase II (Post 2019) in the current Meath County Development Plan 2013-2019, and the scale of the proposed development with reference to the existing housing stock in the town.

12.8.2. I have considered the issue raised in the applicant's submitted statement and advise the Board to invoke the provisions of s.37(2)(b) of the 2000 Act (as amended).

12.8.3. Enfield is allocated 319 no. new units between 2013 and 2019 under the Core Strategy of the County Plan. The Plan prioritises the development of eight sites to accommodate these units during the Plan period and designates the remaining residential lands for development in the following Plan period ('post-2019').

12.8.4. Objective CS OBJ 3 states:

"To operate an Order of Priority for the release of residential lands as follows:

- i) The lands identified with an A2 "New Residential" land use zoning objective corresponds with the requirements of Table 2A4 of this Development Plan and are available for residential development within the life of this Development Plan.
- ii) The lands identified with an A2 "New Residential" land use zoning objective but qualified as "Residential Phase II (Post 2019)" are not available for residential development prior to 2019".

12.8.5. Similarly, Strategic Policy SP 3 of the Enfield Written Statement states:

“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.

12.8.6. In addition, the Plan restricts the scale of new residential development in Small Towns with reference to the existing housing stock in the settlement.

SS Obj 14 of the Plan states;

“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”.

12.8.7. The applicant submits that residential development has not occurred on seven of the eight sites designated Phase I up to 2019. This has led to a significant under provision of housing with reference to the Core Strategy, with just 14% of the allocated dwellings provided as planned. The absence of growth in the town between 2013 and 2019 also hinders the ability of Enfield to grow into a Moderate Sustainable Growth Town (with a population of 5,000 to 15,000), being a stated objective of the current Plan. For Enfield to advance to this state as a Moderate Sustainable Growth Town its population will need to increase by 1,761 persons from the population of 3,239 recorded in the 2016 Census. Based on the average of 2.7 no. people per household, approximately 652 additional units are required to advance Enfield toward the lower end of the Moderate Sustainable Growth Town population range. It is submitted that the strict prioritisation of sites as per objective CS OBJ 3, and the restriction on the size of development as per objective SS OBJ 14, has compounded the issues of undersupply of dwellings in Enfield by preventing the release for development of other zoned lands and limiting the size of development applications.

12.8.8. It is submitted that the Board can consider granting permission for the proposed development under the provisions and requirements of section 10(3) in contravention of the phasing strategy and Settlement Strategy of the Development Plan.

12.8.9. It is submitted that the strategic importance of the lands is established by the scale and capacity of the site being in excess of 100 units that constitutes ‘strategic’ development for the purposes of the Act; the locational context of the site within Enfield; national policy including the National Planning Framework (NPF) and RSES made thereunder; the scale of homelessness in County Meath and across the

Country; and, the lack of housing delivery on Phase I lands within the lifetime of the Plan to 2019. Furthermore, there are conflicting objectives relevant to the subject site in respect of the Core Strategy and the phasing of development under the Development Plan. It is proposed to materially contravene the above provisions of the Plan (specifically to enable the timely release of these residential lands for development.

12.8.10. The core strategy and delivery of development on phase 1 lands is discussed in detail in section 12.2 of this report (Site Zoning and Principle of the Development)

12.8.11. Section 37(2)(a) of the Planning and Development Act 2000 (as amended), states that the Board may decide to grant a permission even if the proposed development contravenes materially the development plan. Section 37(2)(b) (i)-(iv) lists the circumstances when the Board may grant permission in accordance with section 37(2)(a).

- **Section 37(2)(b) (i) of the Planning and Development Act 2000, as amended: the proposed development is of strategic or national importance.** I consider the proposed development to be of strategic and national importance having regard to the definition of 'strategic housing development' pursuant to section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) and its potential to contribute to the achievement of the Government's policy to increase delivery of housing from its current under supply set out in Rebuilding Ireland – Action Plan for Housing and Homelessness issued in July 2016; and
- **Section 37(2)(b)(ii) of the Planning and Development Act 2000, as amended: there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned.** I agree that Objective SS OBJ 14 of the Development Plan and Policy SP3 of the Enfield Written Statement conflict with the overarching objectives for Enfield in the Core Strategy and Settlement Strategy of the Meath County Development Plan which seek to support the sustainable growth of the town to Moderate Growth Town status. Strategic Policy SP3 of the Enfield Written Statement prevents the release of certain zoned residential lands within the boundary of Enfield until after 2019, while SS OBJ 14 seeks to limit the number of units

sought per planning application. It is submitted that there is no supporting text or objectives in the Plan to monitor the implementation of the core or settlement strategies with the view of overriding these restrictive objectives where development is not forthcoming as planned.

- **Section 37(2)(b)(iii) of the Planning and Development Act 2000, as amended: permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government.** I consider of relevance to the subject application that both the NPF and the Action Plan for Housing and Homelessness emphasise the pressing need for new housing, with these documents referring to the provision of 25,000 no. new units per annum nationally to meet future population growth and current demand. The current proposal of 513 no. units is small in comparison to this national housing target but will contribute positively to achieving the goals of the NPF, the Action Plan for Homelessness and the RSES. In accordance with the NPF and RSES it is proposed to provide high quality housing and supporting infrastructure in a town with high capacity rail links, and within the built footprint of the settlement based on the sequential approach advocated by both policy documents. The proposed development seeks to make sustainable use of zoned lands at a residential density of 38 units per hectare. The scheme has been designed to respect the existing character of the area and to enhance pedestrian and cyclist permeability and connectivity to and across the town. The proposal incorporates a mix of housing types that meet and exceed the relevant development standards and Ministerial Guidelines and will therefore make a positive contribution to the housing stock in the region.
- **Section 37(2)(b)(iv) of the Planning and Development Act 2000, as amended: permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.** While there has been limited development in Enfield since the making of the Plan in 2013 I note that within the current Development Plan period a Strategic Housing Development

has been permitted on zoned residential 'A2' lands designated for Phase II (post 2019) development. These lands are located to the east of the subject site, on the opposite side of New Road and therefore have a similar planning and development context to the subject site, albeit that those lands are further removed from the town centre and associated amenities. The development permitted under ABP Reference 304296-18 comprises 132 units, a childcare facility and supporting service infrastructure.

12.8.12. I am satisfied that a grant of permission, is justified in this instance. Regard being had to the foregoing, I am of the opinion, that provisions set out in Section 37 (2)(b) (i) (ii) (iii) and (iv) could be relied upon in this instance.

12.9. Environmental Impact Assessment (EIA)

12.9.1. Introduction

12.9.2. The application is accompanied by an Environmental Impact Assessment Report (EIAR). The application falls within the scope of the amending 2014 EIA Directive (Directive 2014/52/EU) on the basis that the application was lodged after the last date for transposition in May 2017. The application also falls within the scope of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, as the application was lodged after these regulations come into effect on 1st September 2018.

12.9.3. The development involves a total of 513 residential units and a creche, on a site of 17.31 ha gross / 13.47 ha net. The site is located to the south east of Enfield town centre to the north of the Enfield Relief Road (R148) and to the west of New road, Johnstown, Enfield, Co. Meath.

12.9.4. Item 10(b) of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and section 172(1)(a) of the Planning and Development Act 2000 (as amended) provides that an EIA is required for infrastructure projects that involve:

- (i) construction of more than 500 dwelling units
- (iv) an area of 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere.

- 12.9.5. Given the number of units proposed and the site area in excess of 10 ha, the development requires mandatory EIA.
- 12.9.6. The EIAR is laid out in two documents, the main document including appendices and the non-technical summary. Chapter 1 is an introduction which sets out the relevant legislation and the format and structure of the EIAR as well as outlining the experts involved in preparing the document. Chapter 2 provides a description of the site, planning history and context. Chapter 3 provides a description of the proposed development. Chapter 4 provides detail with regard to the consideration of alternatives. Chapter 15 considers interactions and Chapter 16 provides a summary of mitigation measures.

The likely significant direct and indirect effects on the environment, as set out in Article 3 of the Directive, are considered in Chapters 5-15 under the following headings:

- Population and Human Health
- Biodiversity
- Land, Soils & Geology
- Water: Hydrology and Hydrogeology
- Air, Dust and Climatic Factors
- Noise and Vibration
- Material Assets: Traffic
- Material Assets: Water Supply, Drainage and Utilities
- Cultural Heritage and Archaeology
- Landscape and Visual Assessment

- 12.9.7. Article 3 (2) of the Directive requires the consideration of the effects deriving from the vulnerability of the project to risks of major accidents and / or disasters that are relevant to the project concerned. The potential for 'flooding' is considered in Chapter 8 Water: Hydrology & Hydrogeology. Having regard to the site's location within the development boundary of Enfield and some 500m of the town centre, the

nature of the receiving environment and the climatic conditions that apply, I consider that the requirements under Article 3(2) are met.

- 12.9.8. I have carried out an examination of the information presented by the applicant, including the EIAR, and the submissions made during the course of the application. A summary of the submissions made by the observers, the planning authority and prescribed bodies has been set out at Sections 8, 9 & 10 of this report. The issues raised are addressed below under the relevant headings, as appropriate, and in the reasoned conclusion and recommendation including conditions.
- 12.9.9. I am satisfied that the information contained in the EIAR has been prepared by competent experts and generally complies with article 94 of the Planning and Development Regulations 2000, as amended, and the provisions of Article 5 of the EIA Directive 2014.
- 12.9.10. A number of the environmental issues relevant to this EIA have already been addressed in the Planning Assessment at Section 12.2 – 12.8 of this report. This EIA Section of the report should therefore, where appropriate, be read in conjunction with the relevant parts of the Planning Assessment.

12.10. Consideration of Alternatives

- 12.10.1. The submitted EIAR outlines the alternatives examined at Chapter 4 (pursuant to Article 5(1)(d) of the 2014 EIAR Directive and Annex IV). The main alternatives studied comprise alternative design solutions and layouts for a largely residential development. The proposal is predicated on the zoning of the site and site-specific policy objectives in relation to plot ratio and density. Given the site's zoning and sequential approach alternative locations were not considered. A number of alternative layouts for the proposed development were considered over the design process. In addition, the proposals for the development were subject to pre-planning consultation with the Planning Authority and An Bord Pleanála prior to the principles of the proposed layout being finalised. Specifically, the proposed layout and detailed design has been directly informed by An Bord Pleanála's Opinion issued subsequent to pre-planning consultation.
- 12.10.2. The significant environmental issues and potential effects which informed the proposed layout included the established pattern of development in the area; the

need to create a strong urban frontage addressing its strategic location at the boundary of Enfield town and fronting the Enfield Relief Road, the need to ensure maximum accessibility and permeability throughout the site and access to neighbouring residential areas ensuring strong connections to the town centre and future development lands which will have positive impacts on population and human health; inclusion of green spaces and pocket parks strategically located to ensure maximum passive surveillance and usability, with tertiary pedestrian routes through the development orientated to optimise the possibility of attractive routes, connecting the development with the town.

- 12.10.3. Alternative processes are not relevant to the proposal. In my opinion reasonable alternatives have been explored and the information contained in the EIAR with regard to alternatives is comprehensive, provides a justification in environmental terms for the chosen scheme and is in accordance with the requirements of the 2014 EIA Directive.

12.11. Assessment of Effects

12.11.1. Population and Human Health

Chapter 5 of the EIAR addresses population and human health. The potential effects are considered in the context of population, community facilities and amenities, economic activity and employment.

The area immediately surrounding the site is characterised by residential dwellings located north of the subject site in the developed neighbourhoods of Glen Abhainn and Newcastle Woods, with low density one and two-storey housing located east of the subject site along New Road. Other lands in the vicinity are primarily agricultural in nature.

The construction of 513 new dwellings will provide critical housing infrastructure for Enfield and Meath County as a whole. The additional population for Enfield will contribute positively to the community by reinforcing and strengthening the services and function of the town and by increasing housing supply to assist in meeting the pent up demand experienced by a lack of development in the town since 2013.

During the construction phase there will be positive economic impacts as a result of employment and economic activity generated by the development. Impacts on

health and safety could arise due to increased traffic and the nature of construction activities, however, the risk to population can be mitigated through adherence to health and safety legislation and best practice construction management. Impacts on health and wellbeing arising from effects on air and climate, noise and vibration, landscape and visual, traffic and water during the construction and operational phases are considered and discussed under the respective headings of the EIAR. I am satisfied that the impacts on population and human health during the construction phase will be slight and short-term in nature and that impacts will be mitigated to an acceptable level by the measures detailed in the relevant sections of the EIAR. In terms of cumulative impacts during construction, I am satisfied that the risks can be avoided, managed and mitigated through good construction management practices and that cumulative impacts are not likely to arise.

During the operational phase, the development will provide housing and a creche close to the town centre of Enfield with the potential for significant positive impacts on population and human health. The design and layout of the proposed development is in accordance with relevant national and local policies and will provide a satisfactory standard of residential accommodation, while the planning assessment above concludes that significant adverse impacts on visual or residential amenities would not arise. I consider that the impact of the scheme will be largely positive and that any potential adverse impacts will be mitigated to an acceptable level by the design and management measures proposed within the scheme. The potential for cumulative impacts during the operational phase is largely positive in my view as the developments is consistent with the zoning and statutory Development Plan for the area.

I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of population and human health. I am also satisfied that cumulative effects are not likely to arise.

12.11.2. Biodiversity

Chapter 6 of the EIAR describes the potential impacts on biodiversity. A review of the biodiversity of the site was carried out by Scott Cawley Ltd. and this included a study of existing information from the area and a site survey. Field surveys were carried out in May and June 2019 and again in 2020. A habitat survey of the northern lands was carried out on the 2nd and 3rd May 2019, and a habitat survey of the south-eastern lands was carried out on the 10th June 2020. A general fauna survey was carried out by Scott Cawley Ltd. concurrently with the habitat surveys on 2nd and 3rd May 2019 and the 10th June 2020. Specialist bat surveys were undertaken by Scott Cawley Ltd. in May 2019 and June 2020. Three bat activity surveys were undertaken within the subject lands, with the aim of identifying bat activity and presence/absence of roosting bats. One dusk activity survey and one dawn activity survey were undertaken in the northern lands on 2nd and 17th May 2019 respectively. Dedicated breeding bird surveys were undertaken by Scott Cawley in the northern lands on 2nd and 17th May 2019. The two breeding bird surveys were undertaken with the aim of identifying the presence/ absence of breeding birds onsite.

Based on the habitat surveys, the dominant habitats within the proposed development site include improved agricultural grassland, tilled land, hedgerows, treelines and scrub.

The site is not within or adjacent to any area that is designated for nature conservation at a national or international level. There are no plants recorded from the site that are listed as rare or of conservation value. There are no habitats that are examples of those listed on Annex I of the Habitats Directive. There are no alien invasive plant species as listed on Schedule 3 of SI No. 477 of 2011.

The nearest designated sites, the River Boyne and River Blackwater SAC and the River Boyne and River Blackwater SPA, lie c.9.6m to the north-west of the proposed development (c.17km downstream). A potential source-pathway-receptor link has not been ruled out to the River Boyne and River Blackwater SAC [002299] and to the River Boyne and River Blackwater SPA [004232]. An NIA was submitted this is dealt with in detail under the subsequent AA section 12.14 of this report.

Due to the presence of three confirmed bat species using the proposed development site and the suitability of habitats within the proposed development site for foraging and commuting bats, and potentially for roosting bats, the local bat population

utilising the proposed development site has been valued as local (high) ecological importance.

No evidence of otter, was recorded within the boundary of the subject lands during the site surveys and there are no features present within the subject lands that would provide suitable habitat for otter. No badger setts, feeding signs or territorial markings of badger (i.e. latrines) were observed within the subject lands during the site surveys. However, a badger was sighted within the perimeter of the eastern lands surveyed on 10th June 2020. Notwithstanding the absence of signs of badger setts, the subject lands are considered likely to be part of the wider territory of local badger populations. Considering the protection offered to badgers and their setts, the local badger population is valued as being of local importance (higher value). Some smaller mammal species of conservation concern, such as hedgehog and pygmy shrew, may potentially use habitats within the proposed development site such as hedgerows. As such, the local small mammal populations (excluding bats) are assessed as being of a local (higher) ecological importance.

Sixteen bird species were noted during the dedicated breeding bird surveys of the northern lands: ten of which are BoCCI Green-listed birds. Due to the activity recorded and the suitability of habitats within the subject lands for breeding birds, the value of the local breeding bird population has been valued as local (high) ecological importance.

Tilled land within the northern lands is likely to be of importance for common overwintering farmland bird species which were recorded during the breeding bird survey such as blackbird, great tit and robin. However, as the only species likely to use the subject lands in winter are common overwintering farmland birds and given abundance of similar agricultural habitat in the surrounding area, the local wintering bird population are valued as local (low) ecological importance.

No evidence of any amphibians was recorded within the subject lands during the site surveys. There are no watercourses or wetland features within the proposed development site, and, therefore, no suitable habitat for amphibians. As such the site is not valued as having ecological importance for amphibians.

Table 6.3 of the EIAR sets out Ecological Evaluation of Key Ecological Receptors. It is noted that the River Boyne and River Blackwater SAC and River Boyne and River Blackwater SPA, Foraging/Commuting/ Roosting Bats, Badger, Small Mammals and Breeding Birds are identified as Key Ecological Receptors.

5 no. trees and 415m of hedgerow will be retained and protected during the construction period, with the removal of 15 no. trees and 925m of hedgerow. However, it is proposed to plant over 500 new trees and 1690m of hedgerow, as well as creating new planted and seeded areas. The proposed landscape planting, will reduce the long-term effect of habitat loss arising from the proposed development and the inclusion of semi- mature trees will likely reduce habitat loss impacts to medium-term.

Section 6.7.7 of the EIAR sets out Mitigation Measures proposed for construction phase and operational phase for 'Designated Areas for Nature Conservation', 'habitats', 'bats' and 'breeding birds'. These include and not exclusively:

- No storage of hydrocarbons or any polluting chemicals will occur within 50m of the Ballycarron River or the River Blackwater [Longwood] and refuelling of plant will not occur within 50m of the Ballycarron River or the River Blackwater [Longwood]. Any fuels or chemicals on site will be stored within double sealed tanks with bunds to prevent any seepage of same into groundwater.
- Dedicated fuel filling points will be set-up with all plant to be brought to these points for filling. All fuels and chemicals required to be stored onsite will be clearly marked.
- All mobile fuel bowsers will carry a spill kit and all relevant personnel will be familiar with the use of this equipment. All fuel containing equipment such as portable generators will be placed on drip trays. All fuels and chemicals required to be stored on-site will be clearly marked. Care and attention will be taken during refuelling and maintenance operations. Particular attention will be paid to gradient and ground conditions, which could increase risk of discharge to waters.
- A register of all hazardous substances, which will either be used on site or expected to be present (in the form of soil and/or groundwater contamination) will be established and maintained. This register will be available at all times and will include as a minimum:
 - Valid Safety Data Sheets;
 - Health & Safety, Environmental controls to be implemented when storing, handling, using and in the event of spillage of materials;
 - Emergency response procedures/precautions for each material; and,

- The Personal Protective Equipment (PPE) required when using the material.
- A buffer zone of at least 5m will be maintained between construction works and retained hedgerows to ensure that the root protection areas are not damaged.
- Prior to felling, trees with suitability to support roosting bats will be examined at height for the presence of bats and features which could support roosting bats. If bats are encountered, then they will be removed by hand by a bat specialist under licence from NPWS and placed in a bat box for release at dusk.
- Any trees to be felled on site which cannot be fully examined at height will be rigged and felled in a way that is sensitive to the potential presence of bats. Trees will be section-felled, and the felled parts left in situ on the ground for a period of 24 hours. This should allow any bats present to escape or bats extracted by a bat worker licenced to handle bats and placed in bat boxes to be erected on site. In addition, any trees which are to have works on their limbs carried out will be checked for the presence of bats by a bat specialist prior to any works commencing.
- Lighting proposals for the construction phase will adhere to the advice provided in Bats and Lighting – Guidance for Planners, Engineers, Architects and Developers (Bat Conservation Ireland 2010), Bats and artificial lighting in the UK Bats and the Built Environment series Guidance Note 08/18 (Institution of Lighting Professionals & Bat Conservation Trust, 2018) and Guidance Notes for the Reduction of Obtrusive Light GN01 (Institute of Lighting Professionals, 2011). Construction stage lighting details will be reviewed by a qualified bat ecologist. If necessary, the bat ecologist will recommend adjustments to directional lighting (e.g. through cowls, shields or louvres) to minimise light spill from the proposed development to the surrounding areas.
- Where feasible, vegetation (e.g. hedgerows, trees, scrub and grassland) will not be removed, between the 1st March and the 31st August, to avoid direct impacts on nesting birds. Where the construction programme does not allow this seasonal restriction to be observed, then these areas will be inspected by

a suitably qualified ecologist for the presence of breeding birds prior to clearance. Areas found not to contain nests will be cleared within 3 days of the nest survey, otherwise repeat surveys will be required.

- Run-off of clean roof water will be directed to the stone reservoir below the block paving in driveways which allows the run-off to infiltrate to the sub-soil and provide attenuation, storage and soakage for run-off. This provides attenuation at source and facilitates a reduction in the volume of runoff generated by the development. The mobilisation of the storage layer within each property affords an additional opportunity for groundwater recharge to occur, particularly in times of heavy rainfall, and would contribute to a reduction in the overall volume of surface water runoff. The surface water drainage network within the proposed development has been designed to take account of 75% of the total area of all house roofs. All driveways, paths and roads are designed to take account of 100% run-off to the surface water drainage network. Given the conducive subsoil conditions this would be considered a conservative approach and ultimately lead to an effective and high-performance drainage system.
- It is proposed to provide 'Downstream Defenders' downstream of the proposed flow control 'Hydro-Brake' manhole. These will provide a level of treatment before discharge to the main surface water system. Footpaths will run-off to open space areas, where allowable, to reduce run-off to impermeable areas and provide infiltration.
- Stormtech Attenuation System: The attenuation system will provide the majority of the overall attenuation storage for the whole site. These systems are also low maintenance. In compliance terms, the 100-year flood event (plus 20% climate change) is retained on the development site.
- As per the conditions outlined by Irish Water, a temporary foul water pump station and wastewater treatment plant will be constructed on site until the proposed upgrade to Enfield WWTP is completed and commissioned. Polishing units and settlement tanks will be provided to achieve effluent quality of BOD 20mg/l and TSS of 30mg/l prior to discharge to public sewer as agreed with Irish Water.

- Prior to the construction of the on-site treatment facilities, foul water on site will be managed via Portaloo's which will be appropriately treated off site.

I note that the EIAR and the AA screening concludes that the proposed development has the potential to negatively affect water quality in the receiving surface water and groundwater environment during construction and operation. Therefore, there is the potential for the conservation objectives of the River Boyne and River Blackwater SAC and the River Boyne and River Blackwater SPA to be negatively affected. It is my opinion, however, that the mitigation measures described in the NIS prepared for this application which are also outlined Section 6.7.1 of the EIAR, are standard construction practices and are not proposed or intended to mitigate a potential effect on the SAC/SPA. Reference to them merely indicates that a competently designed and constructed residential development on this site would not be likely to have a significant effect on the adjacent SAC / SPA during its operation.

With the standard procedures of good practice in place, the ecological impacts by this proposed development will be neutral or, at worst, minor negative. There are no impacts that could affect any area designated for nature conservation. The impact of the proposed development on European sites is addressed in the AA Screening Report and Section 12.14 of this report. The site does not overlap or adjoin any European or nationally designated sites and the closest sites considered to fall within the zone of influence of this project are the River Boyne and River Blackwater SAC and the River Boyne and River Blackwater SPA located c.9.6m to the north-west of the proposed development (c.17km downstream). However, having regard to the nature and scale of the development and the level of separation, it is concluded that the proposed development is not likely to have significant effects on any European site, whether considered alone or in combination with other projects.

I have considered all of the written submissions made in relation to biodiversity. I am satisfied that the identified impacts would be avoided and managed through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of biodiversity. I am also satisfied that cumulative effects are not likely to arise.

12.11.3. Land, Soils and Geology

Chapter 7 of the EIAR describes the potential impacts on land and soils. The development involves the construction of 513 residential units and a creche building. Likely significant impacts on land and soil are not envisaged. During the construction phase the main risks to underlying subsurface strata are from the stripping of topsoil, excavation of subsoil layers and accidental leaks or spillages of contaminating substances. During the operational phase risks are again related to accidental leaks or spillages from contaminants. Also covering of the site with permanent impermeable surfaces (soil sealing) is identified as having the effect of sterilising any potential subsurface resources.

In terms of mitigation, materials and substances that could contaminate land and soil will be handled and stored in a manner that will prevent or minimise potential impacts as detailed in Section 7.5 of the EIAR. This will include the use of bunded storage areas, designated areas for vehicle refuelling, wet concrete management and the use of oil interceptors.

Potential cumulative impacts on land and soil are not anticipated or predicted. I am satisfied that the risks outlined above can be similarly avoided, managed and mitigated through good construction management practices and that cumulative impacts are not likely to arise.

I have considered all of the written submissions made in relation to land and soil and the relevant contents of the file including the EIAR. I am satisfied that impacts identified on land and soil would be avoided, managed and/or mitigated by measures that form part of the proposed scheme, by the proposed standard mitigation measures and with suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of land and soil. I am also satisfied that cumulative effects are not likely to arise.

12.11.4. Water: Hydrology and Hydrogeology

Chapter 8 of the EIAR deals with water. In relation to the receiving environment, the EIAR notes that the nearest surface water bodies to the site are the River Blackwater c. 700m to the south at its closest point and the Ballycorrion River c. 1km to the east at its closest point. There are no other surface water bodies in the area, apart from local drainage ditches. There is an existing dry ditch running along the northwest and

western site boundary which drains to a 900mm box culvert at the Relief Road (R148). No surface water from the Relief Road along the southern site boundary drains onto the site. A small spring is noted c. 240m to the south of the proposed development site boundary, draining via a drainage ditch to the Ballycorron River. The site lies in the Blackwater (Longwood) Sub-Catchment of the Boyne Catchment. Regional groundwater flow is likely to follow the topographic gradient across the town of Enfield towards the southeast and south, discharging to the River Blackwater. Groundwater flow in the vicinity of the site is likely to be under the influence of pumping from the Enfield PWS, with groundwater being drawn across the site towards the abstraction well at the north-western site boundary. Groundwater quality in the bedrock aquifer is good and the current status of the regional aquifer (groundwater body) under the Water Framework Directive monitoring programme is 'Good'.

- The proposed surface water drainage system will collect storm water runoff from the proposed development via a traditional pipe-work and manhole system laid within the main access roads. SuDs features will be incorporated to reduce runoff volumes and improve runoff water quality. Underground stormwater attenuation storage areas will be sealed to prevent infiltration from or exfiltration to shallow groundwater;
- The foul drainage strategy for the development will be to discharge as much foul drainage as possible to the existing foul sewer on Johnstown Road to the west of the site which ultimately discharges to the Enfield wastewater treatment plant (WWTP) located next to the River Blackwater, near Johnstown Bridge, to the south. Foul drainage from the remainder of the site will be pumped to a new gravity sewer in the site which will outfall to the existing foul sewer on Johnstown Road. Upgrade works are required to increase the capacity of the existing Enfield WWTP; the first phase of the proposed development will discharge to a temporary on-site underground wastewater treatment plant prior to entering a foul pumping station until such time as the upgrade works to the Enfield WWTP are completed;
- Water supply for the proposed development will be taken from a new Irish Water supply installation to the east of the site (2 No. new production wells). This new installation is to be delivered by an adjacent landowner in

conjunction with Irish Water. A new raw watermain from the existing borehole in the Glen Abhainn residential estate will be laid through the site to the new water treatment works and a new watermain will be laid to serve the site.

A Site Specific Flood Risk Assessment has been undertaken which concludes that the proposed residential development is appropriate for the site's flood zone category (Flood Zone C). Stormwater discharge in the final development will be restricted to greenfield rates and pass through an oil-water separator before discharge off-site. There is little or no surface water runoff from the existing site therefore there will be a net increase in stormwater, limited to greenfield rates, diverted to the public drainage system and ultimately to the River Blackwater. The proposed development site is at low risk of flooding.

The River Boyne, where the River Blackwater joins it c. 15km downstream from Enfield, is part of the River Boyne and River Blackwater SAC and SPA. Given the distance downstream and the low potential for pollution from drainage from the proposed development, impact on the SAC/SPA is not likely in the construction and operational phases, however, it is submitted by the First Party that during the construction phase there is potential for contaminants to enter ground and surface water systems and impact on the natural water environment. Mitigation measures are proposed in Chapter 6 and Natura Impact Statement (included at Appendix 6.A) on a precautionary basis. Best practice measures will be implemented during the construction phase to avoid / mitigate potential impacts. There are no potential impacts on other hydrological features designated as areas for conservation within 10km of the site. Again I note for the attention of the Board that it is my opinion that the mitigation measures proposed are standard construction practices and are not proposed or intended to mitigate a potential effect on the SPA/SAC.

Standard mitigation measures and best practice measures will be incorporated into the Construction Environmental Management Plan and Waste Management Plan documents that will be prepared prior to construction. Implementation of the measures outlined in the CMP will ensure that the potential impacts of the proposed development on surface water and the hydrogeological environment do not occur during the construction phase.

Irish Water indicate that connections to foul and water networks are feasible, subject to upgrades. In terms of cumulative impacts on water, I am not aware of any similar

developments permitted or under construction on sites in the vicinity that would carry similar risks. I am satisfied that the risks outlined above can be similarly avoided, managed and mitigated through good design / construction management practices and that cumulative impacts are not likely to arise.

I am satisfied that the identified impacts would be avoided and managed by way of standard construction measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of water. I am also satisfied that cumulative effects are not likely to arise.

12.11.5. Air, Dust and Climatic Factors

Chapter 9 deals with Air, Dust and Climate. The proposed construction works associated with the development proposed in this planning application is expected to take approximately 5 years. The potential air quality impacts during construction are summarised as follows:

- (a) Dust emissions associated with excavations and demolition works
- (b) Construction transport emissions
- (c) Aspergillus emissions from excavation and earthmoving activity

This assessment shows that the most significant potential impacts are those associated with construction activity and construction traffic. There is predicted to be a temporary slight adverse impact on the closest receptors during the Construction Programme. There will be no lasting impact and the short-term impact can be managed by means of an effective Construction Management Plan incorporating the mitigation measures outlined in the EIS.

These impacts can be mitigated through good construction practices, as set out in Section 9.6 of the EIAR, and would be short-term and negligible in my view. In terms of climate there is potential for greenhouse gas emissions associated with the use of construction vehicles, generators etc, but given the scale of the development it is considered that impacts would be negligible and short-term during construction. The primary source of air and climatic emissions during the operational phase would be from traffic related emissions. The largest change in traffic volume at the key junctions for the opening year was +45 (6% increase) for the With Development scenario and the largest change in traffic volume for the design year was +251 (29% increase). The potential impact on air quality associated with a traffic volume change

of this magnitude is considered not significant in a local context and imperceptible in an overall context particularly considering the advanced developments made in cleaner and more efficient vehicle engines. It is considered that the impacts would be long-term but imperceptible.

Given the nature and scale of the development proposed, I am satisfied that no significant impacts arise in respect of air and climate during construction and occupation phases.

12.11.6. Noise and Vibration

Chapter 10 of the EIAR addresses Noise and Vibration impacts. The construction works associated with the development proposal are very limited due to the nature of the existing site and the nature of the proposal. Site clearance works are limited, there is no demolition work required,

During the construction phase of the proposed development there will be some noise impacts experienced at the nearest receptors to the subject site. Mitigation measures proposed will ensure that noise and vibration impacts are kept to a minimum. The predicted noise and vibration impacts on the receiving environment during the construction phase are considered to be moderate and temporary and only affecting a small number of properties over a short time-period. The potential for noise generation during the operational phase of the proposed development is limited to additional vehicles on the surrounding road network. The change in vehicle numbers predicted is not significant in an overall context. The predicted noise and vibration impacts on the receiving environment during the operational phase are considered to be not significant and long-term.

The EIAR indicates that noise control measures will be applied during the construction phase (inc. limited and hours of operation) to ensure that noise and vibration impact is kept to a minimum. During the operational phase, no significant sources of noise or vibration are anticipated. Section 10.7 of the EIAR sets out mitigation measures to reduce the noise emissions from plant and I am satisfied that any risks can be addressed by way of condition. No cumulative impacts are anticipated.

I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation

measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of noise or vibration. I am also satisfied that cumulative effects are not likely to arise.

12.11.7. Material Assets - Traffic

A Traffic Impact Assessment (TIA) has been undertaken with the objective of both quantifying the existing and transport environment and detail the results of assessment work undertaken to identify the potential level of transport impact generated as a result of the proposed residential development. The scope of the TIA covered transport and sustainability issues including access, pedestrian, cyclist and public transport connections. Recommendations contained within the TIA are based on existing and proposed road layout plans, site audits, on site traffic observations and analysis of junctions.

The subject site is zoned residential, positioned within 500m of Enfield town centre, it is ideally located to maximise access to / from the site by sustainable forms of travel including walking, cycling and public transport (Bus Éireann and private service providers).

The proposed development is located approximately 1.6km southeast of the Enfield Rail Station. The station provides commuter services eastwards to Dublin Connolly Station and northwest to Mullingar, Longford and Sligo.

In order to reduce the number of private vehicles to and from the development, a number of walking and cycling connection points are proposed to encourage more active travel; the majority of these are situated along the R148 Regional Road. An access is also proposed for pedestrians and cyclists only to New Road at the eastern side of the development. Potential links are also proposed at the northern and western side of the development and will aim to link into existing and proposed lands on these sides. It is also proposed to upgrade the footpaths and cycle facilities along the R148, in the vicinity of the site. These upgraded facilities and convenient access points will provide safe and attractive routes for residents and will encourage the use of more sustainable modes of travel. A large number of cycle parking spaces are proposed for both residents and visitors to the development to encourage reduction in private car use. A total of 368 cycle parking spaces are proposed within the development.

During the construction phase traffic volumes accessing the site will be small compared to the volumes during the operational phase and no significant impacts are envisaged.

The analysis undertaken in the TIA represents a worst-case appraisal of a typical weekday as it is focused upon the two busiest periods of the day (i.e. AM and PM peak hours). During the remaining 22 hours of the day, traffic flows are predicted to be significantly lower resulting in the network operating with additional reserve capacity to that forecast for the peak hour periods. Similarly, over the weekend periods both the site generated traffic and the external road network traffic flows are generally lower compared to the weekday peak hour periods that have been assessed. In conclusion, it is considered that the impact on the surrounding road network, as a result of the proposed development will be minimal. This is based on the anticipated levels of traffic generated by the proposed development, the existing and future road infrastructure and the information and analysis summarised in Chapter 11 of the EIAR

The analysis detailed within the TIA demonstrated that the four junctions surveyed will operate within capacity during the AM and PM 'Do Something' scenarios for a 2037 design year. The increase in vehicular traffic will provide a neutral, moderate and permanent impact on the surrounding road network.

I consider that the development will have a limited impact on the established traffic conditions at this edge of centre / suburban location. I am satisfied that any negative impacts arising from increased traffic movements would be offset by the provision of good quality cycle and pedestrian facilities within the development and along the R148 and the site's proximity to Enfield town centre.

I have considered all of the written submissions made in relation to roads, traffic and transportation. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of roads, traffic and transportation. I am also satisfied that cumulative effects are not likely to arise.

12.11.8. Material Assets – Water Supply, Drainage & Utilities

Surface Water Drainage.

Proposed surface water sewers have been designed in accordance with the Greater Dublin Strategic Drainage Study (GDSDS) and BS EN 752: 2008 Drain and Sewer Systems Outside Buildings. Surface water calculations are based on an allowable outflow / greenfield runoff rate of 28.6 l/sec resulting in a total attenuation volume of 2,335 m³, as determined in Chapter 8.0 (Water: Hydrogeology & Hydrology). Surface water runoff from the site's road network will be directed to the proposed pipe network via conventional road gullies and swales while surface water runoff from driveways will be captured by permeable paving. Surface water runoff from roofs will be routed to the proposed surface water pipe network via the porous aggregates beneath permeable paved driveways (providing an additional element of attenuation and treatment).

Foul Drainage.

Irish Water, in their Confirmation of Feasibility Letter (CoF) dated 03rd October 2019 (see Appendix 3.C), confirmed that upgrade works are required to increase the capacity of the existing Enfield WWTP and that these upgrade works are scheduled to be completed by 2020/2021. Prior to this, Irish Water have stated in their CoF letter that domestic treated effluent meeting discharge limits of Biological Oxygen Demand (BOD) 20mg/l and Total Suspended Solids (TSS) 30mg/l will be accepted into the Irish Water Network. To allow for commencement of development on site, the first phase of the proposed development will discharge to a temporary on-site underground wastewater treatment plant prior to entering the foul pump station (FPS) until such a time that upgrade works to the Enfield WWTP are complete (2020/2021). It is envisaged that a maximum of 100 no. units would be constructed prior to completion of the Enfield WWTP upgrade works. The wastewater being treated on site will meet the above criteria set out by Irish Water prior to entering the FPS and discharging to the existing foul sewer network and, ultimately, the Enfield WWTP. This temporary plant will be decommissioned upon completion of the upgrade works at Enfield WWTP.

Water Supply.

Water supply for the development will be taken from a new Irish Water supply installation to the east of the site. This new installation is to be delivered by an adjacent landowner in conjunction with Irish Water. As per the confirmation of feasibility, a new 200mm watermain will be laid across the subject site to bring raw water from borehole at Glen Abhainn to the new Irish Water WTP.

Utilities.

A site-specific Construction & Environmental Management Plan (CEMP) will be developed and implemented during the construction phase. Implementation of the measures outlined in this plan will ensure that the potential impacts of the proposed development on the site's material assets do not occur during the construction phase.

Relocation of existing overhead ESB lines will be fully coordinated with ESB Networks to ensure interruption to the existing power network is minimised. All utilities ducting and diversion will be carried out as per the supplier instructions, therefore no predicted residual impacts are expected from the operational phase. Connections to the existing ESB, gas and telecommunications networks will be coordinated with the relevant utility provider and carried out by approved contractors.

I have considered all of the written submissions made in relation to material assets. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of material assets. I am also satisfied that cumulative effects are not likely to arise.

12.11.9. Archaeology, Architectural and Cultural Heritage

Archaeology, architectural and cultural heritage is addressed in Chapter 13 of the EIAR. No features of archaeological or cultural heritage interest were identified within the subject site or in its immediate environs.

It is considered that the development of the subject lands will not cause any impacts (direct, indirect/visual) to any monuments, structures or features of archaeological or

architectural heritage interest or potential; likewise there are no significant historical events associated with the lands. Consequently, in terms of overall Cultural Heritage, it is considered that no Residual Impacts will occur as a result of the construction and subsequent operation of the proposed development. It is not considered necessary to offer any mitigation measures in terms of Local History, Archaeological Heritage or Architectural Heritage for construction or operational phases. It is also not considered necessary that any monitoring is required at construction or postconstruction/operational phases of the proposed development.

However, the site is a large area on the edge of Enfield and has the potential to contain previously unknown archaeology. Given the comments of the DAU Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media, see section 10.1.4 of this report I recommend that topsoil stripping is monitored by a suitably qualified archaeologist during the construction phase of the development.

I am satisfied that no potential impacts arise. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect or cumulative impacts in terms of archaeology, architectural and cultural heritage.

12.11.10. Landscape and Visual Assessment

Chapter 14 of the EIAR describes the landscape and visual effects of the proposed development. The site is located in Co. Meath on the southern edge of Enfield town and within 500m of the town centre. Na Fianna GAA club is located on lands immediately northeast of the site. The Enfield Relief Road, R148 bounds the site to the south and residential and agricultural lands bound the site to the north and west. The site is approximately 17.31 ha in size. There are no Natura 2000 sites located in the town. The Royal Canal, NHA runs north of the town, approximately 790m north of the site. The subject site is irregular in shape. The main area of the site comprises two large open fields and two smaller fields. The site includes sections of the Enfield Relief Road. The smaller field portions located in the south of the site appear to arise where larger fields were severed by the road works as a result from the construction of the R148 Relief Road as it passed through the landscape. A portion of the Relief Road was then planted with native mixed hedgerow. The northern boundary abuts

urban residential estates, namely, Glen Abhainn and Newcastle Woods and single one – off residential dwellings about the eastern / north eastern boundary.

The Meath County Development Plan 2013-2029 does not identify any views to be protected in the immediate vicinity of the site.

The topography within the site slopes gently on a general north south axis. The highest point of the site lies along the northern boundary at approximately +78.00 OD. The level at the midpoint of the southern boundary of the site is approximately +75.00 OD. An embankment occurs along the southern boundary with the Enfield Relief Road R148 which rises from grade at the eastern edge to approximately 1.9m at the western edge of the southern boundary. Ground conditions vary and the lands are free draining.

A total of twenty trees were identified on the site, occurring within hedgerows and tree lines. Many of the hedgerows comprise remnant agricultural hedgerows which are now somewhat fragmented but contain some original elements.

A detailed Tree Survey and Arboricultural Assessment has been carried out by John Morgan of Independent Tree Surveys and is included in Appendix 14.B of the EIAR. Generally, open unrestricted views occur along the Enfield Relief Road, R148 from the southeast, south and southwest. Otherwise views into the site are restricted by residential development to the east and north and intervening topography and vegetation elsewhere.

The Proposed Development integrates a portion of the existing trees, five in total, and hedgerows on site within the proposed landscape plans by Landmark Designs Ltd., included in Appendix 14.C. These are primarily located to the western, northern and eastern boundaries. Some existing hedgerows and tree lines (incorporating individual trees) will need to be removed to facilitate the development. These are primarily located to the southwestern, southern and eastern boundaries of the site. The proposal requires the removal of fifteen trees, one tree line and two hedgerows. The partial removal of Tree Group G2 and three hedgerows is also required. Of the fifteen proposed trees to be removed, eight are of moderate quality and value (B Category); six are of low quality and value (C Category) and one is of poor quality (Category U). The tree line to be removed is of low quality and value (C Category). The two hedgerows to be removed are of low quality and value (C Category). The partial removal of Tree Group G2 and three hedgerows are of low quality and value (C

Category). Due to the removal of existing vegetation, the overall impact on existing trees is deemed to be negative, moderate and permanent.

It is proposed to provide substantial new tree planting, circa 580 number, throughout the site to create streetscapes, avenues, screening, cluster and groups and within new hedgerows. It is also proposed to provide a quality linear green route streetscape of semi-mature native tree planting along the Relief road incorporating pedestrian and cycle amenities along the road.

The proposed development would change the character of the site from rural fringe to urban. Eleven views were chosen to illustrate the visual impact of the Proposed Development. Each view is illustrated as existing only and the impact of the development on the view is assessed. I note the Architects Design Report and the Landscape Masterplan submitted with the planning application which include photomontages of the proposed development from key locations. The development will be viewed as part of a composition of a one storey, two storey and 4 part three / four storey Apartment Blocks.

Negative visual effects are likely to arise during the construction phase due to construction activities, but these will be localised and short-term in nature. In the medium to long term impacts would be positive, moderate, in my view, as the development is within the development boundary of the town of Enfield and a natural extension to the phased development of the town. The submitted drawings detail the contiguous elevations and I consider the potential cumulative impacts to be moderate.

I have considered all of the written submissions made in relation to Landscape and Visual Impact. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of Landscape and Visual Impact. I am also satisfied that any cumulative effects arising would be positive.

12.12. Interactions between Environmental Factors

- 12.12.1. Section 15 of the EIAR deals with the interactions between environmental factors. A specific section on interactions is included in each of the environmental

topic chapters of the EIAR. The primary interactions are summarised in the EIAR as follows:

- Population and human health
- Biodiversity
- Land, Soil and Geology
- Water, Hydrology and Hydrogeology,
- Air, Dust and Climatic Factors
- Noise and Vibration
- Material Assets - Traffic
- Material Assets - Water Supply, Drainage and Utilities
- Cultural Heritage and Archaeology
- Landscape and visual impact Assessment

The various interactions have been described in the EIAR and have been considered in the course of this EIA.

Mitigation measures are proposed and outlined within individual EIAR chapters to ensure that any potential adverse impacts that may arise as a result of the proposed development are minimised.

12.13. Reasoned Conclusion on the Significant Effects

12.13.1. Having regard to the examination of environmental information set out above, to the EIAR and other information provided by the developer, and to the submissions from the planning authority, prescribed bodies and observers in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:

- Significant direct positive effects with regard to population due to the increase in the housing stock.
- Potential direct effect on the landscape by the change in the use and appearance of a relatively large site from greenfield suburban to residential. Landscape and visual impacts, will be mitigated by the retention and enhancement of existing trees and hedgerows and new landscaping throughout the site. Given the location of the site within the development boundary of Enfield and 500m from

the town the landscape and visual impact is considered moderate positive effect and acceptable.

- The most notable interaction occurs between Population and Human Health and Traffic and Transportation during the construction phase due to construction works contributing to an increase in noise and traffic volumes as well as a reduction in air quality. These impacts will only be short-term, and their impact will be minimised through the implementation of mitigation measures specified in Chapter 11.
- Moderate negative interaction is assumed during the construction phase between biodiversity and landscape and visual amenity. This interaction will also be short term, limited to the duration of the construction period.
- Biodiversity impacts. See section 12.11.2 of this report and section 6.7.7 of the EIA. Mitigation measures include, but not exclusively:
 - A buffer zone of at least 5m will be maintained between construction works and retained hedgerows to ensure that the root protection areas are not damaged.
 - Prior to felling, trees with suitability to support roosting bats will be examined at height for the presence of bats and features which could support roosting bats. If bats are encountered, then they will be removed by hand by a bat specialist under licence from NPWS and placed in a bat box for release at dusk.
 - Potential direct effects with regard to loss of Habitat and Green Infrastructure. To offset the loss of hedgerow and treelines it is proposed to create new, biodiversity planting within areas of public open space. This planting will effectively create a new biodiversity corridor which will provide connectivity for the species which are currently recorded in this location. While this woodland will take time to mature it will ultimately compensate for the loss of hedgerows and green infrastructure arising from the development.
 - Any trees to be felled on site which cannot be fully examined at height will be rigged and felled in a way that is sensitive to the potential presence of bats. Trees will be section-felled, and the felled parts left in situ on the ground for a period of 24 hours. This should allow any bats present to

escape or bats extracted by a bat worker licenced to handle bats and placed in bat boxes to be erected on site. In addition, any trees which are to have works on their limbs carried out will be checked for the presence of bats by a bat specialist prior to any works commencing.

- Lighting proposals for the construction phase will adhere to the advice provided in Bats and Lighting – Guidance for Planners, Engineers, Architects and Developers (Bat Conservation Ireland 2010), Bats and artificial lighting in the UK Bats and the Built Environment series Guidance Note 08/18 (Institution of Lighting Professionals & Bat Conservation Trust, 2018) and Guidance Notes for the Reduction of Obtrusive Light GN01 (Institute of Lighting Professionals, 2011). Construction stage lighting details will be reviewed by a qualified bat ecologist. If necessary, the bat ecologist will recommend adjustments to directional lighting (e.g. through cowls, shields or louvres) to minimise light spill from the proposed development to the surrounding areas.
- Noise and vibration and air impacts during construction. These effects will be short-term in nature and will be mitigated by measures outlined in the relevant section of the EIAR.
- Potential indirect effects on hydrology and hydrogeology during construction and operational phases which will be mitigated through construction management and by the proposed surface water management and attenuation system with respect to stormwater runoff, the drainage of foul effluent to the public foul sewerage system, and flood mitigation measures and which will be mitigated during construction by appropriate management measures. See section 8.5 Mitigation Measure during construction phase of the EIAR. Measure include:
 - Soil stripping and subsoil excavations will be carried out in a controlled manner, coordinated with the progress of the development. The extent of the soil strip at any given time will be limited to the immediate vicinity of active work areas to minimise exposure of soils to the effects of weathering (dust and runoff generation), especially within the inner protection area. Stormwater runoff within the inner protection area will be managed to ensure no ponding or flooding of excavations occurs in close proximity to the abstraction;

- Potential discharges to ground during construction include concrete wash-water, treated wastewater from welfare facilities and release of rainwater from bunds. A dedicated concrete washout area will be constructed on site in the construction phase which will not permit the release of wash water to either groundwater or as surface runoff. All site welfare facilities will be sealed tanks with no discharge or treated effluent to ground. Rainwater from bunds on site will not be drained to ground; banded water will be removed off-site for appropriate disposal to a licenced facility;
- Pollution prevention measures will be implemented in relation to the storage and use of fuels and chemicals on site. All fuels, oils and chemicals will be stored in a designated banded storage area capable of storing 110% of the stored tank/container volume. All refuelling will be carried out in a designated refuelling area on site. All construction vehicles, mobile plant and machinery will be regularly inspected and precautions will be taken in the maintenance of any vehicles or plant on site;
- In the event of a leak/spill, emergency response procedures will be in place for accidental leaks or spills on site. An adequate supply of spill kits and hydrocarbon absorbent pads will be maintained at locations across the site. Any contaminated soils will be excavated, temporarily stored on site in an appropriate manner, tested and disposed off-site to an appropriately licenced waste facility;
- As most of the proposed development lies within the zone of contribution of the Enfield PWS in the worst-case scenario, no permeable pavement is proposed in the construction phase of the proposed development to prevent adverse effects on groundwater quality in the operational phase and to ensure the highest level of protection for groundwater. Infiltration of roof drainage to ground is acceptable beneath the sealed surface;
- Foul sewers and surface water drain trenches in the inner protection zone will be lined with an impermeable liner and have a concrete surround about the pipes to ensure the highest level of protection for groundwater within the inner protection area. Foul sewers and surface water drain trenches across the remainder of the development will be lined with an impermeable liner as an added protection to groundwater;

- All sewers and drains will be installed and constructed to the relevant codes of practice and guidelines. The installation of all sewers and drains will be supervised by a civil engineer and CCTV-surveyed and pressure tested on completion.
- Traffic and transportation impacts, which will be mitigated by the management of construction traffic.

12.13.2. The proposed development is not likely to have adverse effects on population, biodiversity, land and soil, material assets and cultural heritage. Further it is not likely to increase the risk of natural disaster.

12.13.3. The likely environmental effects arising as a consequence of the proposed development have been satisfactorily identified, described and assessed. The environmental impacts identified are not significant and would not require or justify refusing permission for the proposed development or require substantial amendments to it.

12.14. **Appropriate Assessment (AA)**

12.14.1. A Screening Report and Natura Impact Statement - Stage 1 Screening and Stage 2 Appropriate Assessments (dated September 2020) was submitted with the application, prepared by Scott Cawley. I have had regard to the contents of same. This report concludes that following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the proposed development and with the implementation of the design and mitigation measures proposed, that the proposed development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in-combination with other plans or projects.

The Project and Its Characteristics

12.14.2. See the detailed description of the proposed development in section 3.0 above.

The European Sites Likely to be Affected - Stage I Screening

12.14.3. There are no European sites within or immediately adjacent to the proposed development boundary. The nearest European sites to the proposed development are the River Boyne and River Blackwater SAC and the River Boyne and River Blackwater SPA located c. 9.6km north-west of the site (c. 17km downstream of the site). The nearest river to the site, the River Blackwater [Longwood] (located c. 700m to the southwest of the site), is a tributary of the River Boyne which is located c. 17km north of the proposed development.

12.14.4. Section 4.1 of the AA screening submits that:

“there is a potential impact pathway between the proposed development site and the River Boyne and River Blackwater SAC and SPA via surface waters (i.e. treated surface waters from the proposed development site will discharge to the River Boyne via the Ballycarron River and the River Blackwater [Longwood]) and via foul waters (i.e. treated foul waters from the proposed development will discharge to the River Boyne via Enfield WWTP)”.

12.14.5. It is stated that: “There is only one European site designated for groundwater dependent habitats or species located within the same groundwater body as the proposed development site (i.e. “Trim”); the River Boyne and River Blackwater SAC which is designated for Alkaline Fens [7230] and Alluvial Forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae) [91E0]. As such, there is also a potential impact pathway between the proposed development and the River Boyne and River Blackwater SAC via groundwater. The proposed development has no potential source-pathway-receptor connections with any other European sites other than the River Boyne and River Blackwater SAC and SPA.

- River Boyne and River Blackwater SAC (002299)
- River Boyne and River Blackwater SPA (004232)

Table 8 Natura 2000 sites

Natura 2000	Site Code	Distance to site	Qualifying Interests
River Boyne and River Blackwater SAC	002299	c. 9.6km north-west of the site (c. 17km downstream of the site).	Alkaline fens [7230] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnion incanae</i> , <i>Salicion albae</i>) [91E0] <i>Lampetra fluviatilis</i> (River Lamprey) [1099] <i>Salmo salar</i> (Salmon) [1106] <i>Lutra lutra</i> (Otter) [1355]
River Boyne and River Blackwater SPA	004232	c. 9.6km north-west of the site (c. 17km downstream of the site).	Kingfisher (<i>Alcedo atthis</i>) [A229]

12.15. The Conservation Objectives for the River Boyne and River Blackwater SAC includes:

- To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.

12.16. The Conservation Objectives for the River Boyne and River Blackwater SPA includes:

- To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

Habitat

12.16.1. The land surrounding the proposed development site consists of agricultural fields, amenity grassland and built land. The following habitat types of the Heritage Council classification system⁴ were identified within the subject lands during the site surveys on 2nd and 3rd May 2019 and 10th June 2020:

- Improved agricultural grassland (GA1);
- Tilled land (BC3);
- Hedgerows (WL1);
- Treeline (WL2);
- Scrub (WS1);
- Recolonising bare ground (ED3);
- Earth banks (BL2); and
- Buildings and artificial surfaces (BL3).

12.16.2. None of these habitats correspond to the QI habitats of any of the European sites listed in Appendix I nor were the habitats deemed to be suitable for the QI or SCI species of any of the European sites listed in Appendix I.

Flora and Fauna Species

12.16.3. The desktop study found no records of any species or habitats for which the European sites listed in Appendix I are designated for within the subject lands, their immediate environs, or within c. 2km of the subject lands. No species or habitats for which European sites listed in Appendix I are designated were recorded during the field surveys.

12.16.4. The desktop study found no records of non-native invasive plant species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011, within the proposed development site⁵ or within c. 2km of the proposed development site. No non-native invasive species, including those listed on the Schedule 3 of the Birds and Habitats Regulations (2011) were noted within the subject lands during the site surveys.

Hydrology

12.16.5. Surface water from the proposed development will enter the existing surface water drainage system on the New Road. This drainage channel runs under the Relief Road (R148) in a southerly direction and outfalls to the Ballycarron River which is a tributary of the River Blackwater [Longwood]. The Ballycarron River converges with the River Blackwater [Longwood] c. 1.3km south of the proposed development site. The River Blackwater [Longwood] joins the River Boyne c. 17km downstream of this convergence. According to EPA Map Viewer, the subject lands fall within the Boyne River Water Framework Directive (WFD) catchment and the Blackwater [Longwood] WFD subcatchment. The Blackwater [Longwood] has a WFD

status (2013-2018) of “Moderate” and a WFD risk score of “At Risk” of not achieving a good status at the point where the Ballycarron River converges with it. The River Boyne has a WFD status (2013-2018) of “Good” and a WFD risk score of “At Risk” at the point where the Blackwater [Longwood] converges with it. The Boyne Estuary transitional waterbody has a WFD status (2013-2018) of “Moderate” and a WFD risk score of “At risk”. The Boyne Estuary Plume Zone coastal waterbody has a WFD status (2013-2018) of “Moderate” and its risk score is currently under review.

Hydrogeology

12.16.6. The proposed development is within the “Trim” groundwater body and is classified as “Locally Important Aquifer-Bedrock which is Generally Moderately Productive”. A small area of the western section of the subject lands has a groundwater vulnerability score of “High Vulnerability”, whereas the majority of the subject lands has a groundwater vulnerability score of “Moderate Vulnerability”. The most recent WFD groundwater status for the site (2010-2015) is “Good” and it has a WFD status is “At Risk”.

Habitat loss and fragmentation

12.16.7. The proposed development does not overlap with the boundaries of any European sites. Therefore, there are no European sites at risk of direct habitat loss impacts. As the proposed development does not traverse any European sites there is no potential for habitat fragmentation to occur. There are no suitable breeding, foraging and/or roosting habitats, which may be utilised by SCI bird species or QI Annex II fauna species of any European site as ex-situ sites, present within the subject lands.

Habitat degradation as a result of hydrological impacts

Surface Water

12.16.8. Paragraph 5.2 of the AA Screening document submitted sets out that “during the construction phase and the operational phase of the proposed development, there is a potential hydrological link between the proposed development and two European sites; the River Boyne and River Blackwater SAC and the River Boyne and Blackwater SPA. In the absence of mitigation, it is possible that silt-laden/contaminated runoff could be released into the local surface water drainage system which outfalls to the Ballycarron River, a tributary of the River Blackwater

[Longwood], which drains to the River Boyne where the River Boyne and River Blackwater SAC and SPA are located”.

Foul Water

12.16.9. Foul water, comprising sewage and industrial effluent (and some surface water run-off), from the Enfield area is treated at Enfield WWTP prior to discharge into the River Boyne and ultimately the Irish Sea via the Boyne Estuary (c.80km downstream). The most recent information from Irish Water indicates that Enfield WWTP is operating above its capacity of 3,500 P.E. with a current operational loading of c. 4,698 P.E. 7 The proposed development will have a P.E. of 1,385 upon completion. Irish Water have confirmed capacity is available within the Enfield WWTP to serve the proposed development, once upgrade works to the WWTP are completed between 2020/21. Prior to completion of the necessary upgrades, foul waters from the proposed development will be treated on-site, and domestic treated effluent will comply with the discharges limits set by Irish Water (Biological Oxygen Demand (BOD) of 20mg/l and Total Suspended Solids (TSS) of 30mg/l) in order to be accepted into the Irish Water network (DBFL, 2020a - Appendix F). A temporary foul water pump station and wastewater treatment plant will be constructed on-site in order to achieve the effluent quality agreed with Irish Water.

Conclusion of the AA Screening

12.16.10. It is concluded by the AA Screening that the possibility may be excluded that the proposed development will have a likely significant effect on any European sites other than the River Boyne and River Blackwater SAC [002299] and the River Boyne and River Blackwater SPA [004232]. It is stated that all other European sites are located beyond the Zol.

12.16.11. I consider however that the design of the surface water treatment takes into account the scale and nature of the proposed development, i.e. a housing development of moderate size which will be constructed and operated in accordance with standard environmental features associated with a residential development, it is not considered that the proposed development would have potential to have a significant impact on the water quality (and hence various qualifying interests) of the River Boyne and River Blackwater SAC and SPA. The planning authority’s heritage officer notes that several protective design measures are set out in the Stage 1

and Stage 2 AA. It is noted that the Enfield WWTP will have capacity to accept foul water from this development following an upgrade (which are due to be complete 2020/2021). In the interim it is stated that *'domestic treated effluent meeting discharges limits of Biological Oxygen Demand (BOD) 20mg/l and Total Suspended Solids (TSS) of 30mg/l will be accepted into the Irish Water network. Irish Water request that a temporary on-site underground wastewater treatment plant must be established on the subject lands and used until the proposed upgrade is completed and commissioned'*.

12.16.12. Given the significant downstream distance of c. 17km between the European sites, the drainage and wastewater treatment systems proposed the works would not have the potential to affect the River Boyne and River Blackwater SAC and the River Boyne and River Blackwater SPA through the release of sediment, hydrocarbons or other pollutants. I do not consider there is potential for any impact on the River Boyne through any hydrological connections via surface, ground and wastewater pathway and therefore no potential for any significant adverse impact, from the proposed development, on the qualifying criteria of River Boyne and River Blackwater SAC.

12.16.13. The application site is not located adjacent or within a European site, therefore there is no risk of habitat loss, fragmentation or any other direct impacts. It is not considered that the proposed development would have any potential for a negative impact on the conservation objectives of the following Natura 2000 sites, or any other site:

- River Boyne and River Blackwater SAC (002299)
- River Boyne and River Blackwater SPA (004232)

12.16.14. I consider it is reasonable to conclude that, on the basis of the information on the file including the AA screening report and all of the planning documentation submitted by the applicant, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any European site, in view of the said sites' Conservation Objectives, and a Stage 2 Appropriate Assessment is not therefore required.

12.16.15. The mitigation measures proposed are standard drainage features that would be required on the surface water drainage system for any residential scheme with its own outfall regardless of whether that outfall was linked to any Natura 2000 site. The installation of similar features in the currently proposed development would be required whatever its relationship with the SAC / SPA or any other Natura 2000 site. Those features are not proposed or intended to mitigate a potential effect on the SAC/SPA. Reference to them merely indicates that a competently designed and constructed residential development on this site would not be likely to have a significant effect on the adjacent SAC / SPA during its operation.

12.16.16. If the Board does not adopt the screening recommendation set out in this report, then the submitted NIS provides sufficient information about the SAC and the SPA and about the proposed development and what are described as “mitigation measures” to allow a stage 2 appropriate assessment to be completed into any conceivable effect on any Natura 2000 site no matter how unlikely or insignificant. Appropriate assessment of a project only arises if the project is likely to have significant effect on a Natura 2000 site. The assessment needs to have an objective scientific basis. The precautionary principle allows the state to prevent action by private persons in order to achieve the environmental objectives of European law, including those of the habitat’s directive, even where scientific doubt remains about whether the constrained action would actually damage the environment. However, the precautionary principle does not justify setting aside the actual terms of article 6 of the habitats directive to include demonstrably insignificant or unlikely effects in the appropriate assessment of projects. Nor does it justify setting aside the empirical and rational basis for appropriate assessment by making it a routine and repetitive practice for housing schemes in urban areas that does not contribute to the achievement of environmental objectives.

12.16.17. The conclusion of this screening is consistent with the condition of the site as serviced lands proximate to an urban area that has been zoned in the main for residential development in a plan that was itself subject to appropriate assessment. It differs from the conclusion of the screening carried out by the applicant.

AA Screening Conclusion

- 12.16.18. In conclusion, therefore, having regard to the nature and scale of the proposed development on serviced lands, the nature of the receiving environment which comprises a built-up urban area, the distances to the nearest European sites, and the hydrological pathway considerations outlined above, it is reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any European sites, in view of the sites' Conservation Objectives, and a Stage 2 Appropriate Assessment is not therefore required.
- 12.16.19. In reaching this conclusion I took no account of mitigation measures intended to avoid or reduce the potentially harmful effects of the project on any European Sites.

13.0 Recommendation

- 13.1.1. I recommend that permission be **granted** for the proposed development subject to the conditions set out below in the 'Recommended Order':

14.0 Recommended Draft Board Order

Application for permission under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016, in accordance with plans and particulars, lodged with An Bord Pleanála on the 11th day of September 2020 by Hayfield Homes Ltd care of Declan Brassil and Co. Lincoln House, Phoenix Street, Smithfield Dublin 7.

Proposed Development:

- 14.1.1. The proposed development (as per the public notice) will consist of the construction of 513 no. residential dwellings and a childcare facility on a total site area of 17.31 ha, and a development area of 13.47 ha. The proposed residential development comprises the following;
- 14.1.2. 304 no. houses comprising:
- 33 no. two-storey three-bedroom semi-detached houses 107.2sqm (Unit Type A)

- 159 no. two-storey three-bedroom terraced house and semi-detached houses 114sqm (Unit Type C)
- 3 no. two-storey three-bedroom semi-detached/ end of terrace houses 114sqm (Unit Type CI)
- 21 no. two-storey four-bedroom semi-detached houses 132sqm (Unit Type B)
- 1 no. two-storey four-bedroom detached house 132sqm (Unit Type B1)
- 9 no. two-storey four-bedroom end-of-terrace houses 137.5sqm (Unit Types D1 & D2)
- 72 no. two-storey four-bedroom mid-terrace/ semi-detached houses 137.5sqm (Unit Type D)
- 2 no. two-storey four-bedroom mid-terrace houses 137.5sqm (Unit Type D3)
- 4 no. single storey three-bedroom bungalow 94.4sqm-104sqm (Unit Types EI & E)

14.1.3. 161 no. Apartments arranged in 4 no. four-storey apartment buildings comprising a total of:

- 75 no. one-bedroom apartments measuring 49sqm-59.9sqm (Unit Types A, AI, A2 & A3)
- 75 no. two-bedroom apartments measuring 77.9sqm-81.2sqm (Unit Types D & B)
- 11 three-bedroom apartments measuring 100 sq. m (Unit Type C)

14.1.4. 48 no. Duplex units comprising 24 no. two-bed units measuring 84sqm-87.4sqm (Unit Types F, G, K, L & P) and 24 no. three bedroom units measuring 121.2sqm-125.2sqm (Unit Types H, J, M & N).

14.1.5. A childcare facility (586.6sqm) is also proposed to serve the development.

14.1.6. The proposed development includes: 2 no. new vehicular access onto the Enfield Relief Road (R148) including two right hand turn lanes with ghost islands; upgrades to pedestrian and cycling infrastructure on the Enfield Relief Road including the provision of a footpath, two way cycle track, a verge and public lighting; 886 no. car parking spaces and 368 no. bicycle parking spaces; all site and infrastructural works including foul and surface water drainage, attenuation areas, temporary underground wastewater treatment plant, foul pump station, open space, boundary walls and

fences, landscaping, lighting, and internal roads; and, cycle paths, footpaths, cycle and pedestrian connections to the Enfield Relief Road, New Road and Newcastle Woods. This application is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).

- 14.1.7. The application contains a statement setting out how the proposal will be consistent with the objectives of the Meath County Development Plan 2013-2019. It is submitted that the proposed apartments have been designed to fully accord with the Sustainable Urban Housing: Design Standards for New Housing 2018. A full Housing Quality Assessment is submitted which provides details on compliance with all relevant standards including private open space, room sizes and storage.
- 14.1.8. The proposed development is accompanied with a Material Contravention Statement which sets out justification for the proposed development.
- 14.1.9. It is submitted that the relevant considerations in respect of the current application relate to the phasing of the lands, being designated Phase II (Post 2019) in the current Meath County Development Plan 2013-2019, and the scale of the proposed development with reference to the existing housing stock in the town. Enfield is allocated 319 no. new units between 2013 and 2019 under the Core Strategy of the County Plan. The Plan prioritises the development of eight sites to accommodate these units during the Plan period and designates the remaining residential lands for development in the following Plan period ('post-2019').

Objective CS OBJ 3 states:

"To operate an Order of Priority for the release of residential lands as follows:

- i) The lands identified with an A2 "New Residential" land use zoning objective corresponds with the requirements of Table 2A4 of this Development Plan and are available for residential development within the life of this Development Plan.
- ii) The lands identified with an A2 "New Residential" land use zoning objective but qualified as "Residential Phase II (Post 2019)" are not available for residential development prior to 2019".

- 14.1.10. Similarly, Strategic Policy SP 3 of the Enfield Written Statement states:

“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 with an A2 “New Residential” land use zoning objective corresponds with the requirements of Table 2.4 Housing Allocation & Zoned Land Requirements in Volume I of this County Development Plan and are available for residential development within the life of this Development Plan.
- II) The lands identified with an A2 “New Residential” land use zoning objective but qualified as “Residential Phase II (Post 2019)” are not available for residential development within the life of this Development Plan”

14.2. In addition, the Plan restricts the scale of new residential development in Small Towns with reference to the existing housing stock in the settlement. SS Obj 14 of the Plan states;

“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”.

Decision

Grant permission for the above proposed development in accordance with the said plans and particulars based on the reasons and considerations under and subject to the conditions set out below.

Matters Considered

In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included any submissions and observations received by it in accordance with statutory provisions.

Reasons and Considerations

In coming to its decision, the Board had regard to the following:

- (a) the policies and objectives set out in the Meath County Development Plan 2013-2019
- (b) the zoning of the majority of the site for residential development - "A2" - New Residential (Phase II lands) with an 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."
- (c) The Rebuilding Ireland Action Plan for Housing and Homelessness 2016;
- (d) The Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual – a Best Practice Guide, issued by the Department of the Environment, Heritage and Local Government in May 2009;
- (e) Urban Development and Building Heights Guidelines for Planning Authorities, prepared by the Department of Housing, Planning and Local Government in December 2018;
- (f) The Sustainable Urban Housing: Design Standards for New Apartments issued by the Department of the Environment, Community and Local Government in March 2018;
- (g) Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport and the Department of the Environment, Community and Local Government in March 2013;
- (h) The nature, scale and design of the proposed development and the availability in the area of a wide range of social, community and transport infrastructure;
- (i) The pattern of existing and permitted development in the area;
- (j) The planning history of the site and within the area;
- (k) Section 37(b)(2) of the Planning and Development Act 2000, as amended, whereby the Board is not precluded from granting permission for a development which materially contravenes a Development Plan;
- (l) The submissions and observations received;

- (m) The Chief Executive Report from the Planning Authority; and
- (n) the report of the inspector.

The Board considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, and would be acceptable in terms of pedestrian and traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

Appropriate Assessment Screening

The Board completed an Appropriate Assessment Screening exercise in relation to the potential effects of the proposed development on the River Boyne and River Blackwater SAC site code 002299 and the River Boyne and River Blackwater SPA site code 004232, taking into account the nature, scale and location of the proposed development, the information submitted with the application, the Inspector's report and the submissions on file. In completing the screening exercise, the Board adopted the report of the Inspector and concluded that the development that is authorised by this permission would not be likely to have a significant effect on the above European Sites or on any other European Site in view of the sites' conservation objectives, either individually or in combination with any other plan or project, and that a Stage 2 Appropriate Assessment is not required.

Environmental Impact Assessment

The Board completed, in compliance with s.172 of the Planning and Development Act 2000, an Environmental Impact Assessment of the proposed development, taking into account:

- The nature, scale and extent of the proposed development;
- The Environmental Impact Assessment Report and associated documentation submitted in support of the application;
- The submissions from the applicant, Planning Authority, the observers and the prescribed bodies in the course of the application; and

- The Planning Inspector's report;

The Board considered that the Environmental Impact Assessment Report, supported by the documentation submitted by the applicant identifies and describes adequately the direct, indirect, secondary and cumulative effects of the proposed development on the environment. The Board is satisfied that the information contained in the EIAR complies with the provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU. The Board generally agreed with the summary and examination, set out in the Inspector's reports, of the information contained in the Environmental Impact Assessment Report and associated documentation submitted by the applicant and submissions made in the course of the application. The Board is generally satisfied that the Inspector's reports set out how these were addressed in the assessment. The Board completed an Environmental Impact Assessment in relation to the proposed development and concluded that, subject to the implementation of the mitigation measures proposed as set out in the EIAR, and, subject to compliance with the conditions set out herein, the effects on the environment of the proposed development by itself and cumulatively with other development in the vicinity would be acceptable. In doing so, the Board adopted the report and conclusions of the reporting inspector.

Reasoned Conclusions on the Significant Effects

The Board considered that the main significant direct and indirect effects of the proposed development on the environment are, and will be mitigated as follows:

Population:

Significant direct positive effects with regard to population due to the increase in the housing stock and economic activity.

Landscape and Visual Amenity:

Potential direct negative effects on the landscape and visual amenity through the loss of mature hedgerow and trees. These effects will be mitigated by proposed mitigation measures outlined in Chapter 14–Landscape and Visual Assessment and Chapter 16-Summary of Mitigation Measures of the EIAR including the retention and augmentation of existing planting and replacement hedgerow planting.

Traffic and Transportation:

Potential negative effects on Traffic and Transportation arising from the additional traffic generated by the proposed development. These effects will be mitigated by proposed mitigation measures outlined in Chapter 11–Material Assets: Traffic and Chapter 16-Summary of Mitigation Measures of the EIAR and the attached planning conditions including traffic calming measures, independent road safety audits, revised access and road layout arrangements, a detailed construction management plan and construction traffic management plan.

Biodiversity:

Potential direct effects with regard to loss of Habitat and Green Infrastructure. To offset the loss of higher significance hedgerow and treelines it is proposed to create new, biodiversity planting within areas of public open space and along new routes and boundaries within the development. This planting will effectively create a new biodiversity corridor which will provide connectivity for the species which are currently recorded in this location. While this woodland will take time to mature it will ultimately compensate for the loss of hedgerows and green infrastructure arising from the development. Potential indirect effects to species, including Bats, during construction and operational phases. Site surveys for Biodiversity purposes were carried out in May 2019 and June 2020, which is an optimal season for surveying habitats and breeding birds, it has been demonstrated that subject to condition the impact upon biodiversity and bats is acceptable. Therefore, these indirect effects to species, will be mitigated by proposed mitigation measures outlined in Chapter 6– Biodiversity of the EIAR.

Noise and Vibration and Air:

During the construction phase these effects will be short-term in nature and will be mitigated by measures outlined in Chapters 9 and 10 of the EIAR and the proposed mitigation measures outlined in Chapter 16 – Summary of Mitigation Measures.

Water:

Potential indirect effects on water during construction and operational phases which will be mitigated as outlined in Chapter 12-Material Assets- Water Supply, Drainage and Utilities and Chapter 16-Summary of Mitigation Measures of the EIAR through

construction management and by the proposed surface water management and attenuation system with respect to stormwater runoff, the drainage of foul effluent to a temporary on-site underground wastewater treatment plant prior to entering the foul pump station until such a time that upgrade works to the Enfield WWTP are complete (2020/2021), and flood mitigation measures which will be mitigated during construction. The Board noted that future sewer system upgrades are indicatively scheduled for completion in 2020/2021, with water supply for the development to be taken from a new Irish Water supply installation to the east of the site. This new installation is to be delivered by an adjacent landowner in conjunction with Irish Water. Irish Water has issued a Statement of Design Acceptance for the development proposal.

The proposed development is not likely to have significant adverse effects on human health, land and soil, climate, micro-climate, material assets and archaeological, architectural and cultural heritage. Further it is not likely to increase the risk of natural disaster.

The EIAR has considered that the main significant direct and indirect effects of the proposed development on the environment would be primarily mitigated by environmental management measures, as appropriate.

The Board completed an Environmental Impact Assessment in relation to the proposed development and concluded that, subject to the implementation of the mitigation measures proposed as set out in the EIAR and subject to compliance with the conditions set out herein, the effects on the environment of the proposed development by itself and cumulatively with other development in the vicinity would be acceptable.

Conclusions on Proper Planning and Sustainable Development

The Board considered that, subject to compliance with the conditions set out below, the proposed development would provide housing of an appropriate form and density at a suitable location; that it would achieve an acceptable standard of urban design and make a positive contribution to the character of the area and the town; that it would provide a proper standard of residential amenity for its occupants; that it would not seriously injure the residential or visual amenities of the area or of property in the vicinity; that it would have the benefit of adequate water supply and drainage and

would not give rise to an undue risk of flooding; and that it would be acceptable in terms of safety and convenience of road users. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area. The Board considered that, while a grant of permission for the proposed Strategic Housing Development would not materially contravene a zoning objective of the statutory plans for the area, a grant of permission could materially contravene the provisions

14.2.1. There is one issue raised in the applicant's Material Contravention statement, it relates to the phasing of the lands, being designated Phase II (Post 2019) in the current Meath County Development Plan 2013-2019, and the scale of the proposed development with reference to the existing housing stock in the town. Objective CS OBJ 3 states: "To operate an Order of Priority for the release of residential lands as follows: i) The lands identified with an A2 "New Residential" land use zoning objective corresponds with the requirements of Table 2A4 of this Development Plan and are available for residential development within the life of this Development Plan. ii) The lands identified with an A2 "New Residential" land use zoning objective but qualified as "Residential Phase II (Post 2019)" are not available for residential development prior to 2019". Similarly, Strategic Policy SP 3 of the Enfield Written Statement states: "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:

- iii) The lands identified with an A2 "New Residential" land use zoning objective corresponds with the requirements of Table 2.4 Housing Allocation & Zoned Land Requirements in Volume I of this County Development Plan and are available for residential development within the life of this Development Plan.
- iv) The lands identified with an A2 "New Residential" land use zoning objective but qualified as "Residential Phase II (Post 2019)" are not available for residential development within the life of this Development Plan"

14.2.2. In addition, the Plan restricts the scale of new residential development in Small Towns with reference to the existing housing stock in the settlement. SS Obj 14 of the Plan states;

“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”.

The Board considers that, having regard to the provisions of section 37(2) of the Planning and Development Act 2000, as amended, the grant of permission in material contravention of the Meath County Development Plan 2013 – 2019 would be justified for the following reasons and consideration.

In relation to section 37(2)(b) (i) of the Planning and Development Act 2000 (as amended): The proposed development is considered to be of strategic and national importance having regard to the definition of ‘strategic housing development’ pursuant to section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) and its potential to contribute to the achievement of the Government’s policy to increase delivery of housing from its current under supply set out in Rebuilding Ireland – Action Plan for Housing and Homelessness issued in July 2016. The proposed development is of strategic importance to the development of Enfield in line with national policies to provide for compact growth within the Dublin MASP, and in proximity to public transport.

In relation to section 37(2)(b) (ii) of the Planning and Development Act 2000 (as amended): Objective SS OBJ 14 of the Development Plan and Policy SP3 of the Enfield Written Statement conflict with the overarching objectives for Enfield in the Core Strategy and Settlement Strategy of the Meath County Development Plan which seek to support the sustainable growth of the town to Moderate Growth Town status. Strategic Policy SP3 of the Enfield Written Statement prevents the release of certain zoned residential lands within the boundary of Enfield until after 2019, while SS OBJ 14 seeks to limit the number of units sought per planning application. It is submitted that there is no supporting text or objectives in the Plan to monitor the

implementation of the core or settlement strategies with the view of overriding these restrictive objectives where development is not forthcoming as planned.

In relation to section 37(2)(b)(iii) of the Planning and Development Act 2000, as amended: Permission for the development should be granted having regard to guidelines under section 28 of the Act, having particular regard to the advice contained at section 5.11 of the guidelines issued by the minister in 2009 on Sustainable Residential Development in Urban Areas that residential development on outer suburban greenfield sites should be at densities between 35 and 50 dwellings per hectare, with which the proposed development would comply.

In relation to section 37(2)(b)(iv) of the Planning and Development Act 2000, as amended: On the 09/08/2019 Under ABP Reference 304296-18 Strategic Housing Development for 132 units, a childcare facility and supporting service infrastructure was permitted on zoned residential 'A2' lands designated for Phase II (post 2019) development. These lands are located to the east of the subject site, on the opposite side of New Road and therefore have a similar planning and development context to the subject site, albeit that those lands are further removed from the town centre and associated amenities.

15.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development, or as otherwise stipulated by conditions hereunder, and the development shall be carried out and completed in accordance with the agreed particulars. In default of agreement the matter(s) in dispute shall be referred to An Bord Pleanála for determination.

Reason: In the interest of clarity.

2. Mitigation and monitoring measures outlined in the plans and particulars, including the Environmental Impact Assessment Report submitted with this application as set out in Chapter 16 of the EIAR 'Summary of Mitigation Measures', shall be carried out in full, except where otherwise required by conditions attached to this permission.

Reason: In the interest of protecting the environment and in the interest of public health.

3. A suitably qualified Ecological Clerk of Works (ECoW) shall be appointed by the developer to oversee the site set-up and construction of the proposed development and the Ecological Clerk of Works shall be present on-site during construction works. The Ecological Clerk of Works shall ensure the implementation of all mitigation measures proposed in the Environmental Impact Assessment Report. Prior to commencement of development, the name and contact details of said person shall be submitted to the planning authority. Upon completion of works, an audit report of the site works shall be prepared by the appointed Ecological Clerk of Works and submitted to the planning authority to be kept on record.

Reason: In the interest of nature conservation

4. (a) Prior to the commencement of development the developer shall submit, for the written agreement of the planning authority, written agreement in principle has been achieved with adjacent landowners, for the future provision of both pedestrian and cycle connections / access to Glen Abhainn Lawns and to Newcastle Woods Square to the northern boundary of the site.

(b) The development shall be carried out on a revised phased basis to the Phasing Plan Drawing no. PL900 submitted to the Board on the 11th of September 2020. Prior to commencement of any development on the overall site, details of a revised phased plan with future potential pedestrian and cycle access points to the north of the site prioritised in the overall phasing shall be submitted to, and agreed in writing with, the planning authority.

(c) Work on any subsequent phases shall not commence until [completion of Phase

1 or prior phase or] such time as the written agreement of the planning authority is given to commence the next phase. Details of further phases shall be as agreed in writing with the planning authority.

Reason: To ensure the timely provision of services, for the benefit of the occupants of the proposed dwellings.

5. The applicant shall comply with the following transportation requirements:

(a) All non-vehicular access points on the site boundary shall provide for both walking and cycling.

(b) Prior to the commencement of development, the developer shall submit, for the written agreement of the planning authority details of the boundary treatment along New Road to include footpaths, road widening, public lighting and drainage. The amended site layout should also incorporate a vehicular link between the subject site and New Road so as to maximise the vehicle permeability throughout the proposed development. Details of the design, implementation, costing, phasing and site supervision (full time resident engineer) of these works shall be agreed with the Planning Authority prior to the commencement of development.

(c) Prior to the commencement of development, the developer shall submit, for the written agreement of the planning authority, a detailed design for the provision of a new footpath along New Road to the extent as shown on the site layout plan. The cost of the design, implementation and site supervision of these works shall be borne solely by the developer.

(d) Prior to the commencement of development, the developer shall submit for written agreement, details of the boundary treatment along the R148, Enfield bypass, to include the main access junctions, footpaths, cycleways, public lighting and drainage.

(e) Prior to the commencement of development, the developer shall submit for written agreement, drawings that demonstrates swept path analysis at the main Development Access junctions.

(f) Prior to the commencement of development, the developer shall submit, for the written agreement of the planning authority, a revised site layout plan to incorporate dedicated off line cycle path links to increase cycling permeability and connectivity between the development and the cycling infrastructure to be provided along the Enfield Relief Road.

(g) Prior to the commencement of development, the developer shall submit, for the written agreement of the planning authority, detailed proposals to provide raised tables at selected internal junctions to provide an added degree of pedestrian comfort, safety and priority at crossing locations.

(h) Prior to the commencement of development, the developer shall submit, for the written agreement of the planning authority, detailed proposals to provide an adequately sized parallel set-down area, of quantum and location to be agreed with Meath County Council to ensure sufficient and appropriate set-down for the creche.

(i) Prior to the commencement of development, the developer shall submit for the written agreement of the planning authority proposals to remove and relocate all car parking spaces located adjacent to the main development access junctions that could be considered to pose a road safety issue particularly perpendicular space that could cause conflict between vehicles accessing the development and vehicles reversing out of these spaces.

(j) Cycle parking should be provided in accordance with the 'Design Standards for New Apartments' to encourage and promote cycling. Prior to the commencement of development, the developer shall submit for the written agreement of the planning authority proposals to increase cycle parking and provision for any racking system.

Reason: in the interests of traffic safety and convenience and to ensure a satisfactory standard of development.

6. Prior to the commencement of development, the developer shall submit details of the streets within the development that demonstrate compliance with the specifications of the Design Manual for Urban Roads and Streets in relation to the width of carriageways and footpaths and the corner radii at junctions, for the written agreement of the planning authority:

Reason: To ensure that the streets in the authorised development facilitate safe movement by sustainable transport modes in accordance with the applicable standards set out in the Design Manual for Urban Roads and Streets and the National Cycle Manual

7. The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including:

- a) Location of the site and materials compound(s) including area(s) identified for the storage of construction refuse;
- b) Location of areas for construction site offices and staff facilities;
- c) Details of site security fencing and hoardings;
- d) Details of on-site car parking facilities for site workers during the course of construction;
- e) Details of the timing and routing of construction traffic to and from the construction site and associated directional signage, to include proposals to facilitate the delivery of abnormal loads to the site;
- f) Measures to obviate queuing of construction traffic on the adjoining road network;
- g) Measures to prevent the spillage or deposit of clay, rubble or other debris on the public road network;
- h) Alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public road or footpath during the course of site development works;
- i) Details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels;

- j) Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained. Such bunds shall be roofed to exclude rainwater;
- k) Off-site disposal of construction/demolition waste and details of how it is proposed to manage excavated soil;
- l) Means to ensure that surface water run-off is controlled such that no silt or other pollutants enter local surface water sewers or drains.
- m) A record of daily checks that the works are being undertaken in accordance with the Construction Management Plan shall be kept for inspection by the planning authority.

Reason: In the interest of amenities, public health and safety.

8. Drainage arrangements including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

Reason: In the interest of public health and surface water management

9. The developer shall enter into water and/or wastewater connection agreement(s) with Irish Water, prior to commencement of development.

Reason: In the interest of public health.

10. The materials, colours and finishes of the authorised buildings, the treatment of boundaries within the development and the landscaping of the site shall generally be in accordance with the details submitted with the application, unless the prior written agreement of the planning authority is obtained to minor departures from those details.

Reason: In the interest of visual amenity.

11. The site shall be landscaped in accordance with the detailed comprehensive scheme of landscaping, which accompanied the application submitted, unless

otherwise agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interests of residential and visual amenity.

12. (a) The areas of public open space shown on the lodged plans shall be reserved for such use and shall be soiled, seeded, and landscaped in accordance with the landscape scheme submitted to An Bord Pleanála with this application, unless otherwise agreed in writing with the planning authority. This work shall be completed before any of the dwellings are made available for occupation and shall be maintained as public open space by the developer until taken in charge by the local.

(b) Prior to the commencement of development, the developer shall submit details, for written agreement, for the provision of a playground, mini basketball courts and additional play facilities to serve future residents within the scheme.

Reason: In order to ensure the satisfactory development of the public open space areas, and their continued use for this purpose.

13. Proposals for an estate/street name, house numbering scheme and associated signage shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, all estate and street signs, and house numbers, shall be provided in accordance with the agreed scheme. The proposed name(s) shall be based on local historical or topographical features, or other alternatives acceptable to the planning authority. No advertisements/marketing signage relating to the name(s) of the development shall be erected until the developer has obtained the planning authority's written agreement to the proposed name(s).

Reason: In the interest of urban legibility [and to ensure the use of locally appropriate place names for new residential areas].

14. All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of

broadband infrastructure within the proposed development. All existing over ground cables shall be relocated underground as part of the site development works.

Reason: In the interests of visual and residential amenity

15. The developer shall prevent any mud, dirt, debris or building material being carried onto or placed on the public road or adjoining property(s) as a result of the site construction works and repair any damage to the public road arising from carrying out the works.

Reason: In the interests of traffic safety and residential amenity.

16. Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Saturdays inclusive, and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

Reason: In order to safeguard the amenities of property in the vicinity.

17. The developer shall facilitate the archaeological appraisal of the site and shall provide for the preservation, recording and protection of archaeological materials or features which may exist within the site. In this regard, the developer shall:

(a) notify the planning authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development, and

(b) employ a suitably-qualified archaeologist prior to the commencement of development. The archaeologist shall assess the site and monitor all site development works.

The assessment shall address the following issues:

(i) the nature and location of archaeological material on the site, and

(ii) the impact of the proposed development on such archaeological material.

A report, containing the results of the assessment, shall be submitted to the planning authority and, arising from this assessment, the developer shall agree in writing with the planning authority details regarding any further archaeological requirements (including, if necessary, archaeological excavation) prior to commencement of construction works.

In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

Reason: In order to conserve the archaeological heritage of the area and to secure the preservation (in-situ or by record) and protection of any archaeological remains that may exist within the site.

18. A minimum of 10% of all communal car parking spaces shall be provided with functioning electric vehicle charging stations/points, and ducting shall be provided for all remaining car parking spaces, including in-curtilage spaces, facilitating the installation of electric vehicle charging points/stations at a later date. Proposals to achieve this shall be submitted and agreed in writing with the planning authority prior to the occupation of the development.

Reason: To provide for and/or future proof the development such as would facilitate the use of electric vehicles.

19. Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the provision of housing in accordance with the requirements of section 94(4) and section 96(2) and (3) (Part V) of the Planning and Development Act 2000, as amended, unless an exemption certificate shall have been applied for and been granted under section 97 of the Act, as amended. Where such an agreement is not reached within eight weeks from the date of this order, the matter in dispute (other than a matter to which section 96(7) applies) may

be referred by the planning authority or any other prospective party to the agreement to An Bord Pleanála for determination.

Reason: To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan of the area.

20. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions*** of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

21. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion of roads, footpaths, watermains, drains, open space and other services required in connection with the development, coupled with an agreement empowering the local authority to apply such security or part thereof to the satisfactory completion of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the

developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.

Reason: To ensure the satisfactory completion of the development

Fiona Fair

Senior Planning Inspector

03/12/2020

APPENDIX A- List of submissions received

1. Angela Smith
2. Enfield Development Group
3. Joanna McKenna
4. Marian Lewis and others
5. Nicola and Shane Halligan
6. Noel French
7. Patricia Horan
8. Ronan Moore
9. Sean and Elizabeth O'Kelly